

SCIENTIFIC SERVICES

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reference SSD14/2/6/1/9/6/415-Re_SR_Dam_Harmony_Ceres
date 31 October 2018

Inge Erasmus
EnviroAfrica
P O Box 5367
Helderberg
7135

By email: admin@enviroafrica.co.za

Dear Inge,

RE: CapeNature comment on Pre-Application Scoping Report for the proposed construction of the new Harmony Dam on Re of Farm Houdenberg No 415, Ceres.

DEADP reference number: 16/3/3/6/7/1/B5/2/1367/17

CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments. Please note that our comments pertain only to the biodiversity related impacts and not to the overall desirability of the application.

1. It is confirmed that our comments of 27 July 2017 based on the Background Information Document sent out at the time have been included in this, the Pre- Application Scoping Report for the construction of a new dam (Harmony dam) on the remainder of Farm Houdenberg 415 Ceres.
2. The main issue raised in the comments of 27 July was in relation to the proposed preferred alternative siting of Harmony Dam. It is not supported by CapeNature as it located within a proclaimed Mountain Catchment Area (Kouebokkeveld MCA). No activities which result in loss of habitat or alteration of water flow or quality should be permitted in MCAs. MCAs are of very high conservation value and should be treated and managed as formal protected areas. Runoff from this MCA assists in maintaining the water quality of the Houdenbeks River and groundwater recharge. It should be noted that a significant amount of water is already being captured by the dams in the Houdenbeks River and the many smaller dams in the Quaternary Catchment Area. It is also noted that a significant number of I&APs (including a Private Nature Reserve, private users and commercial users) have also raised concerns about impacts on downstream water supply upon which they are dependant.
3. As noted in our comments of 27 July 2017, CapeNature does not support new instream dams or enlargement of existing instream dams unless it can be shown that the ecological condition of the river/stream in which the dam is located can be improved and no significant terrestrial or aquatic habitat will be lost. It is noted that a Freshwater

Specialist and a Botanical Specialist have been appointed to conduct assessments and that the results of these studies will be used to determine the impact on terrestrial and aquatic habitat and on overall ecological condition.

4. There are two vegetation types mapped for the site of the proposed Harmony Dam. These are Winterhoek Sandstone Fynbos and Kouebokkeveld Alluvium Fynbos. Kouebokkeveld Alluvium Fynbos is categorised as Critically Endangered according to criterion A1: Irreversible loss of natural habitat. No further loss of Kouebokkeveld Alluvium Fynbos will be supported.
5. It is noted that a concurrent process is being followed for the Toeka Dam application on the same property and a separate but similar comment is submitted for that however the DEA&DP communication of 10th November 2017 recommended that one process be followed for both applications. Please confirm the reasoning behind the two separate processes.

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)