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reference LE14/2/6/1/6/5/RE566&480-141_cemetery_Stilbay
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Sharples Environmental Services cc,
P.O. Box 443,
Milnerton,
7435

Attention: Ms Ameesha Sanker
By email: ameesha@sesc.net

Dear Ms Ameesha Sanker

PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT: PROPOSED EXPANSION OF THE MELKHOUTFONTEIN CEMETERY ON ERF 566 AND PORTION 141/480, HESSEQUA LOCAL MUNICIPALITY.

CapeNature would like to thank you for the opportunity to review your application for the proposed expansion of the Melkhoutfontein Cemetery, Still Bay. The proposed expansion will entail the following as extracted from the dBAR:

“The proposed expansion of the Melkhoutfontein Cemetery will entail the extension of the property by an additional 1.83 hectares, allowing the inclusion of an additional 1863 plots. The existing fence line, gravel access road, and water pipeline will be extended further South, into ERF 566, and a tap will be position at the southern-most point of this line, for provision of water. Proposed Scope of Works:

- *Demolish wall boundary (eastern and southern side of site) and erect new boundary wall around extension.*
- *Clear 8 339m² proposed extension on Erf 566 and Erf141/480 (combined).*
- *Extend existing access road, with gravel/asphalt finish.*
- *Implement stormwater management design specific to site.*
- *Rehabilitation with indigenous vegetation and rescued bulbs/cuttings from degraded fynbos.”*

Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (WCBSP 2017)¹ the site is mapped as Critical Biodiversity Areas (CBA 1: Terrestrial, Aquatic and River and CBA 2: Terrestrial)

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

and Ecological Support Areas (ESA 2: Restore). Non-perennial rivers flow along the southern boundary of the site and forms part of a Freshwater Ecosystem Priority Areas² River Corridor, climate adaptation corridor, and is mapped as part of the Southern Coastal Belt Watercourse Protection. The vegetation units present is **Vulnerable** Albertinia Sand Fynbos³ and Least Concerned Canca Limestone Fynbos⁴. The former will be listed as Least Concerned in the updated draft ecosystem threat listings for the updated National Biodiversity Assessment (2018).

Freshwater Habitat impact Assessment

We agree with the freshwater assessment that there are no aquatic habitats within the proposed cemetery expansion site. The assessment mentioned that the river ecosystem will not be disturbed if the No-Go zones are adhered to, however it mentioned in the conclusion that the wetland downslope could be impacted. Nonetheless, there might be some impacts from the construction phase, even though the impacts may be less and if the mitigation measures are implemented. It is important that all mitigation measures be implemented. Regarding Table 7 on the evaluations of potential impacts and reversibility (pages 30-31); we are unclear regarding the reversibility marked as “barely” if mitigation measures are implemented. Does this mean that if mitigation measures are implemented, the impact has limited reversibility? Sewage and chemicals must not enter the aquatic habitat thus the positioning of these facilities should be within the already disturbed areas and away from the watercourse. The contractors and municipal workers have to stay out of the No-Go areas and away from the 28m buffer of the watercourse.

Biodiversity Survey

The fieldwork for the biodiversity survey was undertaken during June, which is during the winter season, and not ideal for plant surveying as some geophytes, annuals and other flowering plants might have been missed. Using Google Earth Satellite Imagery, the site has been transformed over time, which agrees with the botanical specialist report. The survey recorded various plant species including two Species of Conservation Concern namely: *Aspalathus sanguinea* and *Leucospermum praecox*, endemics such as *Lampranthus fergusoniae* and *Acmadenia densifolia*, and protected trees *Sideroxylon inerme*. Even though the area is degraded, the local species are well represented and should be protected and restored after the operational phase. We support the comment that search and rescue should be done prior to construction and these species can be used during rehabilitation. In addition, a CapeNature permit would be required for plant and animal search-and-rescue. The botanical report mentioned that agricultural activities, developments and the increase in invasive alien plants are threats to the indigenous vegetation thus the mitigation measures should be strictly implemented as proposed by the specialist in order to minimize the disturbance footprint.

The property has *Sideroxylon inerme* (milkwood), which is a listed indigenous protected tree species⁵. Therefore, during the construction these trees should not be disturbed or damaged, without obtaining a permit from Department of Environment, Forestry and Fisheries (DEFF). Prior to construction carefully mark the trees that will be retained and have measures to protect these trees. Throughout the development, the impact on the protected trees must be minimal and they should be clearly marked during the construction phase.

² Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801.

³ National Environmental Management: Biodiversity Act (10/2004): National list of ecosystems that are threatened and in need of protection. 2011.

⁴ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

⁵ Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998)

The Species of Conservation Concern and local endemics should be translocated. Extreme caution should be applied during the relocation of the plants to ensure they are not damaged. Suitable micro-habitats must be identified and consider eliminating any threats to the plants, once relocated. A Botanical Specialist must oversee the process and determine a the correct season to give the plants an adequate chance to establish.

In terms of the Alien and Invasive Species regulations, specific alien plant species are either prohibited or listed as requiring a permit; aside from restricted activities concerning, *inter alia*, their spread, and should be removed⁶. The removal of invasive alien plant species must be continuous and around properties adjacent to the road and should continue beyond the operational phase. A site-specific invasive alien plant list should be compiled and outline the following:

- delineate the locations of invasive alien plants in relation to the development areas and illustrate this on a map;
- stipulate a timeframe and strategy for alien plant removal (which are potentially the best months of the year to destabilise and remove the alien plants, based on weather conditions/patterns);
- list potential methods of clearing (i.e. herbicides or cutting); and
- list the relevant indigenous plant species used for the rehabilitation (with accompanying photographs).

The aim of this process will be to provide the municipality with relevant information regarding which invasive alien plants should be removed. Followed by the re-vegetation, with indigenous plants. In terms of the rehabilitation, the municipality officials that will assist in the rehabilitation should be trained in terms of which indigenous plant species to collect, where these species can be locally found, how and what time of year to collect the seeds (or cuttings) and lastly state if the any planted vegetation should be irrigated and how frequent? The disturbed areas should also be rehabilitated after their operational phase.

Identify and label separate waste receptacles for different waste. Waste generated during construction and operational phases must be emptied regularly to ensure they do not overflow. Removal of waste and building materials must be disposed, offsite, at a registered disposal facility. Waste outside of the expansion footprint should also be removed during construction until post-operational.

During the clearing of indigenous vegetation and invasive alien plants, areas susceptible to erosion must be protected by installing the necessary temporary structures.

The Environmental Control Officer (ECO) should be present, if possible, during the clearing of alien invasive plant species and vegetation to ensure the implementation of the proposed mitigation measures and to identify any harmful activities.

In conclusion, the watercourse should be considered as No-Go areas and the 32m buffer must be strictly implemented. The removal of invasive alien plants must be continuous and indigenous fynbos species should be used during the rehabilitation. Protected trees should not be harmed during the construction and clearly marked if they would be retained or re-located.

⁶ National Environmental Management: Biodiversity Act 2004. (Act No.10 of 2004). Draft Alien and Invasive Species Regulations 2018. Government Gazette no. 112

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal flourish extending to the right.

Megan Simons
For: Manager (Landscape Conservation Intelligence)