

postal Private Bag X5014 Stellenbosch 7599
physical Assegaaibosch Nature Reserve Jonkershoek
website www.capenature.co.za
enquiries Chanel Rampartab
telephone +27 21 866 8017 **fax** +27 21 866 1523
email crampartab@capenature.co.za
reference SSD14/2/5/1/7/4/292-7_mast_Grabouw2
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EnviroAfrica CC
P.O. Box 5367
Helderberg
7135

Attention: Inge Erasmus

Dear Ms. Erasmus

Pre-application Basic Assessment Report for proposed 30 m high telecommunications mast: FA 292/7, Jagersvlakte, Grabouw
(DEA&DP ref: 16/3/3/6/7/1/A5/88/2134/18)

CapeNature would like to thank you for the opportunity to comment on the application for the erection of a 30 m telecommunications mast on FA 292/7, Jagersvlakte, Grabouw. CapeNature commented previously (ref: SSD14/2/5/1/7/4/292-7_mast_Grabouw) on the biodiversity value of the site. Please note that our comments only pertain to the biodiversity-related impacts and not to the overall desirability of the application.

According to the report, the site is 'completely disturbed with no natural areas remaining'. Historical satellite imagery shows that the site had been transformed; however, no active disturbance of soil (e.g. ploughing) appears to have taken place within the last decade. Note that the ESA2 status of the site accounts for this level of transformation (Western Cape Biodiversity Spatial Plan, CapeNature 2017). Although the development footprint is small (100 m²), it is important to note the following principle: transformed wetlands are still functional in terms of ecological processes; ecological infrastructure; and risk mitigation. Any further hardening compromises the ecosystem and compounds negative downstream effects, e.g. decreased capacity to mitigate floods and transport run-off; increased soil erosion; and increased introduction of non-point source pollution.

No alternative locations were presented; however, the southern section of the property just 60 m southeast of the proposed location will likely have a lower impact on the receiving environment because it falls outside both the mapped wetland and the ESA2.

CapeNature requests that an alternative location is considered; however, if the application is authorised as it stands, the development must take place in the dry summer months.

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

Yours sincerely



Chanel Rampartab
For: Manager (Scientific Services)

cc. Rhett Smart, CapeNature