

<b>Postal</b>	PO Box 26, Porterville, 6810
<b>Physical</b>	72 Voortrekker Street, Porterville, 6810
<b>Website</b>	<a href="http://www.capenature.co.za">www.capenature.co.za</a>
<b>Enquiries</b>	Ismat Adams
<b>Telephone</b>	Main +27 87 087 3188
<b>Email</b>	<a href="mailto:iadams@capenature.co.za">iadams@capenature.co.za</a>
<b>Reference</b>	<b>SSD14/2/6/1/4/E_Road_MyCiti IRT_Govan Mbheki – Manenberg_Edith Stephens NR</b>
<b>Date</b>	04 October 2021

Chand Environmental Consultants  
PO Box 238  
Plumstead  
7801

Via email: [marielle@chand.co.za](mailto:marielle@chand.co.za) / [info@chand.co.za](mailto:info@chand.co.za) / [claudette@chand.co.za](mailto:claudette@chand.co.za) / [sadia@chand.co.za](mailto:sadia@chand.co.za)

Attention: Ms Marielle Penwarden

Dear Ms Penwarden

**RE: POST APPLICATION DBAR - PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION EI, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130m EAST OF LINK ROAD, MANENBERG & GUGULETHU**

DEA&DP Ref: 16/3/3/1/A2/19/3040/21

Consultant Ref: 03040

CapeNature would like to thank you for the opportunity to comment on this application. Our comments are as follows.

1. It is understood that the preferred alternative (alternative 3), will avoid all wetland areas and run adjacent to these wetlands except at the section adjacent to Edith Stephens Nature Reserve (ESNR). Wetlands will be encroached within the road servitude adjacent to ESNR, but the development will not breach the boundary of ESNR. It is further understood, as per the botanical assessment, that the indigenous vegetation to be impacted is mostly highly degraded and transformed with only sporadic patches of highly degraded taxa of Cape Flats Sand Fynbos and Cape Flats Dune Strandveld occurring.
2. The encroachment on the wetland vegetation adjacent to ESNR and removing the current buffer zone provided by the road reserve will have edge effects on ESNR wetland function, which will affect the threatened taxa on the periphery of ESNR, as mentioned in the FGM minutes provided. A wetland offset for the portion of wetland buffer to be destroyed should be provided, which could possibly be used to increase ecological resilience along the affected edge of ESNR. This would require input from a botanical specialist and wetland rehabilitation specialist. We agree with the insertion of a dyke at the boundary of ESNR to hydrologically separate ESNR from the development and supplement the effect of the stormwater management design that will move stormwater away from ESNR.
3. If entire degraded patches of Cape Flats Sand Fynbos and Cape Flats Dune Strandveld will be cleared, then a biodiversity offset would be appropriate considering the conservation status of the vegetation types. An offset would not be appropriate in areas that are mostly transformed with only sporadic remnant indigenous vegetation. If entire patches of degraded

Cape Flats Sand Fynbos and Cape Flats Dune Strandveld will be cleared, considering the small area to be cleared and degraded nature, financial offsets could be appropriate in this case.

4. Confirmation is required on whether *Isoetes capensis* will be directly impacted by this development. If it will be impacted, it must be avoided as it is endangered. Search and rescue is not favourable as there is uncertainty as to its success. If translocation is the only option, then this must be considered in consultation with CapeNature.
5. The botanical assessment indicates that the survey was not conducted during the spring season and indicates that SCC may not therefore have been detected if present. A follow-up botanical survey should be conducted in the correct season to determine whether any SCC will be impacted.
6. Provide confirmation from the botanical and freshwater specialists on whether their findings currently remain the same, as it is noted that these assessments were conducted a few years ago. If their findings will change, then the impact assessments should be amended.

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

Yours sincerely,



Ismat Adams  
Land-Use Scientist: Landscape West

For:

Marius Wheeler  
Conservation Intelligence Manager: Landscape West  
([mwheeler@capenature.co.za](mailto:mwheeler@capenature.co.za))