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WETLAND MAINTENANCE MANAGEMENT PLAN, ERF 776, MANDALAY

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REPORT INFORMATION

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Olivia Venter holds a BSc degree in Conservation Ecology from the University of Stellenbosch. During the course of her studies, internships and professional career she has gained valuable and informed insight into the functioning of natural and socio-ecological systems, including aquatic ecology, together with many key research and monitoring skills. Olivia has specialist experience in the field of aquatic ecology with specific reference to impact assessment in the agricultural, residential development, renewable energy, resort development and biodiversity conservation sectors.

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Paul graduated from Potchefstroom University in 1995 with an Honours degree (B Art et Scien). He is an experienced environmental assessment practitioner with expertise in environmental management, heritage conservation, land-use planning, and sustainable development. His work spans both rural and urban conservation, focusing on environmental impact management, heritage preservation, recreation planning, and creating economic and employment opportunities. Paul is a registered Environmental Assessment Practitioner (EAPSA), a member of the International Association for Impact Assessment (IAIA) and accredited by the Association of Professional Heritage Practitioners – Western Cape (APHP).

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1. BACKGROUND AND INTRODUCTION

1.1. Contextual Information

In October 2011, Communicare (Pty) Ltd, the then owner of the original Erf 776, Mandalay (Figure 4), obtained Environmental Authorisation (EA) from the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) for the development of a residential housing project on the property as per Figure 2. Condition 8 of the EA required the preparation and implementation of a Maintenance Management Plan (MMP) for the two wetlands that were to remain on site, namely Wetland 3 and Wetland 7, prior to the commencement of construction activities. However, the required MMP was not prepared at the time.

This MMP has therefore been compiled to fulfil the requirements of Condition 8 of the EA and to provide a framework for the long-term management, maintenance and monitoring of the wetland areas falling within its scope. The MMP seeks to maintain and, where feasible, improve the ecological condition of these areas, while mitigating potential future impacts, and preventing degradation of wetland function and integrity. Through the implementation of appropriate management, monitoring and maintenance measures, the plan aims to preserve and enhance the ecosystem services provided by the wetlands within its scope and ensure that future impacts associated with the surrounding urban environment are effectively mitigated.

Figure 1: Locality Map - Original extent of Erf 776, Mandalay

Figure 2: Layout plan for the development of Erf 776 Mandalay

1.2. Legislative Framework

This MMP has been prepared in fulfilment of Condition 8 of the Environmental Authorisation issued by the DEA&DP in October 2011 for the development of Erf 776, Mandalay. The following is a list of the legislation that may be pertinent to the project and its long-term operational management. All activities on site must ensure compliance with the provisions of the legislation as applicable:

- The Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996);
- The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA);
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA);
- National Environmental Management: Biodiversity Act, 2014 (Alien and Invasive Species Regulations, 2014);
- The National Water Act, 1998 (Act No. 36 of 1998) (NWA); and

The areas subject to this MMP are located within an urban environment where periodic maintenance may be required to maintain ecological functioning. Such activities may include the removal of excess sediment, litter, illegally dumped material, and invasive vegetation. Accordingly, this MMP is also applicable to Listing Notice 1, Activity 19 (GN R.327) in terms of the NEMA EIA Regulations, 2014 (as amended) and seeks to provide a framework for the ongoing implementation of such maintenance activities.

The MMP must form part of all contractual documents for maintenance projects in the future. The adoption of the MMP by DEA&DP will require that the applicant/ landowner and all appointed contractors must comply with the requirements therein. Any amendments/ changes/ upgrades to the MMP required will require submission to and approval by DEA&DP.

1.3. Areas subject to the MMP

The original Environmental Authorisation provided for the retention of Wetland 3 and portions of Wetland 7 as open space areas, together with associated 30 m buffer areas. However, during implementation of the approved development, Wetland 7 was piped beyond the extent reflected in the approved layout and portions of the buffer associated with Wetland 3 were subsequently developed as part of the surrounding residential infrastructure.

A freshwater offset was implemented to compensate for the loss of wetland functionality associated with the modification of Wetland 7. Given the established urban context, the existence of approved offset measures, and the practical constraints associated with restoring the affected portions of Wetland 7, this MMP focuses on the long-term management of the remaining wetland features and associated offset areas.

