



National Environment Management Authority

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ENVIRONMENTAL IMPACT ASSESSMENT STUDY REPORT FOR THE PROPOSED AMALGAMATION OF PLOT L.R. NO.6247/1 AND 6247/2, SUBDIVISION INTO FIVE (5) PORTIONS INCLUDING L.R NO 1353 (LOTUS ISLAND), AND CHANGE OF USER OF L.R NO.1353 FROM AGRICULTURAL TO RECREATIONAL USE IN NAIVASHA SUB-COUNTY, NAKURU COUNTY.

Pursuant to Section 59 of the Environmental Management and Coordination Act CAP 38, the National Environment Management Authority (NEMA) has received an Environmental Impact Assessment Study Report for the above proposed project.

The proponent, **Kijabe Hill Estate Limited**, proposes to do Amalgamation of plot L.R. Nos. 6247/1 And 6247/2, Subdivision into Five (5) Portions Including L.R. No. 1353 (Lotus Island), And Change of User of L.R. No. 1353 From Agricultural to Recreational Use, within the Lake Naivasha basin, in Naivasha Sub-County Nakuru County.

The following are the anticipated impacts and proposed mitigation measures:

IMPACT	MITIGATION MEASURES
Scope misuse and prohibited works	<ul style="list-style-type: none"> Maintain an explicit non-developmental scope statement and non-works rule (no construction, earthworks, shoreline works, dredging/reclamation, vegetation clearance, abstraction, or discharge); Embed a Prohibited Works Schedule in all land leases, contracts and service arrangements; signed acknowledgements and induction.
Uncontrolled change and baseline drift	<ul style="list-style-type: none"> Define the baseline operating profile as the compliance reference (use type, timing, visitor ceilings, routes, activity nodes); Implement change-control and trigger screening for any deviation from baseline; Maintain change and trigger registers with written determinations; Stop unapproved changes; Treat any uplift that increases disturbance, expands footprint, or introduces new stressor pathways as out-of-scope and subject to fresh approvals where required.
Footprint expansion and access diffusion	<ul style="list-style-type: none"> Confine recreational activity to L.R. No. 1353 only; Restrict mainland parcels to interface/support use only; Define controlled access points and routes and prevent route proliferation; Apply boundary patrols, hotspot checks, and photo evidence;
	<ul style="list-style-type: none"> Close informal routes using lawful non-invasive controls; Apply sanctions for repeat breaches. Controls should prioritise littoral and wetland edge areas that become exposed during low-water phases, since these zones are most vulnerable to trampling and rapid vegetation turnover driven by lake-level fluctuation.
Biodiversity, riparian and shoreline sensitivity	<ul style="list-style-type: none"> L.R. No. 1353 (Lotus Island) has been used for low-intensity recreation by Naivasha Yacht Club members for about 90 years while remaining registered as agricultural land, and the proposed change of user does not introduce a new activity but formalises an established, private members-only sailing and club use within the Lotus-Crescent lagoon setting where the Club has long co-existed with wildlife and high bird diversity; Management shall prioritise shoreline and riparian protection under lake-level variability by treating littoral margins as high-sensitivity zones, maintaining a zoning map and zone register, activating low-water protocols (route closures, rerouting, temporary no-go micro-sites) when exposed substrates are vulnerable, enforcing strict conduct rules (no feeding, no harassment, stay on routes) with controlled viewing distances, restricted night activity, stewarding and rapid intervention, and maintaining fixed-point photo monitoring to distinguish hydrological change from any use-related disturbance.
Pollution and incident risks from existing tenant operations (outsidescope of proposed activity)	<ul style="list-style-type: none"> Continue existing waste handling, collection, and lawful disposal; maintain housekeeping and servicing routines; maintain zero discharge to the lake; Incident reporting and clean-up where applicable. Confirm non-developmental scope is maintained, verify no discharge and no new waste streams linked to the proposed activity, and retain basic compliance evidence for inspection, including "N/A" statements where domains do not apply to the proposed activity.
Safeguards misconstrued as approval to intensify	<ul style="list-style-type: none"> State clearly that biodiversity safeguards, waste controls, and access management are compliance measures for an existing baseline and do not authorize intensification; Confirm no new waste streams, new discharge pathways, or expanded activity footprint occur under the non-developmental approval.
Stakeholder, compliance capacity and auditability risk	<ul style="list-style-type: none"> Maintain consistent scope messaging; Implement a grievance mechanism with timelines and closure evidence; Induction and refreshers covering prohibited works, zoning, conduct rules, and lake-level sensitivity; Peak-period supervision; Maintain minimum registers with document control; Monthly compliance summaries and quarterly reviews; Closed-loop corrective actions with escalation and regulator referral for material breach.

A full report of the proposed project is available for inspection during working hours at:

- 1. Director General**
National Environment and Management Authority (NEMA),
Popo Road, off Mombasa Road
P.O. Box 67839-00200,
NAIROBI.
- 2. County Director of Environment,**
NAKURU COUNTY.

A copy of the EIA report can be downloaded at www.nema.go.ke

NEMA invites members of the public to submit oral or written comments within thirty (30) days from the date of publication of this notice to the Director General, NEMA to assist the Authority in the decision making process for this project. Kindly quote ref. No. **NEMA/ENVIS/SR/00431**

Comments can also be e-mailed to info@nema.go.ke

DIRECTOR GENERAL

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