CapeNature

**CONSERVATION INTELLIGENCE: LANDSCAPE CENTRAL**

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**reference** **SSD14/2/6/1/9/6/1886&1887_erven_Pipeline_Wittebrug_Wolseley**
**date** **28 June 2023**

Maboee Nthejane
EnviroAfrica
PO Box 5367
Helderberg
7135

*By email*: maboee@enviroafrica.co.za

Dear Mr Nthejane

**RE: Proposed construction of a 2.5km pipeline on Erven 1886 & 1887, including a section through Wittebrug Nature Reserve – Draft Basic Assessment Report.**
DEA&DP Ref: 16/3/3/6/7/1/B5/2/1524/22

CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report for construction of a bulk water supply pipeline and wish to make the following comments:

1. A site visit was conducted on 26 June 2023 by CapeNature staff which included myself, Jeanne Gouws (freshwater ecologist), Antoinette Veldtman (Landscape Ecologist) and field rangers from the Hexriver Complex World Heritage Site which Wittebrug Nature Reserve forms a part of. Our comments are thus informed by the site visit as well as the documents which you have provided.

<u>Potential Impacts on freshwater ecology:</u>

2. Overall the freshwater report is lacking in some detail and based on our site visit there are a few factors that may need to be reconsidered:
   - On our site visit it was apparent that the floods of the week of 12th June overtopped the 1:100 year floodline.
   - The site is highly prone to erosion in sections with even the lower, flatter areas where it is proposed to bury the pipe having been washed away. The steeper areas are especially prone to erosion and removal of existing concrete pedestals and embankments is of high risk to the aquatic and terrestrial environment.
   - Cement is highly toxic to aquatic fauna and ideally should not be mixed on site, information on how the new pillars be secured into the ground needs to be provided. Use of existing pillars should be considered.

- The "staging yard" where equipment and materials will be stored must be kept outside of any flood lines of the Breede River (well beyond the currently indicated flood lines) on a previously disturbed area.
- We strongly agree that the new pipeline must blend into the environment where it is above ground. The current section of blue HDPE pipeline placed along a section from the weir is not acceptable.
- No abstraction upstream of the weir pool should be allowed.
- Despite the ELU, an Ecological Reserve assessment should be conducted for the Tierhokskloof River to determine how much water needs to remain in the tributary during the summer months. This should apply to all weirs which should make allowance for ecological flow releases (many weirs in the Breede and its tributaries will probably have to be repaired after the June 2023 floods and could be adjusted during this process).
- It needs to be clarified if any flow diversions will be required. For example, for the upgrade to the pebble trap with a concrete floor.
- The freshwater specialist study should have included a SASS survey of the Tierhokskloof River as well. SASS equipment can be carried by one person if needed and correctly packed. Information regarding fish species is also based on historical data and not a recent fish survey.
- In his SASS graph, the specialist also doesn't indicate into which level 1 Ecoregion and zone their SASS site falls. This is not general practise and therefore does not give a proper indication of the results obtained.
- We do not agree with the low significance ratings given to both the Tierhokskloof and Breede Rivers (page 34) not the low ecological importance scores. Statements such as "*The rejuvenation of the Tierhokkloof water abstraction won't have a marked deleterious impact on the Breede River, as there are numerous other similar streams feeding the Breede River higher up in the catchment*" on page 26 of the report can not be made without a comprehensive hydrological assessment of the entire catchment (Upper Breede as well as Tierhokskloof),

<u>Potential Impacts on vegetation:</u>

3. The report states that the new pipeline will be placed "within 10 metres" of the existing pipeline, this could mean a significance difference in assessed and habitat as the slopes are steep and to clear an additional servitude where a pipeline can be placed will require a lot of vegetation removal and cutting into the slope. This has extremely high erosion risk in addition to loss of indigenous vegetation. Where the pipeline is on stilts, it should be replaced like for like and where it is buried under the current hiking trail it should be placed above or immediately adjacent to the old pipe, not more than a metre from the existing pipeline. Where the exiting pipeline is buried, it should remain in place as removing it will create a high amount of disturbance. The new pipeline should not be placed closer to the river at any place than the current pipeline is located.

4. Due to nature of the environment in which construction of the pipeline will take place we do not agree that the impacts will be low even if they are relatively localised. It must be remembered that although the current pipeline has been in place for decades, the primary landuse of the surrounding area is conservation. Vegetation clearing needs to kept to the absolute minimum required and no new access tracks or trails should be created.

5. In terms of fauna, it can also be confirmed that leopard do frequent the kloof – camera traps have taken photographs.

<u>Environmental Management Programme:</u>

6. A clear method statement needs to be provided as to how the heavy materials will be transported. Access is only possible on foot but the logistics needs to be clearly outlined.

7. A clear method statement detailing removal of old structures needs to be provided.

8. These method statements will need to be reviewed and approved by CapeNature prior to any materials or equipment being placed on site.

9. The appointed independent ECO will need to visit the site more than 4 times during the project, they should visit at least fortnightly and the environmental officer should be present daily. Both ECO and EO must be fit enough to patrol and inspect the entire route.

10. CapeNature reserves the right to inspect the section passing through Wittebrug Nature Reserve with no prior notice needed.

11. Timing of works is important. Construction should be completed in the dry summer season but any welding works should not be permitted on high fire risk day (orange or red level). This information can be obtained from the local Fire Protection Agency (FPA).

12. Any damages to the natural environment within Wittebrug Nature Reserve will also need to be restored to CapeNature's satisfaction.

13. Alien clearing should only be done within the site disturbed during construction and done carefully to prevent erosion. The site should be rehabilitated and stabilised using locally indigenous vegetation.

14. Broken structures, pipelines (plastic and asbestos/cement) and other equipment must be completely removed.

Please also refer to Annexure A below for site observations.

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

Yours sincerely

Alana Duffell-Canham

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**Annexure A: Photographs from site visit**

Plates 1a, 1b and 1c: Photographs near weir of blue plastic pipe which is precariously placed and needs to replaced with a pipeline that blends into the environment. It is not clear when this blue pipeline was installed.

Plates 2a and 2b: Where the existing pipeline is buried or partly buried such as in these sites it should be left in place to prevent erosion.

Plate 3: The existing support structures are quite substantial and should be reused if possible to minimise disturbance and reduce rubble that has to be removed from site. No additional structure should be built on the river side of the existing structures.

Plate 4: Discarded pipes and "braai" observed near the weir. Broken pieces of cement/asbestos pipe were also observed along the trail.