

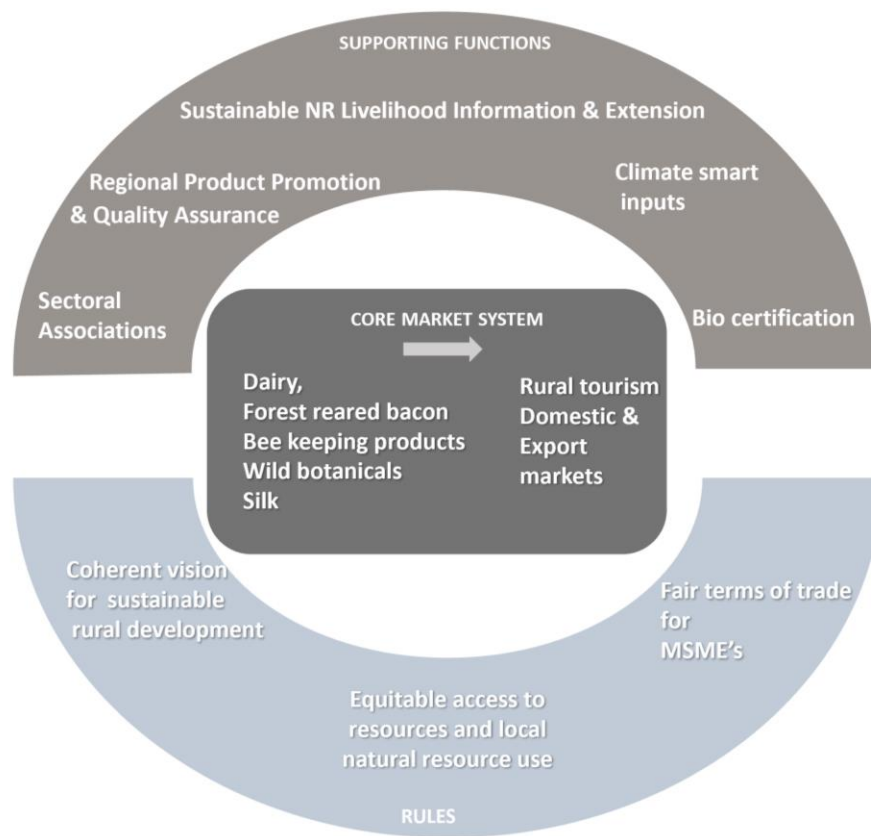


Improving Access to Equitable Decision Making
for Sustainable Local Development

GODERDZI FRIENDS ADVOCACY INITIATIVE

AUGUST 2024

Alliances Caucasus 2 runs from May 2022 to April 2026 with a budget of 6 million CHF. It is a market systems development programme funded by a consortium of donors, the Swiss Development Cooperation (SDC), Sweden and the Austrian Development Cooperation. It targets rural producers in Georgia, working in the rural product core market system and with associated supporting functions and rules. Its purpose is to increase incomes and improve livelihoods through better, sustainable productivity, resilient market access, local employment opportunities and **more equitable inclusion in local natural resource use**. Implemented through the lens of environmental sustainability and Gender Equality and Social Inclusion (GESI) **it seeks to augment the lives of rural inhabitants through developing their knowledge of the value of rural resources and the potentiality of the environment in which they live. It will increase their participation in decision making concerning these resources and the availability of knowledge, inputs and skills to enable them to profit sustainably from them.** It will tap into and further build a sustainable platform for rural producers to participate in added value, export and tourism markets.



Rural Producer Market System Diagram with Areas of Intervention

Introduction

The Goderdzi Friends Initiative is part of the ALCP2's work on ensuring that rural citizens are provided with improved access to more equitable local decision making regarding the environment in which they live through improved provision by local institutions. The ALCP2 is concentrating its efforts on the Goderdzi Pass in Ajara as it already has a foothold in multi stakeholder discussion surrounding environmentally sustainable development through the development of the Goderdzi Alpine Garden.

Goderdzi Friends

In 2021, with ALCP2 facilitation a stakeholders' group was created, who closely studied an announcement made by MEPA on August 5th, 2021, which included a 'Scoping report of the Strategic Environment Assessment of the Development of the Goderdzi Resort Nearby Territory'. On August 26th, the group sent initial collective feedback in the form of a signed letter to promote transparent, inclusive and constructive dialogue concerning the future development of the Goderdzi Resort. Eleven stakeholders signed the letter. A response letter from MEPA was received on September 24th 2021, stating that their concerns would be considered in future planning. To continue the advocacy process, discuss and evaluate the response received from MEPA, the signatory stakeholders decided to formalize an initiative group under the Memorandum with the name of *Goderdzi Friends*, which unites members of the Goderdzi stakeholders' group and invited experts/specialists, regional and local government representatives, private sector and representative of the local communities in Khulo. All the activities related to the Goderdzi advocacy are conducted by this group.

