



8 April 2016
478867

Department Environmental Affairs
6 Cnr Soutpansberg & Steve Biko Road
Arcadia
Pretoria
Tshwane
001

Attention: Mr Vincent Chauke
Cc: Mr Muhammad Essop

Dear Sir,

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: PROPOSED INYANDA – ROODEPLAAT WIND ENERGY FACILITY, FARM ROODEPLAAT, UITENHAGE, EASTERN CAPE: DEA REFERENCE NUMBER: 14/12/16/3/3/2/464

Enclosed please find two hard copies and two electronic copies of the Draft Environmental Impact Assessment Report (DEIR) for the proposed Inyanda – Roodeplaat Wind Energy Facility situated on the Groot Winterhoek Mountains west of the town of Uitenhage in the Eastern Cape. The DEIR will be made available for public comment for a period of 40 days beginning on 8 April 2016 and ending on 20 May 2016

The Department's letter dated 9 October 2015 accepting the Final Scoping Report (FSR) outlined several items to be addressed in the DEIR. For ease of reference please find these items listed in **bold** text below (numbered as per the Department's above-mentioned correspondence), along with our responses indicating how the item has been addressed in our report.

- I. **Ensure that all relevant listing notice activities applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. The application form needs to be amended to specify the relevant activities.**

Table 1-2 in the DEIR lists all the triggered activities and gives a project related description. The amended application form is included in Appendix A of the DEIR.

- II. **The following information is required:**

- a. **An amended application form with an indication of all the 2010 listed activities that are still listed**

Refer to Appendix A of the DEIR.

- b. **An indication of all the similarly listed 2014 activities An indication if there are any new 2014 activities that are listed**

Partners R Armstrong, AH Bracken, MJ Braune, JM Brown, CD Dalglish, BM Engelsman, R Gardiner, GC Howell, WC Joughin, DA Kilian, JA Lake, BF Liber, V Maharaj, DJ Mahlangu, RRW McNeill, HAC Meintjes, MJ Morris, GP Nel, VS Reddy, PE Schmidt, PJ Shepherd, MJ Sim, VM Simposya, HFJ Theart, KM Uderstadt, AT van Zyl, MD Wanless, ML Wertz, A Wood

Directors AJ Barrett, GC Howell, WC Joughin, V Maharaj, DJ Mahlangu, VS Reddy, PE Schmidt, PJ Shepherd

Associate Partners N Brien, LSE Coetser, CJ Ford, E Goossens, M Hinsch, SG Jones, W Jordaan, AH Kirsten, LH Kirsten, S Kisten, I Mahomed, RD O'Brien, T Shepherd, JJ Slabbert, WI Stewart, D Visser

Consultants JAC Cowan, *PrSciNat, BSc(Hons)*; JH de Beer, *PrSci Nat, MSc*; JR Dixon, *PrEng*; T Hart, *MA, TTHD*; GA Jones, *PrEng, PhD*; PR Labrum, *PrEng*; PN Rosewarne, *PrSciNat*; AA Smithen, *PrEng*; TR Stacey, *PrEng, DSc*; OKH Steffen, *PrEng, PhD*; PJ Terbrugge, *PrSciNat, MSc*; DJ Venter; *PrTech*

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A list of the relevant 2014 activities has been included in the amended application form as well as in Table 1-2 in the DEIR.

- c. An indication where in the report, all the 2014 activities have been assessed and mitigated for; and**

Table 1-2 in the DEIR references where these listed activities have been addressed in the report.

- d. A letter/affidavit from the EAP indicating that the above is true and correct. This must form part of the EIAR as well as a separate document for ease of reference**

The amended application form as well as the EAP declaration is included in Appendix A of the DEIR.

- III. With regards to infilling and excavation of watercourses for the construction of the Inyanda-Roodeplaat Wind Energy facility, this Department requires the applicant to provide an indication of the preferred and alternate locations from which the material used for infilling will be sourced and where excavated material will be stored and or disposed of. In addition, the impacts associated with this activity must be adequately assessed in the EIAR**

Refer to Section 2.2.3 of the DEIR for a description of the activities associated with infilling and excavation in watercourses. The impacts have been addressed through various specialist reports. Refer to Table 1-2 for reference to where in the report these impacts have been addressed.

- IV. GN R.546 Item 10: With regards to this activity, the EAP must adequately assess the impacts of this activity and the applicability of this activity thereof in the EIAR.**

The applicability of the activity and reference to where in the report these impacts have been addressed is provided in Table 1-2 of the DEIR.

- V. The Environmental Assessment Practitioner must provide a detailed motivation on the applicability of the Item 02 and 10 of GNR 546.**

The applicability of these activities is explained in Table 1-2 of the DEIR and described in Section 2.2.3.

- VI. The EAP must engage the relevant provincial authority with regards to development in geographic areas triggering GNR 546: Activities 2, 4,10, 12, 13, 14, 16 and 19**

Attempts were made to engage with DEDEAT on the FSR. Their response is included in the public participation section of the DEIR in Table 4-3.

