

Maboee

From: Maboee <maboee@enviroafrica.co.za>
Sent: Monday, 05 June 2023 03:28
To: 'Marc Caplan'
Cc: 'Margaret | Enviro Africa'; 'Natasha Bieding'
Subject: RE: EIA comments re: Melkboom 384 Vanrhysdorp proposed water storage dam on the Olifants s10 km's south of Klaver
Attachments: 20230512-Comments-Env Draft Scoping-New Wave Dam-KV final^Mannex-signed.pdf

Dear M. Caplan,

Please note that the terrestrial ecology concerns that you have raised in connection with the proposed development have not been indicated as concerns at all by CapeNature and CapeNature is the legally mandated custodian for nature conservation in the Western Cape Province.

Furthermore, the concerns that you have raised in connection with water-related matters and the Olifants River as an aquatic ecosystem have not been raised as concerns at all by the National Department of Water and Sanitation ("DWS") and the DWS is the legally mandated custodian for water issues in the country.

Please find attached hereto for your convenience, a copy of the water use licence issued by the DWS for the proposed development.

Should you still wish to participate in the public participation process for the application, you will be provided with further opportunities to participate during the Environmental Impact Reporting phase of the application.

Kind regards,

Maboee Ntshajane



Agricultural Extension Services (AES)

remsmc@gmail.com

Tel 071 414 4198

Ref: 1st Comments Melkboom 384 offstream storage dam/Klawer

14/5/2023

Hello Environ Africa
info@enviroafrica.co.za

Comments on Melkboom 384 Vanrhysdorp proposed water storage dam on the Olifants river ±10 km's south of Klawer

Regarding the above EIA, AES is an interested and affected party, that is concerned about;

- 1) the scientific terminology used in two of the specialist reports and
- 2) catchment management objectives that need inclusion, for more streamlined approach to natural resource conservation.

There are a number of pertinent questions (bullet pointed) for the EAP to answer.

Summary

The absence of evaporation studies (in this EIA) shows that the dam would lose more water that is worth while holding, as summer temperatures are in the mid 30° C. for several months. Look at most temperature graphs for the area for the last 30 years. Hence, fresh water is better conserved in the river flow, if the banks of the Olifants and the riparian areas are vegetated with indigenous trees and shrubs. The trees and shrubs provide shade, not always over the entire width of the river, but enough to reduce evaporation. The water in the river under 1m from the surface is a normally cooler to that in dams (further reducing evaporation), due to the movement of the water and the shading from trees.

Bodies of water such as dam's along an East - West Biodiversity Corridor (CES 2019), is going to attract itinerant birds, mammals and herpetofauna (amphibians and reptile), For instance perhaps some farmers would like to keep all but waterfowl and waders out of storage dam areas. However porcupines, Bat-eared Foxes, African Striped Weasels, mongeese and even lizards can find their way under or through gaps in the shade cloth reinforced fences. These animals then draw in predators. In the case of reptiles (herons & raptors, genets, wildcats) while, mongeese and Striped Polecats may become attracted to chicken coops, ducks and goslings. The farmer is then apposing the Districts plans for a safe biodiversity corridor for indigenous flora and fauna. The more fences the less movement of itinerant terrestrial animals and the more animals are channeled towards certain resources that are not included in the planning documentation. Where are Cederberg Farming (Pty) Ltd 's chicken/ fowl; coops located? Would the specialist consultants indicate them on maps.

- Catchment management specialist study on the amount of water lost during evaporation and leakages needs to be determined. Is the mean average surface area 4000 m², at estimated capacity needs to be included in the report?

According to Aquatic specialist report by D. Driel, the stretch of the Olifants river is listed as a NFEPA (on the SANBI Website.) In terms of the Western Cape Biodiversity Spatial Plan, the Olifants River aquatic and riparian zones has been listed as a CBA. Hence all human activities must be outside of the CBA, and above the 1 in 200 year flood level (required too optimize future land use for water catchment and soil conservation act. CBA's ensure that, downstream demands for potable H₂O (during growing and fallow seasons) are obtainable!!

- CBA's are there to protect humans from their own worst enemy – greed. - Pas waterbeperking toe

Species diversity in the river includes only fish species!?