Goderdzi Friends Signatories:



A SHORT OVERVIEW OF THE GODERDZI FRIENDS ADVOCACY INITIATIVE

In June 2023, it emerged that a draft large-scale plan, the **Beshumi Resort and Goderdzi Pass Development Masterplan**¹ (Thereafter, the Goderdzi Masterplan) for the development of the Beshumi Resort and Goderdzi pass had been announced for legally mandated public feedback on Khulo Municipality's website. The development of the document and its publication were not widely known or publicized. The Masterplan included the development of substantive green field sites in prominent locations of outstanding beauty around the head of the Goderdzi Pass as well as developing the existing popular resort of Beshumi, which was the first Goderdzi site to be developed and an example of uncontrolled ad hoc development.

The Alliances Caucasus Programme 2 (ALCP2) facilitated conservation and environment stakeholders to actively participate in the revision of the plan to ensure as many environmental safeguards are included as possible.

In August 2023, with ALCP2 facilitation, local initiative group Goderdzi Friends² together with the Batumi Botanical Garden, Iliia State University, World Wildlife Fund (WWF) worked under the Goderdzi Friends Initiative to review the Goderdzi Master Plan and Strategic Environmental Assessment documents, which were published by Khulo City Hall. In September 2023, Goderdzi Friends visited the Goderdzi Pass with ALCP2, regional and local government officials as well as the plan's architects to visit the proposed sites and then participated in public hearings, which were held by Khulo City Hall, the Ministry of Finance and Economy of Ajara (MOFEA) and National Environmental Agency (NEA) to present, discuss and collect feedback from public.

As a result, in October, 2023 comprehensive comments and recommendations were drafted and sent to the above-mentioned governmental entities. Intense facilitation with Goderdzi Friends resulted in halting the process of approving the Goderdzi Pass Development Master Plan, In October 2024, the NEA issued a report based on the Goderdzi Friends recommendations document, and the MOFEA had to resubmit the Strategic Environmental Assessment document according the report's recommendations.

In January 2024, the MOFEA resubmitted a supposedly improved version of the Strategic Environmental Assessment document to NEA. In March 2024, Goderdzi Friends attended a public hearing of the document in Khulo and resubmitted their concerns and recommendations to the NEA as it still lacked consideration of some of their recommendations. In April 2024, the NEA approved the Strategic Environmental Assessment document issuing recommendations, which are based on Goderdzi Friends recommendations and are [published](#) on Environmental Information Portal³. In July 2024, Khulo Municipality Sakrebulo approved the Goderdzi Pass Development Masterplan based on the NEA approval of the Strategic Environmental Assessment document from the National Environmental Agency.

A summary of the recommendations formulated by Goderdzi Friends is provided below.

¹ Developing and approving a masterplan is a way to plan the future of an area over the long term as it sets out the vision for an area, capturing a wholistic view of how it should evolve, and includes a roadmap for managing development and growth over that time. A Masterplan gives information on planned developments in the area, sets regulations for those developments detailing what is allowed in the planned area and what is restricted.

² Black Sea Eco Academy (BSEA), Mtirala and Machakhela Protected Areas Friends Association (BSEA), Environmental Association Psovi, Geographic Travel Ltd, Eco Tours Georgia Ltd, Eco Films Ltd, Caucasus Environmental NGO Network (CENN), Association Flora and Fauna, Association Green Sector, Association of Organic Farming Elkana, NGO Green Step, NGO Environment and Development, NGO The Regional Environmental Centre for the Caucasus (REC Caucasus), Association for Promotion of Environment and Sustainable Development Mta-Bari

³ Online Portal of Environmental Information and Education Center (EIEC) of the Ministry of Environment Protection and Agriculture of Georgia (MEPA)

A SUMMARY OF THE RECOMMENDATIONS to the Masterplan of Beshumi Resort (With Adjacent Territories) - Goderdzi Pass Area, and the three areas included in this Area – Beshumi Resort, Shkernali District and Goderdzi Pass And its Strategic Environmental Assessment (STEA) Report submitted to National Environmental Agency of the Ministry of Environment Protection and Agriculture of Georgia, the Ministry of Finance and Economy of Ajara and Khulo Municipality City Hall in March, 2024.