Accordingly, the areas subject to this MMP comprise:

- Wetland 3;
- The remaining undeveloped portions of the associated 30 m buffer area surrounding Wetland 3; and
- The designated wetland offset areas established to compensate for impacts to Wetland 7.

These areas are illustrated in Figure 3 and collectively form the management area to which the objectives, management measures and maintenance activities contained in this MMP apply.

Figure 3: Areas subject to the Maintenance Management Plan, including Wetland 3, its associated buffer area, and the designated wetland offset areas associated with Wetland 7

1.4. Roles and Responsibilities

The landowner or its appointed representative is responsible for the implementation and ongoing management of this Maintenance Management Plan. This includes:

- Ensuring that all management and maintenance activities are undertaken in accordance with the requirements of this MMP.
- Undertaking periodic inspections of Wetland 3, the associated buffer areas, and the designated wetland offset areas associated with Wetland 7.
- Identifying and addressing issues that may adversely affect the ecological functioning of these areas, including erosion, litter accumulation, illegal dumping, stormwater-related impacts, and unauthorised encroachment.
- Coordinating the removal of litter, debris, excess sediment, invasive alien vegetation, and other materials where required to maintain ecological functioning.
- Monitoring and controlling alien invasive species using appropriate methods.
- Implementing rehabilitation and remedial measures where degradation or impacts are identified.
- Maintaining records of inspections, maintenance activities, incidents, and corrective actions undertaken in terms of this MMP. Where necessary, the landowner may appoint suitably qualified personnel or

contractors to carry out specific tasks under this plan, ensuring all work aligns with environmental management requirements and approved timings.

The competent authority may review compliance with this MMP through inspections, audits, reporting requirements, or other compliance monitoring mechanisms. Any amendments to the approved MMP shall be subject to approval by the competent authority.

2. BASELINE WETLAND ENVIRONMENT

PLEASE NOTE: The information provided in the following section is primarily obtained from the Freshwater Ecological Assessment (Belcher, July 2008) undertaken in 2008 as part of the original NEMA application. The full assessment is provided in Appendix A of this report.

The original Erf 776, Mandalay is situated within the catchment of the Kuils River. At the time of the 2008 Freshwater Ecological Assessment, the surrounding area was already largely developed for industrial, commercial and residential land uses. Since then, development within the broader area has intensified, with the dominant land uses remaining largely unchanged. The majority of the original Erf 776 has subsequently been developed as a residential estate.

The site falls within a vegetation type classified as coastal vegetation, which has been extensively transformed and was at the time of the initial Freshwater Ecological Assessment considered endangered. The broader landscape was characterised by low-lying topography underlain by deep alluvial and marine alkaline sands of the Witzand Formation. Historically, numerous channels and drainage features associated with the Kuils River occurred across the area, resulting in both natural and artificial wetlands being a common feature of the catchment.

The 2008 Freshwater Ecological Assessment identified six seasonal, groundwater-fed wetlands within Erf 776, Mandalay (Figure 4). These wetlands were considered to have formed naturally in response to the site's topography and hydrological conditions and were characterised by vegetation including common reed (*Phragmites australis*), restios, sedges and brakkoraal (*Sarcocornia natalensis*). In addition, a seventh wetland/watercourse feature was identified that had developed in association with a stormwater canal traversing the site from the northern boundary near Mandalay Station to the south-eastern corner of the property. This feature was largely dominated by bulrush (*Typha capensis*). Wetland 1 – Wetland 6 were classified as depression wetlands while Wetland 7 was classified as an artificial channelled valley bottom wetland.

At the time of the assessment, the wetlands were considered to be in a largely natural to moderately modified condition. The primary impacts identified included grazing, localised invasion by alien vegetation, and impacts of the surrounding development on the water supply and quality that feeds the wetland areas.

Due to their relatively small size and somewhat degraded condition, the wetlands were considered to provide limited ecosystem goods and services. Wetland 7, which had developed in association with the site's stormwater management system, was considered to provide the greatest functional value through its role in stormwater

attenuation and conveyance. Of the wetlands present on the site, Wetland 3 was identified as having the greatest ecological significance due to the presence of *Sarcocornia natalensis* and its association with a threatened wetland habitat type.