Direct quote pg 22. “The Olifants / Doring River system is most important, as it is home to fish species on the IUCN RED List of endangered species (Table 5). Most of these fish species are encountered in the upper tributaries. The Clanwilliam yellowfish do not occur in the Olifants River in the vicinity of the New Wave Dam anymore. Likewise, the Clanwilliam sandfish is unlikely to occur in this river reach. Much scientific research is needed to illustrate the conservation value of the Lower Olifants River. It is therefore doubtful if the construction and the operation of the proposed New Wave Dam would in any way further compromise the status of any of these fish. The presence or absence of these fish cannot serve to discourage the construction of the proposed dam.”

“Endemic fish species have been decimated by exotic small mouth bass, an introduced and aggressive invader. This has probably done more damage than all of the other impacts combined, including agriculture.”

- What is the main predator of the small mouth bass and the next most & 3rd most common/ abundant indigenous fish species?

Outside of the riparian buffer zone and above the 1 in 200 year flood level

“The proposed dam is an off-channel dam. It is to be built outside of the riparian zone on land that has been farmed since the onset of agriculture in the valley. It is within the 100m buffer zone, for which approval is requested.” pg 27 Driel (2021) stands by, that the buffer zone of 32m from the riparian woodland/ shrubs needs to be respected, read statement below.

Recommendations

“The river and wetland areas to the north of the site must be regarded as **no-go areas**”, this must also include the 32m buffer zone. EAP consultants are to check reports for these types of statements.

- What is the scenario planning when if the Olifants has a low flow rate for several consecutive years?

New Flood levels (1:200 year) should be calculated for the highest risk zones. Natural vegetation should be seen within these zones so that floodplains are delineated, (DMP Matzikama Municipality 2022). Note: “DWS high hazard zones setback lines (flood level buffer zones) should take sea level rise, storm surges and spring tides into account, along the entire length of the Olifants River from south of Klawer. River corridors and wetlands, including ephemeral pans, must be protected from urban, agricultural and mining activities to a distance determined by a Cape Nature &/ or certified aquatic ecologist.” (Disaster

Management Plan, Matzikama Municipality 2022).

Possible impacts & Mitigation

"Irrigation dams are very aggressive aquatic habitats because of the fluctuating water levels." Pg 24.

- What type of engineered device is required so that fish and other aquatic fauna are able to swim upstream and downstream to exit the dam, before the water level leaves them vulnerable to isolation?

Pg 29 "The proposed New Wave Dam adds to the production of cultivated food"

- For whom is this food destined to be eaten by is a larger question, that stems from the IDP and SDP designed for the Matzikama district?
- Is the food for local human consumption ?
- What proportion of the total crop(s) is available in the Matzikama district ?
- List in order of what foods are most beneficial to the long term health of both young and old members of the human communities.

Water Supply Disruption pg 19 from (DMP Matzikama Municipality 2022)

"Provide incentives for water saving e.g. reduction in water use. "

- What incentives have been offered such as drip irrigation and or mulching, cover crops between rows?

Conclusions

"It is to be built outside of the riparian zone on land" pg 31 the amount of plastic if required for sealing the bottom of the dam is not mentioned, would S. Bester Ingineurs respond:

- How is the dam wall and the bottom to be prepared to prevent leaks?

The amount of evaporation is important factor as if the amount is more than 20-30% of the storage capacity of the dam, it may be better from a catchment management perspective to keep the water in the cooler river.

Comments on P.B. Consults Botanical Statement (2021)

This following statement from the summary, section, is short of moderated ecological sustainability. pg i " Although the proposed alternative will extent the footprint within 32m of the Olifants River it will optimize land use". Specialists botanists must become serious about his/her professional impact on water & land usages. Optimize land-use for real value, usch as biodiversity conservation and ecosystem services, particularly in CBA's. As both current and future predicted extraction rates in the lower Olifants are over the upper threshold of the sustainable yield; Certified and registered botanical consultants are required to safeguard the country's floral, soil and water (& ecological processes) assets for both wild animals and future humans, in order for sustainable resource management. Rather err on the side of sustainability and utilise precautionary principles - when making land-use alternative

decisions. No development with the 32 m buffer of from the riparian woodland (see Figure 4), it's National Law. One reason to respect the law is that former aquatic and riparian specialist (some scientists long since retired), pooled their expertise to arrive at a figure that protects wetland and riparian woodland, for 'normal ecological processes and functions to continue, for both upstream and downstream users, to withstand droughts, floods and wildfires. "As a result, it is not expected to have any impact on the ESA" direct quote pg 1. is unsubstantiated. The absence of detailed food web estimation by the botanical consultant voids the consultants above sentence as lacking sufficient evidence. Always consider that ESA's may have animals that stray out to the still or running water, in search of refuge, forage and prey.