Goderdzi Pass has one of the best and most unique landscapes in Georgia and has a great tourist potential, therefore its development is a necessary and irreversible process. The main goal of Goderdzi Friends involvement in this process is that this development is safe, sustainable and seen in a long-term perspective for both the environment and people, which will contribute to the setting of chaotic development in order, the correct use of existing natural resources, the diversification of tourism and the economic empowerment of the local population.

The natural processes developed in the territory of Georgia in the recent period clearly showed us once again that it is necessary to consider the dangers and risks of natural disasters, protection and rational use of natural resources at the initial stage of any development planning. Our comments and recommendations relate to the following issues: geology and geodynamic processes, hydrogeology and water resources, expansion of the Goderdzi Alpine Garden and protection of the surrounding subalpine forests, management of forests in the resort area, development of eco-tourism infrastructure and necessity of using local authentic architecture archetypes in new constructions. We believe that all of them are equally important and must be included in the Beshumi Resort and Goderdzi Pass Development Masterplan and its Strategic Environment Assessment document.

Replacing Chaotic and Random Constructions with Pre-planned Development

The Masterplan identifies three planning units/areas where active development is planned, but nothing is said about the development outside this area, which has sprung up in a chaotic manner over the past few years. We think that the approval of the Masterplan in this form will further activate the current chaotic development process and make it unmanageable. Houses are built so densely that there are cases where they are placed without access or because of the minimum distance between buildings, and they may damage each other during the process of snow melting in the spring. The current situation has made it clear that prohibitions without guidance do not work, and it is necessary to make decisions that, on the one hand, will help the citizen to carry out the construction process legally, and on the other hand, development will have a framework and suburban, marginal, chaotic processes will no longer deepen.

We recommend adding information in the Masterplan on how the already populated areas will be managed, where construction will be allowed for locals and where there will be restrictions. It is advisable to check the structural stability of the buildings in the already developed areas, and in the future to consider the minimum balance units of the intensity of the residential areas, the architectural appearance of the buildings, the construction solutions and energy efficiency.

Infrastructure Planning

- The maximum preservation of the natural landscape is one of the important components in the planning of new territories, which should create harmony with the cultural landscape, therefore, it is necessary to mark the points/locations of public panoramic views in the Masterplan and assess in detail how the said panoramic views will be maintained and freely accessible to all visitors. According to the planning, the construction of uncharacteristic, non-authentic buildings for the region should not be allowed, which will help the space to remain open and the views available to all visitors.
- It is mandatory to develop building design prototype based on local materials and authenticity. For this, it is necessary to add information about the local architecture to the Masterplan document, and for new constructions, in the form of an appendix, recommend analogies, which will be used by the local municipality's mayor's office as a criterion when issuing a construction permit.
- The new infrastructure should be harmoniously arranged with the local landscape and consider the local authentic architecture, the tourist areas should be selected and accordingly planned in such a way as to reduce the negative

impact on the environment caused by the development. The surrounding area of Goderdzi Alpine Garden has high tourist potential. In this regard, it would be advisable to plan an eco-educational tourist infrastructure in the vicinity of the garden.

- Hybrid tracks and cable cars - based on the fact that the Masterplan area is strategically designed for the concept of a 4-season resort, it is desirable to analyze the possibilities and recommend the arrangement of cable cars and bike tracks (so-called downhill) during the infrastructure planning process of the winter resort for a 4-season resort, to ensure their operation throughout the year. In particular, the mentioned hybrid technologies involve the installation of special mobile bike mounts on the cableways, which are removed during the winter and installed again for the summer season. Similarly, the tracks are used for skiing in winter and for cycling in summer. The introduction of these technologies is not associated with high costs, while the economic benefits are twofold. In the traditional winter resorts of Austria, Switzerland, France, after climate change and adaptation to it, summer incomes are already significantly higher than winter incomes. It should be noted that without these solutions, the crisis of winter resorts around the world is inevitable.
- Intra-resort and regional bicycle tracks - it is welcomed that the Masterplan focuses on green transport and the development of an additional, priority tourist-recreational element in the form of bicycle paths. In addition, it is desirable to fully understand and utilize the existing potential in this regard, which goes beyond the scope of the resort and involves the development of regional, national or international bicycle tracks. Our recommendation is that the document should focus on the connection of bicycle paths with the Batumi-Akhaltshikhe bicycle track, which is popular for bicycle enthusiasts, and the integration of bicycle paths that already exist in Adjara (bicycle path network).

