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**reference** SSD14/2/6/1/7/2/Water\_Pipeline\_Rooiels  
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Christoff Dippenaar  
Guillaume Nel Environmental Consultants (GNEC)  
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7620

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

Dear Mr Dippenaar

**RE: Proposed construction of a sub-surface water supply pipeline between Rooi Els and Pringle Bay – Draft Basic Assessment Report.**

DEA&DP Ref: 16/3/3/6/7/1/E2/33/1031/20

CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report for this application.

1. Although the pipeline route runs along the edge of an existing road it must be noted that the road itself is located in an area of high biodiversity and is of high conservation importance. The vegetation is Kogelberg Sandstone Fynbos which is Critically Endangered and is known to support a high number of Species of Conservation Concern (SCC). The route runs through an area which has been determined as aquatic and terrestrial Critical Biodiversity Area (CBA).
2. The freshwater study determined that there are no wetlands along the route only episodic drainage lines. However, it must be remembered that even though the road is not tarred it would still have interfered with natural flow patterns and connectivity between seepage areas and unchannelled valley bottom wetlands. It is for this reason that we request a follow-up walk-through by a wetland specialist in late winter (August) prior to any construction commencing to ensure that there will be no additional disturbance to areas which may impact on sub-surface hydrology. The previous site visit to determine watercourses and wetlands was conducted in late summer which is not ideal. Attention should be paid especially to the southern-most part of the route where multi-seasonal imagery (which was used for mapping of CBAs) indicates that wetland areas and water accumulation lines extend across the road and pipeline route.
3. We note that a detailed rehabilitation plan has been provided. We support this plan but if rehabilitation is not successful in terms of veld condition and species composition within 2 years after construction, additional mitigation measures will need to be investigated. We support the monitoring of the success of the

rehabilitation measures every three months following completion of replanting and seeding.

4. The River Maintenance Management Plan (RMMP) for the episodic drainage lines repeats a lot of information contained in the rehabilitation plan. Importantly, please remember that a RMMP does not allow for new infrastructure (e.g. gabions and weirs), only for repair and maintenance of existing structures. Therefore, please ensure that any new structures required are applied for as part of the Basic Assessment process. If the RMMP is intended to allow for replacement of sections of the water pipeline, it needs to clearly state this.

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

CC: Saa-rah Adams, Department of Environmental Affairs and Development Planning