



## Environment State Bureau

### Opinion No. 3

#### Regarding the Final Report on the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf Resort"

Valid until January 30, 2012.

**Initiator of the planned activity** - SIA "Incom Network Rīga", registration No. 40003434229, address: Aldaru 10 - 4, Riga, LV – 1050.

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Subject to the Final Report on the Environmental Impact Assessment for the Golf Complex "Timberland Hills Golf Resort" submitted to the State Bureau for Environmental Supervision on 19 December 2008 the opinion preparation and issue procedure was started in compliance with Section 19 of the Environmental Impact Assessment Law.

**1. Name of the Planned Activity** – construction of the golf complex "Timberland Hills Golf resort".

**2. Potential Location of the Planned Activity** – real property owned by SIA "Incom Network Rīga" in Dobeles District: "Krišjāņi" (cadastral No. 46420060137, 46420060166), "Saulieši" (cadastral No. 46420060013), "Rogas" (cadastral No. 46420060101), "Timberland" (cadastral No. 4642006 0094), "Eglāji" (cadastral No. 46420060010) un "Priežu krasti" (cadastral No. 46420060146) in Annenieki Rural District and "Saulieši" (cadastral No. 4680 001 0014) in Naudīte Rural District.

### 3. Short Description of the Planned Activity

The environmental impact assessment for construction of the golf complex "Timberland Hills Golf resort" in Dobeles District was launched on 1 October 2007 when the State Bureau for Environmental Supervision, having examined the results of the initial environmental impact assessment conducted by Jelgava Regional Environmental Office of the State Environment Service and the appended materials, passed the decision No. 485 on conducting the environmental impact assessment procedure for the planned activity pursuant to Sections 4, 11, 13 and Section 14 Paragraph 1 of the Environmental Impact Assessment Law.

The Environmental Impact Assessment Report provides information on that construction of the golf complex "Timberland Hills Golf resort" is planned in Dobeles District, in real property owned by SIA "Incom Network Rīga", which is located in the territories of Annenieki and Naudīte Rural Districts. The total planned area of the complex is 294.2 ha and it comprises real properties named "Krišjāņi", "Saulieši", "Rogas", "Timberland", "Eglāji" and "Priežu krasti" in Annenieki Rural District and "Saulieši" in Naudīte Rural District.

The territory planned for the golf complex encloses (surrounds) the country household "Rūjas", but in the vicinity of the territory the country household "Cepļi" is located about 135 m to the north, the country

household "Jākšīņas" about 230 m to the north-west and the country household "Stūri" about 230 m to the west. The nearest populated settlement Slagūne is located approximately 700 m to the north. A popular tourism attraction object – Pokaiņi Forest – is located approximately 1.5 km to the south-west of the planned location. It is indicated in the Report that according to the approved territorial plan of Annenieki Rural District for the years 2005 – 2017 the territory intended for development of the golf complex is located in agricultural and woodland territories. The parcel of land "Saulieši" located in Naudīte Rural District is situated in the woodland according to the approved territorial plan of Naudīte Rural District for the years 2007 – 2019. The majority of the agricultural land is overgrown with shrubbery and trees, resulting in growth of the secondary forest. In the second half of last century the territory intended for construction of the golf complex was part of the buffer zone for military training grounds. In total, it is necessary to transform about 130 ha of land for creation of the golf complex. It is indicated in the Report that in general the territory should be characterized as being medium-natural with high naturalness potential. Annenieki Rural District does not have agricultural lands of national importance and the territory intended for the golf complex does not cover agricultural lands of regional importance. As the territory is anthropogenically slightly affected it attracts the big mammals (wild boar, roe-deer, deer, elk) and is used for hunting. Part of the territory of the golf complex is administered by the hunters' society "V.I.V.". Presently administering agreements concluded with the society are valid for the property "Timberland" (9.9 ha), "Krišjāņi" (both parcels 238 ha) and "Priežu krasti" (17.2 ha). After construction of the golf complex the area of hunting grounds will decrease by approximately 10%. The territory intended for development of the golf complex does not contain any state-protected culture monuments and the territory does not include protection zones for culture monuments.

The territory planned for development of the golf complex is 86 km from Riga and 12 km from Dobeles. It is situated in the distance of about 8 km from the highway A9 Rīga – Liepāja, the road V1129 Naudīte – Slagūne – Upenieki passes along the north part of the territory while the road V1128 Dobeles – Īle – Auce passes along its south border. Access of the complex from the highway A9 is by the road V1130 Kaķenieki - Slagūne (presently with gravel surface) which joins the road V1129. AS "Latvenergo" overhead electric power line passes along the road V1128 and the territory of Annenieki Rural District is crossed by the main gas pipeline, but as no business activities are currently being carried out within the territory intended for the complex, it does not have any engineering networks.