The areas subject to this MMP are Wetland 3 and its buffer, and the wetland offset areas established to compensate for impacts to Wetland 7 (Figure 3).

Figure 4: Mapped Wetland Features on Erf 776, Mandalay (Belcher, 2010)

3. MAINTENANCE AND MANAGEMENT FRAMEWORK

3.1. Goals and Objectives

The overarching goal of this MMP is to ensure the long-term protection and maintenance of Wetland 3, its associated buffer area, and the designated wetland offset areas associated with Wetland 7.

The specific objectives of the MMP are to:

- Prevent further encroachment, degradation and disturbance of the managed areas.
- Remove and manage invasive alien vegetation.
- Remove litter, illegally dumped material and other waste that may adversely affect wetland functioning.
- Identify and address erosion, sedimentation and stormwater-related impacts where required.

- Promote the maintenance and enhancement of indigenous wetland vegetation.
- Ensure compliance with the requirements of the Environmental Authorisation and relevant environmental legislation.

This MMP is a continuous strategy designed to ensure the wetlands remain in optimal condition.

3.2. Demarcation of Management Areas

The areas subject to this MMP must be clearly demarcated to define the extent of the areas to be maintained and to prevent further encroachment, disturbance and degradation:

- Wetland 3 and its associated 30 m buffer area must be clearly demarcated by means of fencing. Access to the wetland area must be limited to designated access points. In accordance with the Environmental Authorisation, a boardwalk may be established within the buffer area around Wetland 3 to facilitate controlled pedestrian access while minimising trampling and disturbance of wetland vegetation and soils.
- The designated wetland offset area associated with Wetland 7 must be clearly demarcated by means of a formalised gravel pathway maintained around the perimeter of the offset area. The pathway will define the extent of the management area, facilitate maintenance access, discourage uncontrolled pedestrian movement and trampling, and assist in limiting the encroachment of invasive vegetation into the wetland habitat.

3.3. Method Statements

The following method statements provide activity-specific requirements for implementing maintenance and management activities within the areas subject to this MMP:

1) Remove debris, litter, waste and illegally dumped materials
2) Manage alien invasive vegetation.
3) Maintain and repair of infrastructure, including boardwalks, pathways, gabions and fencing within the management area.
4) Erosion control and indigenous vegetation management

Method Statement 1 – Remove debris, litter, waste and illegally dumped materials					
Affected Area	**Objective**	**Method**	**Frequency**	**Phasing**	**Notes & Mitigation**
Whole area subject to MMP.	Remove litter, illegally dumped material and other waste that may adversely affect wetland functioning.	- Identify wetland / buffer areas that require maintenance in terms of litter/debris removal. - Access the area only through designated and demarcated entry points. - All rubbish and building rubble dumped in the wetland area must be removed such that the substrate within the wetland consists of only natural soils. - Removed material must be appropriately disposed of at a designated waste facility. - Rehabilitate disturbed areas once works are complete.	Start-up Activity	Pre-construction	Undertake removal manually as far as feasibly possible. If vehicles or machinery are necessary, ensure they are in optimal working condition and free from leaks to prevent any spillage of hydrocarbons or other contaminants.
Whole area subject to MMP.	Maintain free from litter and waste materials	- Solid waste inspections and manual clean-ups must be conducted quarterly. - Collected waste materials must be appropriately disposed of at a suitable waste facility. - Rehabilitate disturbed areas once works are complete.	Quarterly	Ongoing for the duration of the MMP	
Inlet and Outlet	Maintenance of flow	- Litter, excess plant material and sediment build up must be removed from the inlets and outlet of the wetland system where relevant.	Quarterly	Ongoing for the duration of the MMP	If needed, vegetation and sediment removal should take place manually in late

	through the system	- Remove sediment only when accumulation impedes flow capacity or poses a downstream risk. - Conduct sediment removal during dry periods to minimise turbidity.			summer, prior to winter rainfall.

