

COMMENT ON THE BOTANY AND DUNE ECOLOGY, AND WETLAND ECOSYSTEMS IMPACT ASSESSMENTS: THYSPUNT NPS, 2nd Draft EIA REPORT.

Compiled by Prof RM Cowling BSc (Hons), PhD, ASSAf, NAS (USA), SACNAS and submitted on behalf of F.O.S.T.E.R. (Friends of St Francis Nature Areas), a member of the Thyspunt Alliance. FOSTER is a Public Benefit Organisation, registered in terms of section 18A of the income tax act No 58 of 1962.

Botany and Dune Ecology Impact Assessment

(i) The Botany and Dune Ecology Impact Assessment fails to use Rouget et al. (2004) as a bioregional planning product. This assessment has been superseded by a more recent and finer-scale assessment, namely Vromans et al. (2010). This report includes finer-scale vegetation types and a more comprehensive and appropriate assessment of endangerment and recommendations for land use. Vromans et al (2010) must be incorporated in a substantive way in a revised draft of this report.

(ii) There is no costing for implementing the mitigation measures.

Wetland Ecosystems Specialist Study

There is no costing for implementing the mitigation measures.

(i) The report makes reference to offsets as mitigation measures. As per my comments on the first draft, offsets are not mitigation measures and reference to this must be removed from the report.

References

Rouget, M, Reyers, B, Jonas, Z, Desmet, P, Driver, A, Maze, K, Egoh, B & Cowling, R M (2004). South African National Spatial Biodiversity Assessment 2004: Technical Report. Volume 1: Terrestrial Component. Pretoria: South African National Biodiversity Institute.

Vromans DC, Maree KS, Holness S, Job N and Brown AE. 2010. The Garden Route Biodiversity Sector Plan for the southern regions of the Kouga and Koukamma Municipalities. Supporting land-use planning and decision-making in Critical Biodiversity Areas and Ecological Support Areas for sustainable development. South African National Parks, Knysna.