It is indicated in the Environmental Impact Assessment Report that according to information provided by Latvian Environment, Geology and Meteorology Agency the territory intended for the activity and its vicinity do not include any especially protected nature monuments or trees or fields of especially protected species, but there is one micro-reserve whose buffer zone is part of the woodlands of the property "Rogas" and the property "Krišjāņi", although there are actually 3 especially protected forest biotopes marked within the territory intended for the activity in the property "Krišjāņi" according to the territorial planning of Annenieki Rural District. After examination of these forest biotopes in situ the authors of the Report indicate that only Plot No. 19 containing mostly linden, grey alder, goat willow, aspen and bird-cherry trees, corresponds to the status of the biotope "mixed broad-leaved forests (code 9020)" included in the Annex to the Cabinet of Ministers Regulation No. 153 of 21 February 2006 "Regulation on the List of Priority Species and Biotopes of the European Union in Latvia", but these forests are presently too young to correspond to the status of protected biotope; in Plot No. 25 there are no especially protected forest biotopes because the plot is almost completely covered in water and almost all trees have died; while in Plot No. 46 forest has been felled and almost the whole plot is covered by shrubbery and overgrown meadows. At the same time the authors of the Report indicate that the biotope "black alder quagmire (code 9080)" which is included in the Annex to the Cabinet of Ministers Regulation No. 153 of 21 February 2006 was found in the Plot No. 41 in the property "Krišjāņi", where it consists of about 60 years old black alder stand; and the especially protected biotope "broad-leaved forest wetland (code 91EO)" was found in forest Plot No. 42 of the property "Krišjāņi". The planned activities provide for preservation of the valuable woodlands in the parcels of land "Krišjāņi", "Rogas" and "Saulieši" and the especially protected biotopes in forest plots No. 41, 42 and 19. To ensure further existence of the micro-reserve adjoining the golf complex the expert opinion appended to the Report indicates that it is necessary to expand the micro-reserve by moving its north-west border by approximately 150 m into the direction of the planned construction site and to include in it the non-forest land in the south direction so that the micro-reserve would cover the necessary area of at least 350 m away from the nest; and taking into account the possible expansion of the micro-reserve the planned golf complex construction border has to be corrected by moving it away from the micro-reserve; furthermore, during the period of development and exploitation of the golf complex unauthorised access of the territory of the micro-reserve should be prevented.

The nearest especially protected nature areas which are at the same time Latvia's "NATURA 2000" protected nature areas of European importance – restricted nature areas Zebrus and Svēte Lakes and Viķi Marsh are located about 3.2 km to the north-west and approximately 10 km to the south-west of the golf complex territory respectively. No direct impact is estimated for these areas as a result of the planned activity, but there could be indirect impact due to increased anthropogenic load from the people visiting the area.

It is stated in the Report that the location of the planned activity is characterised by a segmented, low hilly relief. The elevation is 121.0 m above the sea level in the south part (Pastari Hill), with a decline to 77.0 m above the sea level in the north – north-west direction, the relative hillock height varies from 5 to 7 m. In the hollows water bodies have formed in many places, in the lowest parts of the relief there are springs and ditches. The groundwater in the territory ranges from 0.40 to 3.10 m below the surface of the earth. According to the letter No. 1-10/1934 of 31 October 2008 by Zemgale Regional Agricultural Department of the Rural Support Service appended to the Report no land reclamation systems have been developed in the planned golf complex territory. It is stated in the Report that the south border of the golf complex is directly adjoined by the public water drain N-2 which moves water into the national water drain Leinartu Spring and further into the River Sesava; in the territory's north – north-east part the surface discharge is ensured by the national drain Mucenieki Ditch and public drains N-5 and N-14 which fall into the River Gardene after approximately 8.5 km; about 1.5 km to the west of the territory of the planned activity there is the River Balžiņa flowing to the north into which the public drain N-1 (Jāšiņkalns) and N-5 take the surface discharge from the territory's north-west part. A little below N-5 inflow into the River Balžiņa there is Slagūne Water-mill Lake with the area of 1.1 ha, maximum depth 3 m, average – 1.2 m, volume of the water body - 13000 m<sup>3</sup>. Another water body – a fish pond with the area of 24.5 ha – is located south-east of the road P97 Zebrene – Annenieki.

In accordance to what is stated in the Environmental Impact Assessment Report the golf complex will comprise:

- 18-hole golf course with the total area of 96.39ha with the longest hole being 540 m. It is planned to arrange the golf course by adjusting it to the existing relief and landscape, supplementing it with 4 artificial water bodies with the total area of 5 ha and average depth 2 m.
- 5-star hotel with 300 rooms, a restaurant, bar and outdoor café, with a possibility to offer to the visitors SPA services, a fitness hall, a pool (12x20 m, volume approx. 480 m<sup>3</sup>), 6 tennis courts, a track for biking and jogging and for skiing in winter.
- Type of buildings as in Mežaparks in Riga with maximum preservation of the existing relief and tall and attractive trees, including setting up 600 single-family home plots with the average plot area of 2000 m<sup>2</sup>, out of which 155 plots (Golf View Homes) will be arranged along the golf course, while 445 plots (Villas) – along the perimeter of the territory in the distance of 50 m to 1500 m from the golf course. Furthermore, it is planned to construct 25 multi-apartment buildings of 2 to 3 stories for rent.
- Internal hard-surface roads with the length of approx. 16.5 km and a parking lot of 1.4 ha near the hotel, as well as a garage for the golf course maintenance machinery.