Method Statement 2 – Manage alien invasive vegetation					
Affected Area	Objective	Method	Frequency	Phasing	Notes & Mitigation
Whole area subject to MMP.	Removal and continued control of alien and invasive plants	The wetland area designated for rehabilitation must be maintained free from alien invasive plants. Maintenance staff must be trained in the identification of basic weeds and alien invasive species. Alien invasive vegetation within the subject areas must be cleared according to approved, species-specific methods. These methods must be consistent with best practices such as those outlined in Martens et al. (2021). A Practical Guide to Managing Invasive Alien Plants: A Concise Handbook for Land Users in the Cape Floral Region (WWF South Africa, Cape Town). Ongoing follow-up clearing must be undertaken annually to prevent re-establishment and ensure the long-term effectiveness of control measures.	At start-up and thereafter annual ongoing monitoring and clearing of alien and invasive plants should be undertaken.	Ongoing for the duration of the MMP	Use of herbicides must be strictly controlled and may only take place during the dry season, when no rain is predicted and the water table in the wetland is low. Herbicide use during the operational phase must remain limited to stump treatment for resprouting species.

		Removal methods may include cutting and clearing existing mature trees, hand pulling or tree popping seedlings and manual weeding of herbaceous species. The removed material must be disposed of offsite. Some alien invasive species resprout once felled. To prevent this, an herbicide treatment suitable for use in watercourse must be applied post-felling. Cutting of these species may therefore only take place during the dry season. Follow-up alien invasive vegetation clearing must be undertaken annually. Areas of the system that are currently unvegetated, sparsely vegetated, or cleared of alien invasive plants during maintenance must be revegetated with locally indigenous obligate and facultative hydrophytes within the stormwater pond to minimize erosion and improve the system's ecological condition As far as feasible possible all alien clearing must be undertaken manually. Should machinery or equipment be required it must be kept in optimal working condition and free from any leaks to prevent any spillage of hydrocarbons or other contaminants.			All machinery must be kept in optimal working condition and free from any leaks to prevent any spillage of hydrocarbons or other contaminants. Machinery should only be allowed within the wetland area while actively carrying out rehabilitation tasks

Method Statement 3 – Maintain and repair infrastructure, including boardwalks, pathways, gabions and fencing within the management area.					
Affected Area	Objective	Method	Frequency	Phasing	Notes & Mitigation
Whole area subject to MMP	Prevent further encroachment, degradation and disturbance of the managed areas.	Maintenance of fencing, pathways, boardwalks and other approved infrastructure associated with the wetland management areas must be undertaken to ensure that the boundaries of the managed areas remain clearly demarcated and that access is controlled. Maintenance activities may include the repair or replacement of damaged sections, securing loose components, treatment of corroded or degraded areas, and other minor repair works. Where necessary, vegetation, litter and debris may be removed to prevent damage to infrastructure, maintain access, and ensure the effective functioning of stormwater and drainage features. General methods for maintenance and repair of infrastructure: Identify maintenance activities required. Access maintenance area only through designated and demarcated entry points.	Annual monitoring with ongoing actions as needed	Ongoing for the duration of the MMP	Conduct routine annual maintenance to minimize the risk of infrastructure failures that could necessitate more extensive work within regulated areas. Quarterly inspections of culverts and drainage structures should be undertaken (specifically prior to the onset of the winter rains and after large storm events) to ensure unobstructed flow and monitor the occurrence of erosion or damage. If erosion or damage has occurred, it must immediately be repaired or rehabilitated and revegetation, where applicable. The use of foreign materials—such as concrete, rubble, woody debris, or dry land-based soil— should not be used for maintenance activities, except where required for the repair of

		Clear area of debris, sediment or vegetation if required. Carry out necessary maintenance work and remove old debris or materials. Rehabilitate disturbed areas, remediate any erosion and suitably loosen any compacted soil. Reshape areas and/or replant as required.			existing infrastructure. In such cases, the use of these materials must be limited to the extent necessary and accompanied by appropriate mitigation measures to prevent environmental degradation.