Urban Development and Architecture

- The recommended color tone presented in the Masterplan (low intensity gray, pastel (when selecting any color) tone) is an insufficient regulatory framework and risks further fragmentation of the developed environment. The request for pastel colors is general and does not guarantee that the roofing system will create an artistic aesthetic image of the development as a whole complex. Therefore, if the surrounding environment does not allow for the establishment of a dominant color tone, it is desirable that the development management regulations develop an acceptable color palette.
- The stylistic solution of the buildings according to the selected areas should be determined, which will help to perceive the development or specific areas as a single complex. The system of roofs plays a big role in shaping the appearance of the settlements on the sloped terrain. The document can determine the necessity of slanted roofs and the minimum rate of slanting, which will respond to the architectural form typical of the mountainous area and at the same time will not create the need for artificial removal of snow during exploitation. In order to maintain the unity of the roofs, it is necessary to determine the percentage limit of the arrangement of the usable area on the roof and the color palette of the roofs.
- The list of materials to be used on building facades does not take into account climatic conditions. The use of metal on facades in the basement is unsustainable. In addition, it is not advisable to cover the ground/first floor with wood, because considering the climate of the project areas, the wooden facades of the buildings will be covered with snow in certain periods of the year. This will lead to rapid damage of materials, and this factor will have a negative impact on the general appearance of settlements. Paving with natural stones becomes more aesthetic and attractive during operation, while being resistant to harsh climates. The recommendation to use wood for the rest of the floors should remain unchanged.
- In order to promote the economic empowerment of the locals and the systematic development of the environment, it is possible to issue a recommendation to announce an open architectural competition with the involvement of the municipality, for the purpose of purchasing small hotel projects, which the municipality will give as a gift to interested persons. The mentioned experience exists in Georgia on the example of Tbilisi, when individual housing projects were purchased, which helped to increase the aesthetic value of architectural projects and the environment.
- The representation of infrastructure objects in the list of basic information about city-building measures is not in aesthetic and stylistic conformity with each other. It is desirable to include similar objects in the common architectural system, which will become a kind of accent for the development of the environment and will contribute to the systematic and composite development of the environment.
- Decisions and restrictions related to appearance and style are a long-standing practice of developed countries, which play a major role in shaping the orderly appearance of populated areas and maintaining the authenticity of the established environment.

- The permissible 20% of the total area of informational and/or advertising signs/boards, inscriptions and other similar elements applies in the big cities of Georgia, while the same regime is excessive for the project area. This creates a danger that the environment will be overloaded and more intensively perceptible facades for the human eye around the roads will develop chaotically, in addition, the visual accents will move from the landscape and unique environment to the advertising facades. It is recommended to reduce the percentage and choose a color palette suitable for the recommended architectural materials.

Geology and Geodynamic Processes

- A detailed engineering-geological study must be carried out before the approval of the Strategic Environmental Assessment document (SEA) and the Masterplan because landslides and active erosive processes are observed on one of the development sites (the slope on Goderdzi Pass). According to the document, development is planned on the slope, which means that ground masses will be cut, the load will increase, and the slope may be destabilized. The slope is prone to the development of landslide processes and the danger is high. The table of the plan of measures presented in the SEA document (threats point 4, p. 258-259), it is indicated that "best practices" will be used to conduct the mentioned studies, as well as "investment in the project" will be implemented and only "before the start of construction".
- The geological part of the report should describe in detail the geodynamic processes developed at the study sites (landslides, rockfall, floods, avalanches, erosion), their genesis, recurrence potential and hazard category. The information on the geodynamic processes given in the SEA report is not detailed, for example, the zoning scale of the "Geological Risks Map" is not sufficiently detailed, and it is also unclear on what basis the zones marked on the map were allocated. Therefore, it is necessary that the SEA report should contain maps where the hazard zoning of the project area will be marked (it is necessary to delineate the local areas with the following types of hazards through geo-information systems on each project area through a polygonal layer: landslides, rockfalls, mudslides, floods, avalanches, Erosion, etc. It is necessary to assign a low, medium or high hazard category to each polygon, and through the identification number, a description/analysis of the process should be presented in the text and the type of mitigation measure should be planned.