It is planned to implement development of the golf complex at 7 construction stages:

At the 1<sup>st</sup> construction stage – to construct the golf course and the hotel complex;

at the 2<sup>nd</sup> stage – to construct the few-story buildings nearest to the golf course;

at stages 3, 4, 5, 6 and 7 – to construct a particular number of residential buildings within the whole territory.

It is planned that the hotel complex will provide employment for up to 300 employees and the management of the territory will require a staff of up to 150. It is indicated in the Report that it is planned to separate the plots for single-family homes (each) along the internal and external perimeter of the golf course with a fence or hedge, thus the territory of the golf complex will be fenced. Consequently, it will be possible to enter and cross the territory of the golf complex by the roads for which neither barriers nor gates are planned.

To ensure optimum arrangement of the golf complex buildings and the golf course it is planned to move the existing road which crosses the territory of the golf complex and is situated between the roads V1129 Naudīte – Slagūne – Upenieki and V1128 Dobele – Īle – Auce, at the 1<sup>st</sup> stage of construction, maintaining its status of a public road. As this road is the only means of access to the country household "Rūjas" movement of the existing road will be approved with the owners and possessors whose property is located next to the existing and the new road. It is also planned to reconstruct and apply asphalt surface to the access road V1130 Kaķenieki – Slagūne which is necessary for the golf complex. According to the planned traffic intensity (1065 vehicles in 24 hours) V1130 should be constructed with NP7.5, planning the lane width of 6.0 m. It is stated in the Report that when designing these roads no restrictions will be specified for the types of vehicles with permission to use them.

For creation of the golf course it is planned to excavate and to shovel approximately 0.47 million m<sup>3</sup> of soil and to fill in approximately 0.42 million m<sup>3</sup> of soil. It is planned to use the excavated and shovelled soil for filling in the golf course while the rest of 0.05 million m<sup>3</sup> of soil will be levelled over the construction plots. It is planned to take the peat necessary for planting the lawn from the nearest deposits in Dobele, Jelgava, Tukums or Saldus Districts. When designing the golf course lawns and water bodies, as indicated in the Report, the lawns will generally cover the agricultural land while the water bodies will be designed in the relief declines in the places of the existing water bodies. It is planned that the golf course is used intensively from April to October. It is planned to mow the lawn once in 3 to 5 days, depending on the weather conditions. It is stated in the Report that the mowed grass stays on the lawn ensuring repeated use of nutrients. It will be necessary to use up to 30 tons or 308 kg per ha of mineral fertilisers per season for maintenance of the golf course. The dose of fertiliser will basically consist of 102 kg/ha nitrogen, 14 kg/ha phosphorus, 99 kg/ha potassium and other elements. It is planned to develop the seasonal lawn fertilisation schedule every year. To water the golf course lawn up to 1500 m<sup>3</sup> of water is necessary daily. The possible examined alternatives in watering the lawn are use of underground waters or use of water from the 4 artificial water bodies planned for the golf course in which the accumulated volume of water is up to 60000 m<sup>3</sup>. It is planned to install a stationary lawn watering system which will also provide for fertilisation of the lawn. The Report says that there are no specific quality requirements determined for the water to be used for watering of the lawn, but such water must not threaten, either directly or indirectly, the health of the residents and the opinion by the Public Health Agency should be obtained regarding the water quality. It is planned to clean and maintain the artificial water bodies regularly in order to prevent their overgrowth as their planned use during the period of vegetation is for watering the lawn but in winter – as skating-rinks. Power supply for the golf complex is planned from the electric power line which is located along the south border of the territory. For the needs of the boiler house and individual boilers of the single-family homes it is planned to use natural gas by constructing an approximately 8 km long branch from the transmission pipeline. The planned gas consumption by the golf complex boiler house is 336000 m<sup>3</sup> annually. Water supply to the hotel complex with the pool and to the single-family homes is planned from 8 newly constructed boreholes, arranging and expanding the water supply networks according to the construction stages. It is stated in the Report that the planned drinking water consumption for household needs and the volume of household wastewater will be on average 760 m<sup>3</sup> per day, including additional water for the pool due to ensuring water circulation and the related wastewater – up to 50 m<sup>3</sup> per day. It is planned to specify the procedure of treatment of the pool water during further designing, after choosing the concrete pool equipment. To treat household wastewater it is planned to construct a local biological treatment facility of sufficient capacity, building it as separate blocks – installing an additional block after each construction stage, providing for treatment of the planned wastewater volume, as well as ensuring their effective functioning depending on seasonal wastewater volume and pollution load fluctuations. The Report examines the possibility to discharge the treated wastewater into the drain N-1 which flows in the River Balžiņa, placing the treatment facility in the north-west part of the territory, or into the drain N-14 which flows into the national drain Mucenieki Ditch and further into the River Gardene, placing the treatment facility in the north-east part of the territory. It is indicated in the Report that according to the 2005-2008 monitoring data water of the River Gardene at the bridge on the road Dobele - Annenieki complies with the target indicator for carp-like fish waters specified by the Cabinet of Ministers Regulation No. 118 of 12 March 2002 "Regulation on the Quality of Surface and Underground Waters". The ecological investigation of the River Balžiņa conducted, in its turn, in May 2008 as part of the environmental impact assessment and determining the saprobity index shows, as indicated in the Report, that the water quality 50 m below Slagūne water body and 100 m above and below the bridge on the road P97 is marked as slightly polluted to polluted. Authors of the Report consider that discharge of treated wastewater is possible both in the drain N-1 and in the drain N-14, at the same time pointing out that to discharge the treated wastewater into drain N-1 technological solutions with higher

