



Bergwind Botanical Surveys & Tours CC.

14A Thomson Road
Claremont
Cape Town
7708

6 May 2020

Guillaume Nel Environmental Consultants
45 Fabriek Street
Paarl
7646

Attention: Carina Becker

Dear Carina,

RE: 1st DRAFT BASIC ASSESSMENT REPORT: THE PROPOSED MIXED-USE DEVELOPMENT ON THE REMAINDER OF FARM NO. 845, SIR LOWRY'S PASS, WESTERN CAPE (DEA&DP REF. NO. 16/3/3/6/7/1/A3/53/2227/17)

You have requested that I respond to the comments from the letter dated 27 January 2020 from the City of Cape Town: Spatial Planning & Environment, Environmental Management Department with respect to the Botanical Assessment on the abovementioned property.

I have prepared a Compliance Statement in line with the "Protocols for the assessment and reporting of Environmental Impacts", GN No. 42946 dated January 2020 of the national Environmental Management act, 1998, No. 107, that is appended to the letter.

I strongly stand by the veracity of my findings in the submitted botanical report since there is no doubt in my mind that the subject property has been completely transformed by agriculture (horse-paddocks with planted pasture) and that the necessity for a follow-up spring survey would serve no purpose, even though the findings do not agree with the National Screening Tool data. The latter data is extremely "broad brush" and has no reference to the specifics of the site in question. In my professional capacity as a specialist botanist I question the validity of the National Screening Tool except as a guide as to what **MAY** be found on a given site. In fact, the screening tool has the potential to be extremely misleading and only 'on-the-ground' surveys, i.e. the work of specialists, such as myself, provide data that is representative of specific sites. With my experience I would not have hesitated to advise that a 'winter-spring survey' would be required had I deemed it necessary.

As for the question of and EMPr, the statement I made was in the context of my botanical findings and not on the site and the EIA process in totality. The point is taken that an EMPr for the site would be necessary for other than botanical reasons.



tel +27 21 671-4056 mobile 082-876-4051 e-mail dave@bergwind.co.za
web www.bergwind.co.za

TERRESTRIAL BIODIVERSITY COMPLIANCE STATEMENT:

As the appointed botanical specialist for assessment of the terrestrial biodiversity (botany) of **REMAINDER OF FARM NO. 845, SIR LOWRY'S PASS, WESTERN CAPE**, I hereby verify that:

Section 1.

- (a) I conducted a site visit on 18 November 2017 and found the farm to have no areas of natural fynbos vegetation, even viable fragments, due having formerly been a horse-farm with paddocks with planted pastures. All the natural vegetation that would originally occurred has been lost in the conversion to agricultural use.
- (b) The proposed development of the property would therefore have a very low to negligible impact with respect to any natural vegetation.

Section 2.

a. **Specialist:** Dr David J. McDonald, Bergwind Botanical Surveys & Tours CC, 14A Thomson Road, Claremont. Telephone: 021-671-4056; mobile – 082-876-4051.
SACNASP Reg. No. 400094/06 Ecological Science (Curriculum vitae appended)

b. Declaration of independence:

I David Jury McDonald, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- in terms of the general requirement to be independent:
- other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity;
- in terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).



tel +27 21 671-4056 mobile 082-876-4051 e-mail dave@bergwind.co.za
web www.bergwind.co.za

The farm (site) visit was conducted in early summer for a period of five hours to determine if there was any natural vegetation present, and if so, it's condition. The original vegetation that would have occurred was mainly Boland Granite Fynbos and to a minor extent Lourensford Alluvium Fynbos but neither of these vegetation types remain on the site.

The season of the visit had no bearing on the outcome of the assessment due to the transformed state of the site.

No assumptions were made, there were no limitations and no gaps in knowledge of the site.

Farm roads were followed and where necessary inspection was done on foot. A GPS was used to track the survey route and waypoints with notes and photographs were recorded.

Having applied the national web-based environmental screening tool the outcome for this site is that the 'PLANT SPECIES THEME' is MEDIUM SENSITIVITY and the 'TERRESTRIAL BIODIVERSITY THEME' is VERY HIGH SENSITIVITY.

