



**BASS DIII - PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT COMMENTS RECEIVED (08 March to 15 April 2021)**

Date	Issue	Comment	I&AP	Response	Respondent
	<b>Botanical/ Agricultural Areas</b>				
11 March 2021		The botanical specialist assessed several areas on the property that may be impacted by the proposed developments. He determined that Area 1 is still in a good ecological condition and therefore Area 2 should be the preferred choice for agricultural development. Area 2 is disturbed in its northern section. He has recommended that agricultural activities are focused in this northern section and CapeNature supports this recommendation.	Alana Duffell-Canham - CapeNature	Noted. Development of Area 2 is limited. Due to the topography, especially towards the eastern part of Area 2, development in Area 2 will be limited to an area directly adjacent to the edge of the existing centre-pivot agricultural (an area of 1ha). Area 1 will need to be developed to make the development, and the farm, feasible.	EnviroAfrica
		The "waaisand" area which is to be used as a source of sand for construction has been determined as a Critical Biodiversity Area as it is within a floodplain area. However, this area is not currently functioning as such and has already been previously disturbed. We do not object to the use of this area providing that the footprint is kept as small as possible and after construction is stabilised in terms of slope and groundcover.		Noted. This will be addressed in the EMP under site demarcation and rehabilitation.	EnviroAfrica
		Search and rescue has been recommended. Note that this does not necessarily reduce the impact ratings but can be considered good practice if the species are tolerant to relocation, a suitable receiving area is identified in advance; it does not create additional disturbance in areas which are in good ecological condition; and are to be kept natural; and the success of the plants is monitored and assisted as necessary.		Noted.	EnviroAfrica
		There are several quite outdated references in the botanical specialist report, it is only necessary to refer to these if the latest best available science is in contradiction to the findings on site. Nevertheless, we are satisfied with the findings and recommendations made by the botanical specialist based on the site visit and NBA 2018.		Noted	EnviroAfrica
	<b>Dam/Freshwater</b>				
11 March 2021		Thank you for providing information of all the sub-catchments in the study area. We note that the proposed dam will only receive water from one of these sub-catchments and that not all water will be captured by the dam. We therefore agree that given the nature of the watercourse and the ecological integrity that an Ecological Flow reserve is not necessary.	Alana Duffell-Canham - CapeNature	Noted	EnviroAfrica
		The dam wall and area surrounding the dam should be monitored to ensure that there is no erosion occurring.		Noted. This will be addressed in the Maintenance Management Plan (MMP) (Appendix H)	EnviroAfrica
		If additional water from the Breede River is abstracted this should only be done in the rainy season when flows are high in the river.		Noted. No additional water is to be extracted	EnviroAfrica
23 March 2021		Water resources are scheduled with CBRWUA and possibly being used to its full capacity. The applicant must provide a confirmation of water use on the property and clearly state the intention of the dam expansion and the water to be stored.	Vuyolwethu Maqala - Water Resources Management Unit - BGCM	The water resources as scheduled with CBRWUA can not be fully utilised without storage. A portion of the Scheduled listed water use is winterwater and if no storage is available, they are listed and paid accordingly without being able to make use of the water. The purpose of the application is to re-developed the property and to change the crops cultivated on the property. This will result in a lower crop/water requirement that will allow the applicant to cultivate a larger area. As example the current irrigation area is 129,7ha @ 7450m3/ha/a= 966 265m3/a. The proposal is to cultivate 90ha blueberries, 30ha existing stone fruit trees. The crop/water requirement for blueberries is 5500m3/ha/a and stonefruit will require 7450m3/ha/a. This will result in a water demand of 718 500m3/a whilst the water availability is 1 125 076m3/a.	EnviroAfrica

		The BGCMA does not have a registration on file for a dam or additional water uses. The property has a Validated for water use, which did not include a dam. A possible dam site is indicated on the google earth imagery, but it is unclear what the size of the dam is.		All water taken from the Breede River which has an enlistment is controlled by the Central Breede WUA. They keep record and water is metered with telemetric instruments. As soon as they reach their allocation, water will be cut-off and they will no longer be able to take water from the river. This is also applicable according to the scheme operational rules applicable to all water users that have a Scheduled Listed Allocation from the Breede River.	EnviroAfrica
		The applicant has to submit a Water Use Licence Application (WULA) via the Electronic Water Use Licence Application and Authorisation System (e-WULAAS) before the proposed agricultural and dam expansion proceeds as accordance to Section 117 © of the National Water Act, 1998 (Act No. 36 of 1998) for dam safety as this proposed development will trigger the following water uses of Section 40 of the National Water Act, 1998 (Act No. 36 of 1998).		Noted	EnviroAfrica
		All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to.		Noted	EnviroAfrica
		No pollution of surface water or ground water resources may occur.		Noted	EnviroAfrica
		Storm water management must be addressed and applied both in terms of flooding and pollution potential.		Noted	EnviroAfrica
		All water uses must be metered and reported to the BGCMA as per Government Gazette, no. 40621, February 2017.		Noted	EnviroAfrica
		The construction of the dam as well as the use of any additional water, is deemed unlawful and will be punishable by law.		Noted	EnviroAfrica
	<b>EMP</b>				
		The Environmental Management Programme (EMPr) is quite generic. The most important mitigation measures to highlight with regard to ecological impacts are clear demarcation of the approved area for expansion, on-going erosion management during the construction phase (this needs to be more than "once-off" as stated in the EMPr) and operational phase and on-going clearing of alien invasive species throughout the farm. We support the recommendations linked to management of the remaining natural areas.	Alana Duffell-Canham - CapeNature	Noted. Additional erosion control and alien vegetation management is addressed in the MMP	EnviroAfrica