



FORESTRY WESTERN CAPE: Private Bag X 12, Knysna 6570

Reference: EIA-WC-GR-0001-2024-25

Enquiries: M Koen/ Tel: (044) 302 6900/ Fax: (044) 382 5461/ E-mail: [MKoen@dfre.gov.za](mailto:MKoen@dfre.gov.za)

## Cape Eaprac

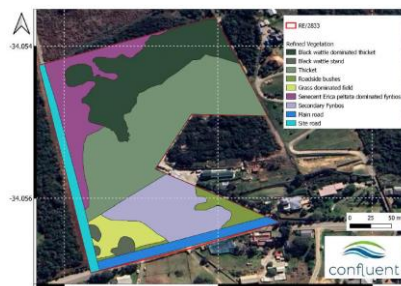
Attention: Mariska Nicholson

Email: [mariska@cape-eaprac.co.za](mailto:mariska@cape-eaprac.co.za)

Tel/Fax: 044 874 0365

### COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (BAR) FOR RESIDENTIAL DEVELOPMENT ON REMAINDER OF ERF 2833, GREAT BRAK RIVER, MOSSEL BAY:

- 1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA).
- 2 Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a licence. Under Section 7 of the NFA the whole forest ecosystem is protected and not just the indigenous/ protected trees within the forest. "Forest" is defined in the NFA to include i.a. "a natural forest... and the ecosystems which it makes up", thereby including all components of the forest, not only the trees." Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment.
- 3 According to the report: "The Site Sensitivity Verification indicate that the property consists of : Senecent Erica peltata dominated fynbos (Medium Sensitivity). Poor condition with serious rooikrans invasion. SCC found in this area (Hermannia lavandulifolia – Vulnerable). This SCC is not common, and entirely absent in the valley, thicket, secondary fynbos and grass dominated field. Disturbed Secondary Fynbos (Medium Sensitivity). Dominated by graminoid. Somewhat invaded (mainly black wattles). Introduced and Invasive Alien Plants. Black wattle dominated thicket (Medium Sensitivity). Black wattle trees (Low sensitivity). Limited potential to support SCC. Thicket (High Sensitivity). Cheesewood trees in thicket. Although not observed on site, there is a high probability that Milkwood trees are also occurring on site. Although not observed on site, the habitat has the potential to support SCC. Grass dominated field & Roadside bush (Low Sensitivity) Contained a lot of invasive kikuyu grass. The roadside bushes do not represent natural thicket vegetation. Limited potential to support SCC."



- 4 According to the report: "It is the intention of the Applicant to subdivide and rezone the property to accommodate for the following development components: The mitigated SDP entails the following: •12 x Single Residential Zone I erven on  $\pm 0.32$ ha, Each erf will be approximately 266m<sup>2</sup> in size; 31 x General Residential Zone I erven on  $\pm 0.83$ ha; Each erf will be approximately 268m<sup>2</sup> in size. This portion will be used for group housing and will have a density of approximately 17 units per hectare. 2 x Transport Zone III erven (Private Road) on  $\pm 0.95$ ha, 8 – 10m in width. 1 x Transport Zone II erf (Public Road) on  $\pm 0.35$ ha. 1 x Utility Zone on  $\pm 0.03$ ha (Conservancy Tank). The tank will have sufficient capacity to only need to be cleaned once every 7 days. The Conservancy Tank will be 5m x 5m x 3m in size. 3 x Open Space II erven on  $\pm 3.56$ ha. Natural vegetation will be retained, and invasive species removed."



- 5 Forestry conclude/ request the following:
  - a. Forestry request that should Coastal Forest, protected Milkwood trees, as well as Protected Cheesewood trees occur on the developmental portion of property it should be GPS'd and incorporated within the proposed development design as no-go areas
  - b. Forestry request a detailed vegetation report on the impacts in order to make informed comment on the proposals- and also to conduct a site inspection to verify the species being affected by the various proposals. As Forestry will determine by itself the conservation status of the vegetation being affected by the various proposals.
  - c. Kindly note that this letter is not a NFA licence. Continuing above activity without a valid NFA licence is illegal and a criminal offence under the NFA.
- 6 Forestry reserves the right to revise initial comment based on any additional information that may be received.

Yours Faithfully

pp. AREA MANAGER FORESTRY: WESTERN CAPE