



Agency for Cultural Resource Management
Specialists in Archaeological Studies and Heritage Resource Management

20 January, 2014

Att: Ms Kathryn Smuts
SAHRA
PO Box 4637
Cape Town, 8000

Dear Ms Smuts,

RECOMMENDED EXEMPTION FROM HAVING TO CONDUCT AN ARCHAEOLOGICAL SURVEY OF 67 WIND TURBINES, PROPOSED DE AAR 1 (MAANHAARBERG) WIND ENERGY FARM, DE AAR, NORTHERN CAPE PROVINCE (CaseID 2944)

ACRM undertook archaeological scoping for the proposed De Aar 1 (Maanhaarberg) Wind Energy Farm (WEF) near De Aar in the Northern Cape in April 2010¹. This entailed a fairly detailed foot and vehicle survey by the archaeologist of the Maanhaarberg on the farm Zwartkoppies, where up to 150 wind turbines are planned.

A relatively large number of dispersed, highly weathered, Middle Stone Age (MSA) tools were recorded during the study, but the survey encountered no significant archaeological heritage. The findings indicated that the proposed development of the Maanhaarberg WEF would not have an impact of great significance on these and potentially other archaeological remains.

The survey also targeted areas such as rocky kopjes and dolerite boulders which were searched for caves, rock paintings and engravings, but none were found.

In October 2010 a further study took place, focussing on the proposed access roads, powerline route, construction camp site and laydown areas, including an assessment of a further 13 wind tower sites on the Swaartkoppies, south of the Maanhaarberg². Very few MSA implements were documented, but several rock engravings were encountered during the study.

A total of 36 wind tower sites were therefore assessed; 23 on the Maanhaarberg and 13 on the Swaartkoppies, with the overall results indicating very low density scatters of archaeological heritage.

However, it should be noted that most of the Maanhaarberg was covered during the 2010 Scoping Study.

Recommendations made by ACRM at the time were subsequently endorsed by SAHRA³.

The proposed De Aar 1, Maanhaarberg WEF project has now been significantly scaled down to 67 wind turbines. The location sites for 54 of the turbines on the Maanhaarberg have been modified as a result of new wind measuring data.

¹ Kaplan, J. 2010. Archaeological Scoping Study for a proposed wind energy facility on the Maanhaarberge & Kombuisfonteinberge, De Aar. Report prepared for DJ Environmental Consultants. ACRM

² Kaplan, J. 2010. Archaeological Impact Assessment for a proposed photovoltaic power generation facility in De Aar in the Northern Cape Province. Report prepared for DJ Environmental Consultants. ACRM

³ SAHRA letter (Final Comment) dated 29 July 2013 (CaseID 2944).



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The proposed wind tower sites on the Swaartkoppies remain more or less unchanged.

It is brought to your attention that Condition 10.10.1 of the Environmental Authorization (EA) states that *"If there are any changes to the layout of the turbines, then additional survey work will be required in order to ensure that no sites are directly impacted and/or to identify the need for an excavation permit."* (EA attached for your attention).

Having read through my reports, and viewed the new location sites on Google Earth, it is my contention that the need to survey the 54 revised location sites for the wind turbines on the Maanhaarberge is not required. While it is likely that some archaeological heritage will be encountered, it is maintained that such occurrences are likely to comprise diffuse scatters of implements, of low (Grade 3C) archaeological significance.

ACRM, on behalf of the applicant (Longyuan Mulilo De Aar Wind Power Pty Ltd) is therefore requesting exemption from having to conduct a new survey of the proposed 67 wind tower sites.

Considering the large area already covered on foot and by vehicle by the archaeologist, it is maintained that the 2010 surveys have captured good information on the archaeological heritage present.

Yours sincerely

Jonathan Kaplan