treatment effectiveness should be used for the treatment. Furthermore, to reduce surface discharge from the comparatively intensively fertilised golf course (area 96.39 ha), which could be up to 964 kg nitrogen annually and up to 17 kg phosphor annually, as indicated in the Report, it is planned to develop a drainage system which would provide for collection of at least 80% of discharge into the water bodies created within the territory of the golf complex. It is also planned to discharge the rainwater from roofs and areas with hard surfaces (about 3 ha) into the said water bodies.

For waste (household, garden and park, sludge from wastewater treatment facility) management within the golf complex it is planned to conclude an agreement with SIA "Komunālie pakalpojumi Dobeles PP", but for management of hazardous waste – agreements with licensed business companies.

Calculations of pollutant dispersion (for the boiler house) presented in the Environmental Impact Assessment Report show that the air quality standards (NO<sub>2</sub>, CO<sub>2</sub>) will not be violated. For evaluation of pollution from cars on the roads adjacent to the territory of the planned activity NO<sub>x</sub>, CO and PM<sub>10</sub> emissions were modelled. It is indicated in the Report that after asphaltting the road V1130 the maximum values specified by standards will not be exceeded. Evaluating and mapping the noise indicators in the Report it is stated that as a result of construction of the golf complex the traffic intensity on the roads A9 and V1130 will grow, thus increasing the noise level and expanding the noise-affected areas. The Report states that the maximum noise values in the residential areas adjacent to A9, V1130, V1129 and V1128 are exceeded already now. The authors of the Report think that for implementation of the planned activity, to reduce the noise generated by the traffic on A9 it is necessary to install anti-noise screens opposite the residential territories "Vekteri", "Lielkrogi", "Lejiņas" and part of the construction are in Kaķenieki, which should be provided, to the extent possible, by SIA "Incom Network Rīga" in cooperation with the administrator of major national highways. The noise level discomfort area along the road V1130 at all times of the day is estimated to be in the distance of up to 150 m – in residential areas "Klāvindriķi", "Virsaīši", "Krogzemji", "Ceplī" and part of the buildings in Slagūne. Authors of the Report consider that in this case the solution might be replacement of windows and doors at the building elevations most affected by the noise with sound insulation structures and materials. Anti-noise measures should be also taken for the rows of residential buildings of the golf complex, which will be situated in the direct vicinity of the road.

Building of the golf complex will result in considerable changes in the landscape of the territory. Consequently, the Report presents landscape preservation measures – preservation to the extent possible of the relief in the construction plots, preservation of forest zones in the lower parts of the relief and separate groves, retaining of wet hollows and the streams joining such, retaining to the extent possible the old trees, stone clusters, former dwelling locations, planting greenery along the roads.

On the grounds of the analysis of evaluated documentation the State Bureau for Environmental Supervision concludes:

- construction of the golf complex "Timberland Hills Golf resort" comprising a golf course, a hotel, single-family homes and multi-apartment buildings for rent is planned in Dobeles District, in the real property owned by SIA "Incom Network Rīga" in the territories of Annenieki and Naudīte Rural Districts, with implementation of the project at seven construction stages;
- the territory intended for the golf complex encloses (surrounds) the country household "Rūjas";
- it is necessary to transform about 130 ha of land for development of the golf complex;
- the territory intended for the golf course is comparatively not much affected anthropogenically;
- part of the territory of the golf complex is administered by the hunters' society "V.I.V." of Annenieki Rural District, as a result of creation of the golf complex the hunting grounds will be reduced by approximately 10%;
- the territory intended for construction of the golf complex does not contain nationally protected culture monuments and the territory does not cover protection zones of culture monuments;
- there is one micro-reserve adjoining the golf complex and especially protected biotopes have been found in plots No. 41, 42 and 19 of the forest in the territory;
- the planned activity intends to preserve the valuable forest stands in the parcels of land "Krišjāņi", "Rogas" and "Saulieši" and the detected especially protected biotopes;
- to protect the micro-reserve, in further designing process the planned border of the golf complex will be corrected by moving it for at least 350 m;

