

SCIENTIFIC SERVICES

postal Private Bag X5014 Stellenbosch 7599
physical Assegaaibosch Nature Reserve Jonkershoek
website www.capenature.co.za
enquiries Rhett Smart
telephone +27 21 866 8017 **fax** +27 21 866 1523
email rsmart@capenature.co.za
reference SSD14/2/6/1/4/4/Waarburgh_MMP_Joostenbergvlakte
date 10 January 2019

Guillaume Nel Environmental Consultants
P.O. Box 2632
Paarl
7620

Attention: Carina Nel
By email: carina@gnec.co.za

Dear Carina

River Maintenance Management Plan for the Proposed Maintenance of the km 8.92 Culvert over the Mosselbank River, Waarburgh Road, Joostenbergvlakte (DEA&DP ref. no.: #)

CapeNature would like to thank you for the opportunity to comment on the application 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 application.

The application is for maintenance of the culvert for the Waarburgh Road over the Mosselbank River. The location of the culvert is classified as Other Ecological Support Area (ESA)/ESA 2 according to the Biodiversity Network for the City of Cape Town/Western Cape Biodiversity Spatial Plan, however directly downstream is classified as Critical Biodiversity Area (CBA) 1b/ CBA 1.

The maintenance proposal for this culvert is to retain the existing culvert structures in place, to remove debris as necessary and for replacement of the concrete apron slabs. The footprint will remain the same. The proposal will result in an improvement of the freshwater ecological value and functionality of the river.

A freshwater specialist study was undertaken which also included the section of the road between the R304 and R44 which is not included within the current application. Three freshwater feature crossings were identified for the current application, however the other two crossings are of excavated channels, which are not defined as watercourses according to legislation. Although these are excluded from the application, the recommendations must still be implemented, which will result in an improvement of the ecological condition.

It is noted that alien clearing has been included within the Maintenance Management Plan which is supported. It must be ensured that alien invasive species are eradicated within the road reserve, particularly at the watercourse crossings. This will also assist in preventing blockages of the culverts.

In conclusion, CapeNature supports the implementation of the MMP as proposed.

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

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

Yours sincerely

A handwritten signature in black ink, appearing to read "Rhett Smart", with a horizontal line underneath.

Rhett Smart
For: Manager (Scientific Services)