



agriculture, forestry & fisheries

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Ms. S.Modise

Forestry Regulation & Support 13 April 2012

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Pietermaritzburg

3200

Dear Sir/Madam

COMMENTS FOR THE PROPOSED NCWABENI: OFF – CHANNEL STORAGE DAM (DRAFT SCOPING REPORT) NEAS REF NO: DEA/EIA/0000586/2011; DEA REF NO: 12/12/20/2468

The Department Water Affairs put forth a proposal to construct off – channel storage dam in order to provide short term water storage for the operation of the regional water supply scheme. Project is proposed within Ncwabeni River (D2 & D2A) or Gugamela River (D3 & D3A) and based on observation; both sites have environmental concerns due to the following reasons:

1. The proposed dam construction will have many implications on the ecosystem, making it less supportive of the wildlife and extinction of some tree species.
2. Though there is a wide existing gravel road and the footpath towards the eastern part of D2, the activity necessitates building of other roads to accommodate various machineries to utilize during the process. These will directly reduce the forest cover and lead to fragmentation of the landscape.
3. The first site (D2) is a sensitive area hence the species richness and no vegetation specialist report have on the scoping report. It is thus crucial to consider the type of vegetation occurring there and estimate the extent to which the damage is expected. However, the site is a no go area based on the information outlined above.
4. The vegetation described on the report (pg84), including pictures attached is based on the findings from Gugamela River (D3 & D3A) where the ecosystem has changed

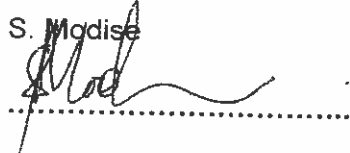
due to anthropogenic activities as it is a post settlement site, as opposed to Ncwabeni river.

5. Additionally, the information referenced (D2 & D2A) is for 1996 and might be biased hence the area is showing dense mosaic.
6. The latter proposed site (D3 & D3A) is disturbed and thus constitutes less vegetation in terms of trees/forest cover. Therefore, it is recommended for the construction of the dam. However, consultation should be made with affected parties.

This letter does not exempt you from considering other environmental legislations. Should any further information be required, please do not hesitate to contact this office.

Yours faithfully

S. Modise



Forestry Regulation & Support

KZN