- the initiator of the activity agrees not to perform construction works in the territory adjoining the micro-reserve during the nesting season and to restrict or prohibit movement in the territory of the micro-reserve at the time of construction;
- the planned activity will not have a direct impact on Latvia's "NATURA 2000" protected nature areas of European importance – restricted nature areas Zebrus and Svēte Lakes and Vīķi Marsh which are situated about 3.2 km and 10 km away from the golf complex respectively;
- it will be necessary to use on average up to 30 tons or 308 kg per ha of mineral fertilisers per season for maintenance of the golf course with the total area of 96.39 ha; it is planned to develop the seasonal lawn fertilisation schedule every year;
- it is planned to build a drainage system on the golf course to ensure collection of 80% of discharge in the 4 water bodies to be created in the territory and it is further planned to build monitoring wells to monitor quality of the discharge waters by detecting Ptot, Ntot, NO<sub>3</sub><sup>-</sup> and NO<sub>2</sub><sup>-</sup>;
- it is planned to use natural gas for heating in the boiler house of the golf complex and in the private houses;
- it is planned to make 8 artesian wells to ensure water supply to the golf complex;
- to water the golf course water will be used either from the artesian wells or from the 4 water bodies planned in the territory;
- to provide for treatment of the wastewater produced by the complex it is planned to construct a biological treatment facility of sufficient capacity and to provide for control of the output wastewater quality;
- it is planned to conclude agreements with licensed management companies for waste management;
- access to the complex is planned from the highway A9 along the road V1130 Kaķenieki – Slagūne, presently with gravel surface;
- movement of the existing road which presently crosses the territory of the golf complex and is placed between the road V1129 Naudīte – Slagūne – Upenieki and V1128 Dobeļe – Īle – Auce, preserving its public road status;
- it is planned to build the road V1130 with NP7.5 with asphalt surface
- it is not expected that as a result of the planned activity air quality standards will be exceeded;
- the traffic-generated noise level in the residential areas adjacent to A9, V1130, V1129 and V1128 ("Vekteri", "Lielkrogi", "Lejiņas" and in part of Kaķenieki, "Klāvindriķi", "Virsaīši", "Krogzemji", "Cepļi" and in part of Slagūne) already at the moment exceed the specified maximum values for environmental noise. The Environmental Impact Assessment Report specifies implementation of measures for reduction and prevention of discomfort in the territories of nearest residential buildings;
- to retain the landscape in the construction plots it is planned to retain the existing relief to the extent possible, to preserve forest zones in the lower parts of the relief and separate groves, to retain the wet hollows and the streams joining such, to retain to the extent possible the old trees, stone clusters, former dwelling locations, to plant greenery along the roads.

#### 4. Examined Documentation

- Results of the initial environmental impact assessment by Jelgava Regional Environmental Office of the State Environment Service and the appended materials – 22 pages.
- The decision No. 485 of 1 October 2007 by State Bureau for Environmental Supervision on conducting the environmental impact assessment procedure for the planned activity– 4 pages.
- The letter of 20 November 2007 by SIA "Incom Network Rīga" and the appended materials for preparation of the Environmental Impact Assessment Program – 13 pages.
- The application-request on 5 December 2007 by I.Bērziņa and 10 more interested parties to provide for the initial public discussion of the environmental impact assessment for the planned activity – 3 pages.
- The letter No. 3-01/2853 of 7 December 2007 by the State Bureau for Environmental Supervision addressed to SIA "Incom Network Rīga" with a request to provide for the initial public discussion of the environmental impact assessment for the planned activity – 1 page.
- The application of 9 December 2007 by A. Krūmiņš with a request to provide for the initial public discussion of the environmental impact assessment for the planned activity – 1 page.

- The minutes of the initial public discussion of the environmental impact assessment of 27 December 2007 and the appended materials – 10 pages.
- The Program of 14 January 2008 of Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort" in Annenieki and Naudīte Rural Districts, Dobele District – 6 pages.
- The Working Report of the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort", 1 volume, 177 pages.
- Summary of the Working Report of the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort" – 11 pages.
- Minutes of 4 September 2008 of the public discussion of the Environmental Impact Assessment Working Report and the appended materials – 17 pages.
- The application of 10 September 2008 by I. Bērziņa in relation to the Environmental Impact Assessment Working Report prepared by SIA "Estonian, Latvian & Lithuanian Environment" – 1 page.
- Expert opinions on the Working Report – 6 pages.
- Final Report on the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort", 1 volume, 205 pages.
- Final Report on the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort" containing classified information, 1 volume, 209 pages.
- The letter No. 3-11/5 of 7 January 2009 by Annenieki Rural District Council in relation to construction of the golf complex – 1 page.
- The letter No. 2/1-23 of 14 January 2009 by Dobele District Council in relation to the Final Report on the Environmental Impact Assessment of the golf complex construction – 1 page.
- Expert opinion regarding the Final Report – 6 pages.