Method Statement 4 – Erosion control and indigenous vegetation management					
Affected Area	**Objective**	**Method**	**Frequency**	**Phasing**	**Notes & Mitigation**
Whole area subject to MMP.	Identify and address erosion, sedimentation, stormwater-related impacts.	Conduct regular inspections for signs of erosion, sediment accumulation, stormwater scour, exposed soils and vegetation loss. Remove sediment deposits where these obstruct drainage pathways, affect hydrological connectivity or contribute to further degradation. Repair minor erosion features through reshaping, stabilisation and revegetation with locally indigenous species.	Inspections: annually & after high rainfall events Interventions as required.	Ongoing for the duration of the MMP	Limit disturbance to the minimum area required to undertake required works. Retain existing indigenous vegetation wherever possible. Only locally indigenous species appropriate to the wetland habitat may be used for revegetation.

		Maintain erosion control measures where required (e.g. gabion repairs). Rehabilitate disturbed or bare areas through the planting or seeding of suitable locally indigenous species. Remove dead or failed plant material and undertake supplementary planting where required (indigenous vegetation) Monitor rehabilitated areas and implement corrective measures where vegetation establishment is unsuccessful.			Any disturbed areas must be stabilised and revegetated with indigenous vegetation immediately following maintenance activities.

3.4. General Mitigation Measures

The following measures provide general guidance to minimise the spatial impact of the maintenance activities and are applicable to all method statements:

- Repairs and maintenance should be undertaken during low rainfall period (November to March) only, except for emergency maintenance works.
- Any disturbance to the managed areas caused as a result of the maintenance activities must be rehabilitated immediately.
- Where at all possible, existing access routes should be used. In cases where none exist, a route should be created through the most degraded area avoiding sensitive/indigenous vegetation areas.
- It must be ensured that all hazardous storage containers and storage areas comply with the relevant SABS standards to prevent leakage. All hazardous chemicals as well as stockpiles should be stored on bunded surfaces and have facilities constructed to control runoff from these areas.
- Appropriate sanitation facilities must be provided for all personnel for the duration of active onsite maintenance activities.
- No vehicles are permitted to enter the delineated watercourse without prior written authorization from a suitably qualified ECO.
- Wherever possible, maintenance work should be conducted on foot and carried out using hand tools rather than heavy machinery.
- When machinery is involved, ensure effective operation with no leaking parts and refuel outside of the riparian area, at a safe distance (minimum 32m) from the watercourse to manage any accidental spillages and pose no threat of pollution.
- In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practised near the surface area to prevent ingress of hydrocarbons into topsoil and subsequent habitat loss.
- All spills should they occur, should be immediately cleaned up and treated accordingly. All contaminated materials must be disposed of at a registered disposal facility.
- No new berms may be created.
- In circumstances which require the removal of any topsoil, this must be sufficiently restored through sustainable measures and practices.
- Concerted effort must be made to actively rehabilitate repaired or reshaped disturbed areas with indigenous local vegetation.
- The build-up of debris/sediment removed from a maintenance site may:

    - be utilised for the purpose of in-filling or other related maintenance actions related to managing erosion, which form part of an adopted MMP;
    - not be used to enlarge the height, width or any extent of existing berms;
    - not be deposited anywhere within the watercourse where such action is not part of the proposed maintenance activity (ies). Material that cannot be used for maintenance purposes must be removed to a suitable stockpile location (>32m from the edge of the delineated watercourse) before being disposed of at suitably registered facility.
- The use of foreign material, such as concrete, rubble, and woody debris, for maintenance actions is strictly prohibited, unless for the specific purpose of repairs to existing infrastructure, coupled with appropriate mitigation measures.
- Watercourses may only be accessed for the purpose of maintenance activities as assessed within this report. As far as possible, physical movement in the freshwater ecosystems by personnel must be limited. During maintenance works, trampling or clearing of vegetation should be avoided by using established paths where possible.
- Any AIPs within the maintenance area must ideally be removed prior to the initiation of soil disturbing maintenance activities.
- Where alien vegetation management is required, all clearing activities must follow approved, species-specific methods. These methods must be consistent with best practices such as those outlined in Martens et al. (2021). A Practical Guide to Managing Invasive Alien Plants: A Concise Handbook for Land Users in the Cape Floral Region (WWF South Africa, Cape Town). Detailed herbicides/biological control recommendations are also provided on the Working for Water website: http://www.dwaf.gov.za/wfw/. Herbicide use is not permitted during the winter season or within inundated areas; in these areas, only manual clearing methods may be employed.
- Any soil compacted during maintenance within the watercourse or adjacent terrestrial zones must be loosened and, where relevant, immediately revegetated with suitable indigenous species.
- Areas of the system that are currently unvegetated, sparsely vegetated, or cleared of alien invasive plants during maintenance must be revegetated with locally indigenous vegetation to minimize erosion and improve the system's ecological condition.

