

**OVERSTRAND**  
**ENVIRONMENTAL SECTION**



Navrae:  
Enquiries: Penelope Aplon

Datum:  
Date: 24 April 2020

Mr. Christoff Dippenaar

**GNEC**

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/via e-mail/

Dear Sir,

**1<sup>ST</sup> DRAFT BASIC ASSESSMENT REPORT: PROPOSED REHABILITATION AND UPGRADING OF TRUNK ROAD 28 SECTION 2 (TR28/2)(R43) AND RELATED EXISTING DEGRADED STORMWATER INFRASTRUCTURE (CULVERTS), BETWEEN STANFORD AND GANSBAAI, FROM KM 23.83 TO KM 43.88, WESTERN CAPE.**

The Environmental Management Section thanks you for the opportunity to submit comments on the above mentioned development.

**Biodiversity:**

The Whale Coast Conservation has done extensive research on the wetlands in the Stanford area. They have identified areas which serve as breeding sites for the Western Leopard Toad, which is classified as endangered. These sites are located between km 24.088 and km 24.198. It is recommended that this area should be investigated further by the freshwater specialist to determine what impacts the upgrades of the culverts and road will have on this species and its habitat. Mitigation measures must be put forward for the protection of the species.

**Waste Management:**

The Environmental Management Section aims to decrease the amount of land based litter which gets discharged into wetlands or the ocean, via the stormwater drain network. One of the tools used to reduce pollution is the installation of stormwater socks at stormwater outlets in partnership with the Dyer Island Conservation Trust (DICT). It is recommended that the Department of Transport and Public Works investigate the possibility of installing and servicing stormwater socks on outlets discharging into wetland systems.

**Rehabilitation plan:**Alien clearing:

It is recommended that Enviro-Glyphosate be considered as herbicide for cut-stump application. This herbicide is registered for use near water bodies. It is understandable that the alien clearing plan is also not linked to any timeframes as this is subject to EIA processes and Government budget cycles. However it is requested that a site map be included indicating the areas where alien clearing is planned. Chipping should also be considered as an alternative to dispose of biomass. The list of protective gear should include PPE for chainsaw operators.

**Recommendations:**

- 1) The impacts on the Western leopard toad must be investigated and mitigation measures must be proposed.
- 2) The installation and servicing of stormwater socks on the stormwater outlets discharging into wetlands must be considered.
- 3) Alien Clearing: Provide an alien clearing map. Consider chipping of biomass as an alternative means of disposal.
- 4) The rehabilitation plan is supported and it is proposed that the implementation there off be included as condition of the EA.

This office reserves the right to revise these comments based on the availability of additional information.

Kind regards,



Mrs Penelope Aplon

Environmental Manager

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