#### **5. Opinions and Arguments by the Interested Parties Summarised from the Process of Assessment of the Planned Activity (Including the Results of the Public Discussion)**

The informative materials about development of the golf complex "Timberland Hills Golf resort" in Dobele District, in the real property owned by SIA "Incom Network Rīga" in Annenieki and Naudīte Rural Districts were available: at Annenieki Rural District Council, Skolas iela 2, Kaķenieki; at Naudīte Rural District Council, "Ziedugravas" 5, Naudīte; at Jelgava Regional Environmental Office of the State Environment Service, Kazarmes iela 17a, Jelgava and at State Bureau for Environmental Supervision at Rūpniecības iela 23, Rīga.

Within the period specified under the law 12 applications by interested parties were received for organisation of the initial public discussion of the environmental impact assessment of the planned activity.

The initial public discussion of the planned activity took place on 27 December 2007 at Annenieki Rural District Council. 25 interested persons participated in the discussion. The representative of SIA "Incom Network Rīga" provided the present with information on the planned activity and answered questions. The present persons were interested in the vacancies at the golf complex, in the prospective number of visitors at the complex, in the options of access of the complex, movement within the territory and access to the properties surrounded by the territory of the golf complex and expressed the opinion that these properties will be isolated from the outer world; asked who the planned single-family homes were intended for; were interested in the prospective construction deadlines and the sequence of construction of the objects. A participant of the discussion asked about the prospective location of the planned wastewater treatment facility and pointed out that its location was marked 300 to 400 m away from his property and also indicated that not all property had been marked in the border plan. Another participant was interested in the possibility for other property to be connected to the utilities network (electricity, gas, water, sewerage) of the golf complex and about participation of the local authority in the golf complex project. The possibilities of movement of residents during construction were asked about. The representative of SIA "Estonian, Latvian & Lithuanian Environment" informed the participants of the discussion about the key aspects to be evaluated in the environmental impact assessment. The participants of the discussion were interested in who specified the requirements for the content of the environmental impact assessment and asked where information about the environmental impact assessment would be available and whether the

sociological poll would be conducted. A participant of the discussion was interested in the possible waste management of the waste generated by the complex.

On the basis of the application by SIA "Incom Network Rīga" and the results of the initial public discussion the State Bureau for Environmental Supervision prepared and issued on 14 January 2008 the Program of Environmental Impact Assessment for Construction of the Golf Complex in Annenieki and Naudīte Rural Districts in Dobeles District.

To elucidate the attitude of the population towards the planned activity the opinion poll was conducted from 25 April to 7 May 2008 of those residents of Annenieki and Naudīte Rural Districts who live or whose property is situated within the radius of 3 km around the territory planned for the complex. Direct interviews were conducted with 98 respondents of whom 83% reside in the said territory permanently while 17% come during the season or on holidays. 13% of the respondents live in the direct neighbourhood of the golf complex territory (up to 500 m), 14% live in the distance of 500 m to 2 km, 5% - in the distance of 2 to 3 km and 68% - more than 3 km away. In total 74% thought that the territory of Annenieki Rural District is in need of as variable and fast business activity as possible, 10% of the respondents thought that it is better to restrict business activities in the territory while 13% did not have an opinion in this regard. 3% of the respondents recommended development of country tourism and biological farming. The majority of the respondents were dissatisfied with the present condition of roads, availability of medical services, public transport, as well as provision with shops and other services. Only 15% of the respondents thought that at the given time there were no sports and active recreation options. 56% of the respondents were informed about construction of the planned golf complex, 35% had heard something about it, while 6% did not know about it at all. The location was found suitable for the planned activity by 64% of the respondents and 56% also generally supported construction of single-family homes and cottages. Respondents hoped that the infrastructure would be improved and the road Kaķenieki – Slagūne would be asphalted, jobs would be created and the local authority's budget would improve. 41% of the respondents were concerned about the possible negative environmental effect (flora and fauna, changes in groundwater level, dust) with 26% indicating concretely the possible impact due to wastewater, while 17% mentioned impact on the especially protected nature areas. Respondents indicated that there were no plans for construction of either a kindergarten or school and were concerned about increase in the number of people which might harm the environment. In general the construction of the golf complex with the hotel was supported by 63% of the respondents, 16% were against it, but 21% did not have any opinion. Construction of cottages and residential complex was supported by 47% of the respondents, 29% were against it, but 24% did not have any opinion.