A separate avifaunal study should include these preliminary findings

There are many species of waterfowl, waders and raptors that would potentially visit the isolated water body. The over 127 species of birds have been recorded in Olifants river estuary (Birdlife 2015), an Important Bird & Biodiversity Area (IBA), about 70 km's downstream. The lower Olifants river is a biodiversity corridor (CES 2019), that links, the estuary (60 sp of aquatic birds some that range up to the Clanwilliam area) with Cederberg IBA (adjacent to study site), has data for over 234 sp of birds (Birdlife 2015.) The Knersvlakte East-West biodiversity corridor is the terrestrial section of a larger corridor of free movement for terrestrial and coastal birds (see Figure 8.2 pg iv, in WDCM 2023). In this regard ;

- What are the densities, abundances and distribution of hydrophilic birds in the locality (50 km's radius)?

The species distribution data (below) is from BirdLife (2015) atlas summary, that requires an update.

Olifants River Estuary (ORE wetland IBA)

Namib-Karoo biome-restricted assemblage and other arid-zone species, including Karoo Korhaan *Eupodotis vigorsii*, Southern Black Korhaan Grey Tit *Parus afer*, Karoo Lark *Calendulauda albescens*, Tractrac Chat *Cercomela tractrac*, Karoo Chat *C. schlegelii*, Sickle-winged Chat *C. sinuata* and Black-headed Canary *Serinus alario*, Namaqua Warbler *Phragmacia substriata* occurs in the acacia thickets and the reedbeds along the river margin, and Cape Long-billed Lark *Certhilauda curvirostris* is also found here, particularly along the rocky northern bank. African marsh harriers were recorded to use the estuary for breeding and the Black harrier has been seen as an itinerant species. Common biome-restricted species include Cape Spurrow (Birdlife 2015).

Cederberg IBA

Fynbos and Karoo transition vegetation supports the following rare and endangered bird species to persist in the Cederberg; Karoo Long-billed Lark, Karoo Chat, Namaqua Warbler, Palewinged Starling, Black-headed Canary, Layard's Tit-Babbler and then Southern Black Korhaan, locally common Karoo Korhaan. Uncommon species in this category include Ludwig's Bustard, Karoo Lark, Sclater's Lark, Black-eared Sparrow-lark, Tractrac Chat, Sickle-winged Chat, Karoo Eremomela and Cinnamon-breasted Warbler., Black Harrier (*Circus maurus*) are rare itinerant residents. The Olifants riverine acacia woodland holds Namaqua Warbler (*Phragmacia substriata*). Karoo Long-billed Lark (*Certhilauda subcoronata*) occurs in rocky areas. Cape Spurrow occur in well vegetated shrublands (Birdlife 2015).

To allow geneflow for bird species to remain robust, reproductively successful at species and population levels, there needs to be safe passage from the Cederberg IBA to the ORE IBA. These species are most at risk as they require several, days/ weeks or even months to complete the journey successfully; Namaqua warbler, Karoo Long-billed lark, Karoo and Southern Black Korhaans, Tractrac chat, Black-headed Canary, Sickle-winged Chat Cape Spurfowl, and Black Harrier (a known frog predator).

Promote and protect heritage resources along the Olifants River Corridor are part of the Matzikama Municipality values. So is Biodiversity conservation, thus a continuous corridor between the mountains and the sea should be promoted. Especially along the historic farms of Vredendal, Melkboom and Windhoek (Matzikamma Streek, Disaster Management Plan, 2022).

Veld rehabilitation

Landowners should be encouraged to give their land to: conservation farming legacy status-categories 1-5, that may include tourism activities to provide income to manage the area, in accordance with biodiversity and soil conservation objectives.

Groete

(signature saved to conserve paper)

Marc Caplan (Principal)
Agricultural Extension Services (AES)

References

BirdLife (2015), Important Bird and Biodiversity Areas of South Africa. Johannesburg: BirdLife Republic of South Africa

CES (2019). Matzikama Local Municipality Draft Coastal Management Programme: Second Generation. Coastal & Social Advisory Services

P.B. Consult (2021), New Wave Dam - Trawal The Proposed Construction of a New Irrigation Dam on Portions 101 & 168 of Farm Melkboom 384, Vanrhynsdorp, Matzikama Local Municipality, Western Cape Province.

Driel D. (2021) Fresh Water Report, For the licensing of a proposed irrigation dam on Portion 101 and 168 of Farm Melkboom 384, Vanrhynsdorp RD, Sarel Bester Engineers, Ceres.

