

**CONSERVATION INTELLIGENCE:****LANDSCAPE CENTRAL**

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaibosch Nature Reserve Jonkershoek  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** **Alana Duffell-Canham**  
**telephone** +27 21 866 8000 **fax** +27 21 866 1523  
**email** [aduffell-canham@capenature.co.za](mailto:aduffell-canham@capenature.co.za)  
**reference** **SSD14/2/6/1/9/2/19909\_Water\_Reservoir\_Worcester**  
**date** **06 March 2020**

Heloise Groenewald  
Guillaume Nel Environmental Consultants  
PO Box 2632  
Paarl  
7620

*By email:* [hdp@gnec.co.za](mailto:hdp@gnec.co.za)

Dear Ms Groenewald

**RE: Proposed additional reservoir at the preloads reservoir system on remainder of Erf 19909, Worcester – Draft Basic Assessment Report.**

DEA&DP Ref: 16/3/3/6/7/1/B2/32/1433/19

CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:

1. The proposed additional reservoir location is adjacent to four existing reservoirs. According to the South African Vegetation Map (2018) the site supports Robertson Karoo vegetation. The botanical specialist concurs with this classification. Robertson Karoo is not currently listed as a threatened habitat type although it should be noted that there are finer-scale units within Robertson Karoo, some of which are more rare and threatened than others.
2. The site does fall within a Critical Biodiversity Area (CBA) which has been determined as such in order to protect the vegetation type on site, maintain an ecological corridor and to provide habitat for tortoise species and other small vertebrates.
3. The inclusion of some of the transformed areas around the existing reservoirs is not an error of not detecting certain features but rather an issue of scale. It should be noted that it cannot be determined by specialists or DEA&DP whether an area qualifies as CBA as CBAs have been determined at a province wide scale with many factors/features other than vegetation type and condition being taken into consideration. If CBA status needs to be queried it must go through the verification protocol developed by Cape Nature.

4. Page 7 of the report refers to “Critical Biodiversity Ecosystem” – this is not an official term. Should it perhaps rather state Critically Endangered ecosystem? In addition the botanical specialist refers to the “Worcester Biodiversity Network”. Please note that this is also not an official term or product. In the Western Cape only the City of Cape Town has a “biodiversity network” or “bionet” which has been added into the Western Cape Biodiversity Spatial Plan (WCBSP) 2017. The CBAs and corridors indicated in the specialist report is an extract from the WCBSP, which as mentioned above is a provincial product.
5. That being said, we do acknowledge that the site is partially degraded, adjacent to existing reservoirs and no new access roads will be required. We therefore do not object to the proposed additional reservoir providing that the following conditions are implemented:
  - An early spring/late winter (end July to mid-September) survey must be undertaken to determine if search and rescue of Species of Conservation Concern is necessary. *Ixia mostertii*, which is an Endangered geophyte has been recorded in close proximity to the reservoirs and although it was not recorded by the botanical specialist this could be an issue of seasonality.
  - No new roads/tracks should be created to the west of the proposed reservoir and natural vegetation should be allowed to re-establish post construction on all areas not required to access the reservoirs.
  - A site scan should be undertaken for tortoises and other reptiles prior to heavy machinery moving onto the site. These should be relocated by a professional familiar with these species.
  - Following this application, if additional reservoirs are required for Worcester, other site alternatives outside of Critical Biodiversity Areas should be investigated.
6. The Environmental Management Programme is highly generic and needs to be updated with site specific requirements.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alana Duffell-Canham