The Working Report on the Environmental Impact Assessment for Construction of the Golf Complex "Timberland Hills Golf resort" was prepared by SIA "Estonian, Latvian & Lithuanian Environment" and on 19 August 2008 SIA "Incom Network Rīga" submitted it for examination to the State Bureau for Environmental Supervision.

The Working Report on the Environmental Impact Assessment was available to the public: at Jelgava Regional Environmental Office of the State Environment Service, Kazarmes iela 17a, Jelgava; at Annenieki Rural District Council, Skolas iela 2, Kaķenieki; at Naudīte Rural District Council, "Ziedugravas" 5, Naudīte; at Dobeles Regional Council, Brīvības iela 15, Dobeles and at State Bureau for Environmental Supervision at Rūpniecības iela 23, Rīga.

The public discussion of the Working Report on the Environmental Impact Assessment took place on 4 September 2008 at Annenieki Rural District Council. 21 interested persons used this possibility provided by the law to participate in public discussion of the Working Report. The representatives of SIA "Estonian, Latvian & Lithuanian Environment" informed those present about the environmental impact assessment report. A participant asked about placement of the wastewater treatment facility and about where the treated water would be drained in, indicating that the ditch intended for discharging the wastewater was a national drainage ditch crossing his property and wanted to know about further solution of this matter; he indicated that the Report did not provide information about smells which might come from the wastewater treatment facility, indicating that there were three dwellings near the square intended for construction of the treatment facility, while below the planned wastewater outlet there were two fish ponds, and he was also interested in why the treated wastewater could not be used for watering the golf course. Another participant was interested in the source of funding for asphaltting the rural district's roads necessary for the golf complex; it was asked how the migration of wild animals would be ensured because the Report

provided information that there was high density of cloven-hoofed (artiodactyl) animals in the territory. The participants were interested in how the objects to be ensured by the local authority, for instance, outpatient service, school and kindergarten, would be created and managed in relation to development of the golf complex which included construction of residential houses; one resident wanted to know how the creation of water bodies was planned – by blocking the existing streams or by digging new ones, indicating that if the stream near the border of his property was blocked a big part of his territory would be flooded. A participant of the discussion expressed an opinion that the residents were not against construction of the golf course and the hotel, but that they were against construction of the residential buildings. The owner of the country household "Rūjas" pointed out, in his turn, that the buffer zone of the micro-reserve was marked in his parcel of land and construction was planned in the distance of 50 m from his border, and he indicated further that construction of the houses was designed rather as in the new villages in the suburbs of Riga than in a scattered way as in Mežaparks, and he also wanted to know whether the hillock behind Pūre Pond would be levelled. Another participant indicated that to access his property he was presently using the road through "Rūjas" or through the forest from the direction of "Pastari" and was puzzled about the way of reaching his property in the future. The discussion participants were interested in the possible inconvenience during the construction and expressed concern about the need to transform 130 ha of agricultural land, wanted to know who would pass the decision regarding the option of development of the golf complex in the concrete territory, how many job positions the complex would give, when the construction of the complex would start and when the road would be asphalted. A discussion participant was strongly concerned about his property being surrounded by the golf complex thus isolating him and that any utilities whatsoever would have to be taken across the territory of the golf complex to access his property.

During the examination of the Working Report the State Bureau for Environmental Supervision received an application by I. Bērziņa expressing an opinion in relation to construction of the golf complex "Timberland Hills Golf resort" planned by SIA "Incom Network Rīga" and expressing concern about the possible impact of the planned activity on the nature values – plants, animals, amphibians and birds, considering that these aspects had not been sufficiently reflected in the Environmental Impact Assessment Working Report.

With reference to the application by I. Bērziņa and the opinions expressed by residents at the public discussion of the Environmental Impact Assessment Working Report the State Bureau for Environmental Supervision invited a freelance expert to examine compliance of the Working Report with the requirements set forth in the Program; prepared and on 9 October 2008 issued to SIA "Incom Network Rīga" an opinion about the Working Report on the Environmental Impact Assessment of Construction of the Golf Complex "Timberland Hills Golf resort" appending it with the application by I. Bērziņa and the expert opinions.

Considering the demands and proposals expressed by the State Bureau for Environmental Supervision, I. Bērziņa and the residents, the Final Report on the Environmental Impact Assessment of Construction of the Golf Complex "Timberland Hills Golf resort" was prepared and on 19 December 2008 submitted for examination to the State Bureau for Environmental Supervision.

The Final Report was available to the public: at Jelgava Regional Environmental Office of the State Environment Service, Kazarmes iela 17a, Jelgava; at Annenieki Rural District Council, Skolas iela 2, Kaķenieki; at Naudīte Rural District Council, "Ziedugravas" 5, Naudīte; at Dobele Regional Council, Brīvības iela 15, Dobele and at State Bureau for Environmental Supervision at Rūpniecības iela 23, Riga, as well as at internet websites [www.timberlandhillsgolfresort.com](http://www.timberlandhillsgolfresort.com) and [www.vidm.gov.lv/ivnvb](http://www.vidm.gov.lv/ivnvb).