Disaster Management Plan, 2022, Matzikama Municipality IDP

WDCM (2023), Draft West Coast District Integrated Development Plan

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From: Marc Caplan <remsmc@gmail.com>

Sent: Monday, May 15, 2023 9:43 AM

To: Maboe <maboe@enviroafrica.co.za>

Cc: Margaret | Enviro Africa <info@enviroafrica.co.za>

Subject: EIA comments re: Melkboom 384 Vanrhydsdorp proposed water storage dam on the Olifants s10 km's south of Klaver

Good day Maboe & Magret,

According to the so called "Aquatic specialist report" The river is listed as a NFEPA. In terms of the Western Cape Biodiversity Spatial Plan, the Olifants River is listed as a CBA.

Attached are my comments for both provincial and national government departments, Plus for your team to ask the several specialists to answer the questions in the comments.

regards
Marc

On Tue, 18 Apr 2023 at 11:53, Maboe <maboe@enviroafrica.co.za> wrote:

Dear M. Caplan,

The Draft Scoping Report was submitted on 14 April 2023 to the Western Cape Department of Environmental Affairs and Development Planning as the relevant competent authority and not to the National Department of Forestry, Fisheries and the Environment.

The relevant competent authority and everybody else has been given at least 30 days, starting from 14 April 2023 to provide comment on the Draft Scoping Report as is required by the law. Once all comments have been received, the final Scoping Report including comments received and responses made concerning the comments will be submitted to the relevant competent authority for a decision on whether the application can proceed to the Environmental Impact Reporting phase.

Please read through the Terrestrial Biodiversity Compliance Statement Report and the Aquatic Biodiversity Assessment that form appendices to the Draft Scoping Report, as biodiversity issues are addressed there.

The proposed farm dam will be quite like any other farm dam in the surrounding area. The issues that you have raised do not constitute grounds for a public meeting.

Kind regards,

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From: Marc Caplan <remsmc@gmail.com>

Sent: Tuesday, April 18, 2023 11:03 AM

To: Maboe <maboe@enviroafrica.co.za>

Subject: Re: Melboom 384 Vanrhysdorp proposed water storage dam on the Olifants s10 km's south of Klaver

If the draft was already sent in to DFFE,

And they are waiting for comments.

Then why did your company advertise (in the paper) that I&A parties have until 17th May to respond?

There are issues with open storage dams.

1. Evaporation

2. They attract mammals to forage, waterfowl, waders & ducks may be welcome. But what about mongeese, otters, baboons, reptiles? Farmers must be prepared to live with those animals who are attracted to the surface water.

Animals are pulled away from less watered areas. Need protection tgerere are possibly dogs & hungry farm workers who would hunt small rare mammals.

That is why the farmer needs to be questioned at a public meeting.

Regards

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On Mon, 17 Apr 2023, 13:00 Maboe, <maboe@enviroafrica.co.za> wrote:

Dear M. Caplan,

Please be informed that the application form for environmental authorisation and the Draft Scoping Report with associated appendices for the above-mentioned development proposal were submitted to the Western Cape Department of Environmental Affairs and Development Planning on 14/04/2023.

The water to be stored in the proposed dam will be abstracted from the Bulshoek Dam Canal in accordance with an existing lawful water use allocation granted to the applicant by the Lower Olifants River Water Users Association that is revised periodically. A downstream water supply demand investigation is therefore not required.

In light of the fact that the water directed into the proposed dam will not be run-off per se, a catchment specialist study is not required.

The dam is proposed only so that more of the water that is lawfully allocated to the applicant can be stored and used for irrigation during dry summer months. At present, a large amount of the water that is lawfully allocated to the applicant remains unused and this leaves the crops of the applicant vulnerable during the last few weeks of the dry season when the crops are most sensitive and also during droughts.

The Draft Scoping Report and associated appendices is available for commenting via the link <https://we.tl/GrUoFbSU0n> and is also available on the website of EnviroAfrica, *i.e.*, enviroafrica.co.za/projects/for-public-participation/ and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

Should you decide to comment on the Draft Scoping Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, maboee@enviroafrica.co.za or info@enviroafrica.co.za and please specify in your letter of comment, your interest in the matter.

The commenting period on the Draft Scoping Report started on 14 April 2023 and ends on 19 March 2023.

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Agricultural Extension Services
Professional Natural Scientist (Ecologist)

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