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reference SSD14/2/6/1/9/3/364_33_Dam_Ceres
date 11 August 2018

Inge Erasmus
EnviroAfrica
P O Box 5367
Helderberg
7135

By email: admin@enviroafrica.co.za

Dear Inge,

RE: CapeNature comment on Pre-App BAR for the proposed enlargement of Driefontein dam on portion 33 for farm Rietvalley 364 Ceres
DEA&DP Ref 16/3/3/6/7/1/B5/2/1358/17

CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments:

1. According to the Western Cape Biodiversity Spatial Plan of 2017 (WCBSP), there is a terrestrial Ecological Support Area (ESA) in the north eastern section of the farm however this is outside of the footprint of the proposed development. There are aquatic ESAs (Category 2) associated with the non-perennial streams which traverse the property and lead into the existing Driefontein dam. These have been correctly reflected in the report. The desired management objective for ESA 2 is to restore and/or manage to minimise the impact on ecological infrastructure functioning – in this case the non-perennial streams. There is potential for restoration of sections of the water courses and we support the recommendation made in the botanical report and reflected in the BAR.
2. As noted in the CapeNature comments of 22 Nov 2017, the mapped natural vegetation for this area is Ceres Shale Renosterveld which is listed as Vulnerable and is steadily declining to the extent that it almost qualifies as an Endangered ecosystem. Additionally, in terms of formal protection, this vegetation type is considered poorly protected. It is noted that the current status of the site is that it has been transformed by extensive and intensive agriculture over a long period of time with no significant natural vegetation remaining. This is reflected in the BAR and the botanical specialist report. It is noted that no new clearing will be done for infrastructure as existing roads and irrigation pipes will be used. It is noted that the footprint of the dam will remain similar to the existing footprint with extra capacity gained via excavation of the existing dam.

3. It is noted that the proposed expansion is planned in a phased approach and that the reason for expanding the capacity of the dam is to allow for 22ha of deciduous fruit orchards on previously cultivated land. Please provide clarity on the proposed time frame for Phase 2 and the rationale behind the phased approach.
4. Downstream cumulative impacts are a concern with all dam expansions and applications for new dams, particularly given the recent catchment wide increase in the number of applications for such. However in this case it is noted that the volume of water that is proposed to be stored in the Driefontein dam, after the completion of phase 1 and 2, does not represent any more water being extracted from the river than is currently being abstracted via a canal system. It is noted that the relevant Water Use Licence is valid as confirmed by BGCMA. For clarity:
 - a. Please indicate response to the CapeNature comment of 22 Nov 2017 regarding ecological flow requirements
 - b. Is the canal system to be de-commissioned once replaced by the dam?
5. Any invasive alien vegetation on the property needs to be cleared on a regular basis and any areas of erosion on the property need to be rehabilitated.

Please note that our comments pertain only to the biodiversity and ecological aspects of the receiving environment and not to the overall desirability of the application. 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 (Scientific Services)