Based on the field observations it is concluded that the property is entirely transformed and there is no evidence that it could revert to the former natural condition. The sensitivities as generated in the above screening tool are **inaccurate. The site is transformed**, and there is no scope for natural Boland Granite Fynbos or Lourensford Alluvium Fynbos ever to return.

No monitoring requirements from a botanical perspective for inclusion in an EMPr have been identified and since the intention is to develop within and already transformed site there would be no need to manage future impacts on any plant biota. It is therefore my opinion that development of the property would not negatively impact any natural plant community and would therefore not trigger any environmental regulations.

This compliance statement is not subject to any conditions and the proposed development is supported without any reservation.



Signature of the specialist:

**Dr D.J. McDonald Pr. Sci. Nat.
Botanical Specialist**

Appendix: Curriculum Vitae

Dr David Jury McDonald Pr. Sci. Nat.

Name of Company: Bergwind Botanical Surveys & Tours CC. (Independent consultant)

Work and Home Address: 14 A Thomson Road, Claremont, 7708

Tel: (021) 671-4056 **Mobile:** 082-876-4051 **Fax:** 086-517-3806

E-mail: dave@bergwind.co.za

Website: www.bergwind.co.za

Profession: Botanist / Vegetation Ecologist / Consultant / Tour Guide

Date of Birth: 7 August 1956

Employment history:

- 19 years with National Botanical Institute (now SA National Biodiversity Institute) as researcher in vegetation ecology.
- Five years as Deputy Director / Director Botanical & Communication Programmes of the Botanical Society of South Africa
- 14 years as private independent Botanical Specialist consultant (Bergwind Botanical Surveys & Tours CC)

Nationality: South African (ID No. 560807 5018 080)

Languages: English (home language) – speak, read and write
Afrikaans – speak, read and write

Membership in Professional Societies:

- South Africa Association of Botanists
- International Association for Impact Assessment (SA)
- South African Council for Natural Scientific Professions (**Ecological Science, Registration No. 400094/06**)
- Field Guides Association of Southern Africa

Key Qualifications:

- Qualified with a M. Sc. (1983) in Botany and a PhD in Botany (Vegetation Ecology) (1995) at the University of Cape Town.
- Research in Cape fynbos ecosystems and more specifically mountain ecosystems.
- From 1995 to 2000 managed the Vegetation Map of South Africa Project (National Botanical Institute).
- Conducted botanical survey work for AfriDev Consultants for the Mohale and Katse Dam projects in Lesotho from 1995 to 2002. A large component of this work was the analysis of data collected by teams of botanists.
- **Director: Botanical & Communication Programmes** of the Botanical Society of South Africa (2000—2005), responsible for communications and publications; involved with conservation advocacy particularly with respect to impacts of development on centres of plant endemism.
- Further tasks involved the day-to-day management of a large non-profit environmental organisation.
- **Independent botanical consultant** (2005 – to present) over 300 projects have been completed related to environmental impact assessments in the Western, Southern and Northern Cape, Karoo and Lesotho. A list of reports (or selected reports for scrutiny) is available on request.

Higher Education

Degrees obtained

and major subjects passed:

B.Sc. (1977), University of Natal, Pietermaritzburg
Botany III
Entomology II (Third year course)

B.Sc. Hons. (1978) University of Natal, Pietermaritzburg
Botany (Ecology /Physiology)

M.Sc. - (Botany), University of Cape Town, 1983.
Thesis title: 'The vegetation of Swartboschkloof, Jonkershoek,
Cape Province'.

PhD (Botany), University of Cape Town, 1995.
Thesis title: 'Phytogeography endemism and diversity of the
fynbos of the southern Langeberg'.

Certificate of Tourism: Guiding (Culture: Local)
Level: 4 Code: TGC7 (Registered Tour Guide: WC 2969).

Employment Record:

January 2006 – present: Independent specialist botanical consultant and tour guide in own company:

Bergwind Botanical Surveys & Tours CC

August 2000 - 2005 : Deputy Director, later Director Botanical & Communication Programmes,
Botanical Society of South Africa

January 1981 – July 2000 : Research Scientist (Vegetation Ecology) at National
Botanical Institute

January 1979—Dec 1980 : National Military Service

Further information is available on my company website: www.bergwind.co.za