4. MONITORING AND REPORTING

4.1. Monitoring

The landowner, or its appointed representative, is responsible for overseeing the implementation and monitoring of this MMP. All management and maintenance activities undertaken within the areas subject to this MMP shall be implemented in accordance with the requirements of the plan. Regular monitoring is required to assess the condition of the managed areas, identify maintenance requirements, and ensure that the objectives of the MMP are being achieved.

The following minimum monitoring must be undertaken:

- Infrastructure Monitoring: Undertake annual inspections of fencing, boardwalks, pathways, gabions and other management infrastructure, and repair or maintain infrastructure where required.
- Alien Invasive Vegetation Monitoring: Undertake annual inspections to identify alien invasive vegetation and regrowth. Implement follow-up clearing where required and monitor the recovery of indigenous vegetation.
- Litter, Waste and Sediment Monitoring: Undertake quarterly inspections, and additional inspections following significant rainfall events, to identify and remove litter, illegally dumped material, debris, vegetation blockages and excess sediment.
- Erosion and Rehabilitation Monitoring: Undertake quarterly inspections, and additional inspections following significant rainfall events, to identify erosion, stormwater impacts, vegetation loss and other signs of degradation. Monitor the effectiveness of rehabilitation measures and implement corrective actions where required.

Any activities undertaken outside the scope of this MMP may require separate environmental authorisation and shall remain subject to the applicable provisions of environmental legislation.

4.2. Reporting

Form A below must be completed by the relevant person(s) before maintenance activities are undertaken and Form B below after a maintenance activity has been completed. Form A should be completed at least 7 working days before the commencement of any maintenance activity and Form B a minimum of 3 working days after the completion of the maintenance activity(ies). At least two photographs are required from two different points of perspective (A and B) looking at the site (coordinates of these points are required). The type and reference code relates to the relevant detail within the adopted MMP.

The landowner is responsible to ensure a record of all maintenance activities is recorded as per Form A & B. DEA&DP may, within a reasonable notice period, request to evaluate the maintenance activities and assess the maintenance sites as per the adopted MMP.

FORM A REPORTING FOR INTENT TO UNDERTAKE MAINTENANCE ACTIVITIES	
Section A: Landowner Details	
Landowner Name & Surname	
Farm/Erf No	
Today's Date	
Section B: Details of proposed maintenance activity	
WUA/GA reference number:	
DEA&DP MMP reference number:	
Activity Type:	
Reference code (*MMP Method Statement*):	
Footprint area (m^2):	
Volume of material (m^3):	
Equipment to be used:	
Description of method for planned activity:	
Date when work will commence:	
Date of last flood event for site:	
Note any further damage and comments regarding the state of the site:	
Section C: Photographs of activity location before maintenance	
Photo A – Before Maintenance Activities	
Coordinates:	
Photo B – After Maintenance Activities	
Coordinates:	

FORM B REPORTING FOR COMPLETION OF MAINTENANCE ACTIVITIES	
Section A: Landowner Details	
Landowner Name & Surname	
Farm/Erf No	
Today's Date	
Section B: Details of proposed maintenance activity	
WUA/GA reference number:	
DEA&DP MMP reference number:	
Activity Type:	
Reference code (*MMP Method Statement*):	
Footprint area (m^2):	
Volume of material (m^3):	
Equipment to be used:	
Description of method for completed activity and if commence date changed:	
Date activity completed:	
Date of last flood event for site:	
Note any challenges or difficulties experienced in following the MMP method statement	
Section C: Photographs of activity location after maintenance	
Photo A – Before Maintenance Activities	
Coordinates:	
Photo B – After Maintenance Activities	
Coordinates:	