During examination of the Final Report the State Bureau for Environmental Supervision received:

1. A letter by Annenieki Rural District Council in which it is indicated that the Council does not have any objections against construction of the golf complex.

2. A letter by Dobele District Council in which it is indicated that the Council does not have any material objections in relation to the Final Report prepared by SIA "Estonian, Latvian & Lithuanian Environment".

## 6. Mandatory Conditions and Measures to be Taken in Further Designing

The Final Report and the Opinion regarding it by the State Bureau for Environmental Supervision have to be submitted to Annenieki and Naudīte Rural District Councils. The mandatory conditions and measures to be taken in further designing apply only provided the approval of implementation of the planned action prescribed by Section 21 of the Environmental Impact Assessment Law is received according to the procedure specified by the Cabinet of Ministers Regulation No. 355 of 2 May 2006 "The Procedure of Approval of the Planned Activity".

The mandatory conditions and measures to be taken in further designing:

- The initiator of the activity, in cooperation with Annenieki and Naudīte Rural District Councils, has to ensure inclusion of the development of the golf complex "Timberland Hills Golf resort" in the territorial plans of the rural districts.
- Matters of transformation of agricultural lands should be resolved in compliance with the requirements set forth by the Cabinet of Ministers Regulation No. 619 of 20 July 2004 "Procedure of Transformation of Agricultural Land into Non-agricultural Land and Issue of Land Transformation Permits".
- Matters of transformation of woodlands should be resolved in compliance with the Cabinet of Ministers Regulation No. 806 of 28 September 2004 "Regulation of Woodland Transformation".
- As specified in the Report, to ensure protection of the micro-reserve by correcting the planned border of the golf complex by moving it for at least 350 m, as well as by restricting and preventing entrance into the micro-reserve from the complex and by prohibiting unauthorised movement in it.
- As specified in the Report, not to perform construction works in the territory adjoining the micro-reserve during the nesting season.
- As specified in the Report, it is necessary to retain the valuable forest stands in the parcels of land "Krišjāņi", "Rogas" and "Saulieši" and the detected especially protected biotopes in forest plots No. 41, 42 and 19.
- As specified in the Report, use of such wastewater treatment facilities should be provided for which would ensure the necessary wastewater treatment degree also with uneven input loads and load fluctuations during different seasons, as well as considering the planned project implementation at several stages.
- In further designing the maximum permitted values in relation to total phosphor and nitrogen concentration in the wastewater discharged from the treatment facility should be specified considering the preferred wastewater outflow location, water quality in the concrete recipient drain and its self-treatment capacity, especially during periods of low waters, preventing the possibility of occurrence of adverse effects outside the complex territory.
- In further designing the possibilities to fill the artificial water bodies in the territory of the golf complex and provision of the amount of water necessary for watering the lawn from these water bodies should be specified.
- The planned activity must not worsen the hydrological situation of adjoining territories, therefore the expected site preparation and levelling works should be planned accordingly, with consideration of the directions of existing water flows and their prospective changes.
- It is necessary to develop annual seasonal lawn fertilisation schedules and provide for regular monitoring of discharge water quality by regularly submitting the monitoring results to Jelgava Regional Environmental Office of the State Environment Service and the local authorities.
- To ensure compliance with the air quality standards in the territory adjacent to the road V1130 the road must be asphalted.
- Any works related to the road V1130 Kaķenieki – Slagūne should be approved with the State Culture Monument Protection Inspectorate.
- Accessibility of the property "Rūjas" which is surrounded by the territory of the golf complex should be provided for.
- In further designing the residential buildings which are within the noise discomfort range of the roads necessary for provision of operation of the golf complex should be specified and, as stated in the Report, the anti-noise measures must be taken to ensure compliance with the laws and regulations.
- Technical environmental protection regulations should be requested from and received at Jelgava Regional Environmental Office of the State Environment Service.

- A sequential and detailed work performance schedule should be developed in order to cause the least possible discomfort for the traffic participants and neighbouring residents, as well as to ensure accessibility to properties during construction.

### **Decision of the State Bureau for Environmental Supervision**

With consideration of the abovementioned information and Section 20 Paragraph (1) of the Environmental Impact Assessment Law, the State Bureau for Environmental Supervision decides to recommend it to the Councils of Annenieki and Naudīte Rural Districts to evaluate the solutions planned in the Final Report on the Environmental Impact Assessment, the situation established in and conditions set forth by this Report and to decide on further development of the construction design of the golf complex "Timberland Hills Golf resort" according to the conditions set forth in this Opinion and ensuring compliance with the applicable laws and regulations.

The Opinion on the Final Report by the State Bureau for Environmental Supervision can be appealed to the Ministry of Environment within one month after the date on which this Opinion takes effect.

Bureau Director

A. Lukšēvics

30 January 2009