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Bridgetown 7764**website** www.capenature.co.za**enquiries** Philippa Huntly**telephone** +27 021 866 8014**email** phuntly@capenature.co.za**reference** SSD14/2/6/1/9/3/844_Road_MR201_Paarl**date** 31 March 2020

Carina Becker
GNEC
P O Box 2632
Paarl
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By mail: carina@gnec.co.za

Dear Carina,

CapeNature comment on proposed upgrading of Main Road 201, Paarl, First Draft Basic Assessment Report.**DEA&DP Reference No: 16/3/3/6/7/1/B3/28/1156/19**

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

- 1) The application is for the upgrading of an existing road, MR201 (also referred to as the R301) to a dual carriage way of two lanes in each direction in the area between Paarl and Wemmershoek. The section of road to be converted to a dual carriage way traverses 29 properties (erven, farm portions and farms) as listed in the report and runs through four local municipalities: Witzenberg, Breede Valley, Drakenstein and Stellenbosch – all within CWDM. The proposed widening of the MR201 will include replacing / upgrading 27 culverts, three of which are located within watercourses.
- 2) The Screening Tool Report is provided along with the corresponding response report which is accepted from a biodiversity perspective.
- 3) With reference to priority biodiversity areas, the WCBSP 2017 is correctly reflected in the DBAR, the Botanical Specialist Report and the Freshwater Specialist Report: the MR201 traverses small areas of Critical Biodiversity Area 1 (CBA1) in the north and larger areas towards the south. CBA2 and Ecological Support Areas (ESA1) are traversed in the north and ESA2 areas are traversed intermittently along the route where streams cross the road via culverts.
- 4) The mapped natural vegetation in the study area is Swartland Alluvium Fynbos (Critically Endangered, criteria A1, irreversible loss of natural habitat) and Boland Granite Fynbos (Vulnerable, criteria A1 and D1: Threatened plant species associations). A thorough botanical assessment completed by Bergwind Botanical Surveys indicates that one species of conservation concern *Leucadendron corymbosum* (Vulnerable) was found in a seep. The botanist has indicated the area as MR201-14 in the botanical report as a sensitive area for special treatment. The botanist has recommended that seedlings of the threatened *Leucadendron corymbosum* that would be lost due to construction, should be relocated to similar habitat outside the construction footprint – this is supported and would need to be done under the guidance of a botanical specialist.

The botanical site assessment indicated the presence of three vegetation types: Swartland Shale Renosterveld (Critically Endangered, criteria A1 and D1) and the aforementioned mapped vegetation types of Swartland Alluvium Fynbos and Boland Granite Fynbos. The condition of the vegetation in the road reserve was found to be variable due to road maintenance and maintenance of the reserve itself via mowing and clearing. The condition on the adjacent farmlands was found to be highly disturbed with complete loss of indigenous vegetation.

The botanist has assessed that the anticipated direct impacts would be Low Negative to Very Low Negative for Boland Granite Fynbos; Medium to Low Negative for Swartland Shale Renosterveld and High to Medium Negative for Swartland Alluvium Fynbos. The findings of botanical assessment, No Go areas as stipulated and mitigation measures provided are supported. However the loss of Swartland Alluvium Fynbos remains a concern and it is suggested that, in the next phase of the process, the EAP explore further mitigation measures and / or alternatives to avoid the loss of this critically endangered vegetation type.

- 5) Potential freshwater impacts have been assessed by freshwater specialists Scientific Aquatic Services. The freshwater report indicates that two wetland features, a depression and a seep, will be directly impacted as a result of the development. To minimise the impacts on these and the watercourses it is considered imperative that all mitigation measures as provided in Section 6 and Appendix F of the freshwater report are incorporated into any authorisation and strictly adhered to. This includes the need for a wetland rehabilitation plan.

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

Yours sincerely



Philippa Huntly

For: Manager (Landscape Conservation Intelligence)