- VII. It is requested that the EAP adequately address the comments from the Eastern Cape Parks and Tourism Agency into consideration**

Responses to the comments made by ECPTA can be found in the Public Participation of the report (Section 4) in Tables 4-1 - 4-3. A focus meeting was also held with ECPTA, minutes of which are included in Appendix E2.

- VIII. The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.**

An assessment of the impacts of the various listed activities has been covered through various specialist studies such as the hydrological and ecological studies. Reference is made in Table 1-2 to where these activities are addressed in the report.

- IX. Written comments must be obtained and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.**

Comments on the FSR are captured in Table 4-3 of the report and copies of the comments are included under Appendix E1. A graphical representation of the development relative to geographical areas is included under Appendix F.

- X. The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.**

A table as per the example given in DEA's acceptance of the FSR is included in Section 2.2 in Table 2-1 of the report.

- XI. The EIAR must provide the four corner's coordinates for the proposed development site (note that if the site has numerous bend points, each and every bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.**

Coordinates can be found in Appendix H of the DEIR.

- XII. The EIAR must provide the following: Clear indication of the envisioned area for the proposed Wind Energy Facility; i.e. placing of turbines and all associated infrastructure should be mapped at an appropriate scale. Clear description of all associated infrastructure. This description must include, but not limited to the following: Power lines; Internal roads infrastructure; and; All supporting on site infrastructure such as laydown area, guard house and control room etc.**

A map indicating placement of turbines and associated infrastructure is included in Appendix F. A description of the associated infrastructure is included in Section 2 of the DEIR. Section 2.3 describes the various powerline route alternatives under consideration.

- XIII. The EIAR must provide an indication of the location of the Wind Energy Facility in respect to the location of other energy facilities and its associated infrastructure.**

A locality map in relation to the nearest energy facility is provided in Appendix F.

- XIV. The EAP is advised to conduct a surface hydrological study as part of the EIAR.**

Dr Brian Colloty was appointed to conduct a hydrological assessment. The full specialist report is included in Appendix G of the Supplementary Volume of Specialist Studies, and impacts relating to hydrology are discussed in Section 5.9 of the DEIR.

- XV. The EIAR must provide detailed need and desirability as to why there is a need for the development and why the specific location is desirable.**

Motivation for the project is include in Section 2.1 of the DEIR.

- XVI. The Department of Water and Sanitation (DWS) must be consulted during the course of the process. Proof of consultation must be provided for in the EIAR.**

DWS have been notified of the process. Proof of consultation is included in Appendix E3 of the DEIR.

- XVII. The EIAR must provide an indication of the internal access roads and the impacts associated with them must be adequately assessed in the EIAR and EMPr.**

The impacts of the internal roads have been included in the specialist studies assessment.

- XVIII. The EIAR must provide an indication of the preferred powerline route alternative and provide an assessment and advantages and disadvantages of the alternative powerline route alternative**

An indication of the preferred route is included in Section 6.1.1 of the DEIR.

- XIX. The inclusion of all received comments and response thereto in the comments and response report.**

Refer to Tables 4-1 - 4-3 of the DEIR for comments and responses report. Original comments on the FSR are provided in Appendix E1.

- XX. Information on services required on the site, e.g. sewage, refuse removal, water and electricity. Who will supply these services and has an agreement and confirmation of capacity been obtained? Proof of these agreements must be provided.**

Services requirements have been discussed in Section 2.2.3. Information on water requirements for the construction phase has also been included in Appendix 12. Correspondence from Eskom can be found under Appendix E1 and I3 of the DEIR.

- XXI. The EIAR must provide a layout which depicts the entire facility, i.e. the wind and grid connection infrastructure.**
Refer to Appendix F for the layout of the development inclusive of powerline routes.
- XXII. The assessment of impacts and the Environmental Impact Assessment process; and, the requirements of the Public Participation Process (PPP) must be in accordance with Regulation 54 to 57 of the GN R543 of EIA Regulations 2010.**
Noted.
- XXIII. A copy of the final site layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible.**
Refer to Appendix F for the 52 turbine layout map.
- XXIV. An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.**
Refer to Appendix F for the sensitivity map.
- XXV. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.**
Refer to Appendix F for the sensitivity map.
- XXVI. A shapefile of the preferred development layout footprint must be submitted to this Department.**

The shapefile data has been included on the attached CD.

The additional items within the FSR acceptance letter are addressed as follows:

- The requested management plans associated with the EMPr as requested on page 5 of the FSR acceptance letter have been included under Appendix G and Section 7.7 of the DEIR;
- The avifauna and bat pre-construction monitoring reports have been included under Appendix D and E respectively of the Supplementary volume of Specialist Studies; and
- Cumulative impacts are addressed in Section 5.18 of the DEIR.

Yours faithfully,

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