Water Resources

- Development of new areas and development of resort will have a direct impact on water resources (quality and quantity) and may jeopardize the water supply of the local population, cause conflict between the locals and cause large financial losses to businesses. For example, as a result of the development of the Goderdzi resort, there is already the issue of a lack of water resources, there is a certain risk that the local population will be left without water resources, therefore it is necessary to determine the amount of existing water resources, how much additional water will be needed, how much water is planned to be consumed in case of maximum load and make predictive calculations. For predictive calculations, it is necessary to evaluate the existing water resources, therefore, it is necessary that studies are already given in the SEA document and future perspectives analyzed and evaluated.
- The issue of utilizing water resources must be done with the involvement of local people, their opinions and advice considered, because water is a key resource and there is a risk that local people will be left without this resource. It is necessary to conclude before the approval of the SEA and the Masterplan that the risks are considered and the water resources are assessed based on relevant hydrogeological (underground and ground water) and hydrological (surface water) studies.

Management of Forests and Expansion of Goderdzi Alpine Garden

- The forests included in the development area and also the surrounding forests, which form unique subalpine forest ecosystems and are characterized by special sensitivity and vulnerability, mainly belong to the resort-recreational category forests due to their functional purpose. The main criterion for assigning the forest to the mentioned category is the existing masterplan for the area, which creates basis for the forest management plans. This implies the implementation of forest management regimes in the resort area and its surrounding area, which will contribute to the strengthening of the resort-recreational function of the forests.
- The Masterplan clearly presents the Goderdzi Alpine Garden (GAG) as an important part of the development area, and also emphasizes the diversity and importance of the habitats and vegetation present in the garden, however, the issue of expanding the natural boundaries of the GAG is not raised in the SEA report and the table of the action plan.

Based on the importance of biodiversity of the GAG, it is necessary to make a note in the Masterplan and the SEA document that the natural boundaries of the Goderdzi Alpine Garden will be expanded, and the surrounding subalpine forests will be given the status of a protected forest, which will create a buffer of natural ecosystems and a support area for the garden. Zoning will be carried out on the basis of the Resolution No. 427 of the Government of Georgia regarding the approval of the Forest Code and the Regulation on Forest Registration System, Categorization and Monitoring Rules.

- It is stated in the SEA document, that "the establishment of a forest-park near Beshumi resort will contribute to the development of the high-mountain tourism infrastructure of the Adjara region", although this is not reflected in the table of the action plan, therefore, it is necessary to add this. Also, it is necessary to clarify how the protection of the territory of the proposed park will be ensured before granting it the appropriate status (in accordance with the Forest Code of Georgia, probably the status of the resort and recreational forest category).
- In the list of structures/bodies responsible for issues related to the forest in the SEA report, together with the Ministry of Agriculture of Ajara, it is necessary to include the Ajara Forestry Agency, which exclusively manages forests in Ajara.

ANALYSIS AND NEXT STEPS

According to Government regulation N219 approval of Goderdzi Pass Development Master Plan along with detailed plans is a long process, which involves several stages. The first stage of approving concept of Goderdzi Pass Development Master Plan is completed by Khulo Municipality and the Ministry of Finance and Economy of Ajara. The next step is to present detailed plans to local citizens in Khulo for their opinions and recommendations. Therefore, approved Goderdzi Pass Development Master Plan is now being reviewed by Goderdzi Friends to see which recommendations were taken into consideration in the final Master Plan. *Advocacy will continue based on the review findings and the group are ready to issue additional recommendations to ensure their strong recommendation to start the development with improvements to the existing sprawl of Beshumi rather than the pristine and unstable slopes at the top of the pass.* In parallel, the group in partnership with a local initiative group [Khulo and Its Perspectives](#) will continue to advocate local citizens' involvement in next stages of decision making process and to inform local citizens on their environmental rights based on ALCP2 facilitated brochure, which will be disseminated through the Women's Rooms network and other rural hubs nationally.

Goderdzi Friends advocacy for protection of Goderdzi Alpine Garden is ongoing. Goderdzi Friends are now preparing a letter to the Forest Agency of Ajara asking for granting **Protected Forest Category status** under the Forest Code of Georgia to the forest that surrounds the garden, which will allow the process to be initiated. The forest around the Goderdzi Alpine Garden represents as one of the thirty-one high conservation value areas identified in mountainous Ajara that need to be preserved to prevent their destruction from erratic, unplanned and unregulated developments. These areas are marked on the [Biodiversity Map for Ajara](#) created as a result of biodiversity research facilitated by ALCP2 with the involvement of two members of the Goderdzi Friends. The map shows areas of high conservation value (including rare plant populations and protected areas, actual and proposed) in Ajara and is being used as a tool for supporting value creation.