

**ENVIRONMENTAL IMPACT ASSESSMENT: PROPOSED WIND AND SOLAR (PHOTOVOLTAIC) ENERGY FACILITIES NEAR SPRINGBOK,
NORTHERN CAPE
COMMENTS AND RESPONSE REPORT 3 (FINAL SCOPING PHASE)**

This Comments and Response Report (CRR) reflects the comments submitted in writing from **3 August 2012 until 24 August 2012** during the final scoping phase of the proposed project. In order to address the comments received, the CRR table has been divided into themed issues and the comments relevant to each issue have been included under the relevant (themed) section. A total of six comments were received and have been summarised and responded to below.

List of submissions:

No.	Name	Organisation	Date Received	Method
1	K. Smuts	South African Heritage Resources Agency	20/08/12	E-mail
2	Mr C Geldenhuys	Department of Environmental Affairs & Nature Conservation	06/07/12	Letter
3	NJ. Toerien	Northern Cape Department of Agriculture, land reform & rural development	11/09/12	Fax
4	Natasha Wilson	WWF Land Programme	13/07/12	E-mail
5	Shaun Cloete	Department of Agriculture	19/08/12	E-mail
6	S. Muobeleni	Department of Agriculture, Forestry and Fisheries	30/08/12	E-mail

LIST OF ACRONYMS

CRR	Comments and Responses Report
DEA	Department of Environmental Affairs (previously Department of Environmental Affairs and Tourism)
DEANC	Department of Environmental Affairs & Nature Conservation
FSR	Final Scoping Report
ECO	Environmental control officer
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
LEMPr	Life cycle Environmental Management Programme
I&APs	Interested and Affected Parties
NIMBY	Not in my Back Yard
SAHRA	South African Heritage Resources Agency
WEF	Wind Energy Facility
WWF	World Wildlife Fund

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ISSUES HAVE BEEN GROUPED UNDER THE FOLLOWING THEMES:

- A. HERITAGE RESOURCES**
- B. BIOPHYSICAL RESOURCES**
- C. WATER RESOURCES**
- D. AGRICULTURAL RESOURCES**

Comments and reponses:

No.	Name and Organisation	Date Received	Summary of Issue	Response
A. CULTURAL AND HERITAGE RESOURCES				
1				
1.1	K. Smuts	20/08/2012	<p>In light of the inconclusive findings regarding the origin of the larger crater, SAHRA requires that: A buffer should be observed around the crater and no construction should take place within that buffer zone. As the crater falls within the area demarcated for the WEF development, this buffer should be 50m from the perimeter of the crater. It is recommended that the buffer zone is demarcated by temporary fencing during construction. The no-go area should be marked on all construction maps and the ECO should be informed of the possible sensitivity of the site. SAHRA looks forward to receiving the outstanding heritage reports.</p> <p>Please ensure that the impact of the wind energy facility on possible cultural landscapes is considered in the assessment.</p>	<p>Noted. Layouts have been revised taking cognisance of various recommendations and sensitivity buffers have been applied to identified natural and socio-economic resources. Please refer to Figures 2.1 and 2.2 of the LEMPr illustrating the applied buffers.</p> <p>Noted. Refer to Annexure H and Annexure I for the Visual and Heritage impact reports respectively for the assessment on potential cultural landscape impacts.</p>
B. BIOPHYSICAL RESOURCES				
2				
2.1	Mr C Geldenhuys	06/07/2012	<p>The map of the proposed development shows the proximity of the facility to Goegap Nature Reserve and the adjacent property of Ratelkraal which is the property of the WWF. The possible expansion of the protected area network into Bushmanland (which has almost no protection status) is curtailed by this proposed development.</p>	<p>The site is approximately 18 km away from Goegap Nature Reserve and approximately 2.5 km away from Ratelkraal. It is noted that there is a large area of Bushmanland Arid Bushveld vegetation to the north of the site, which could be considered for expansion of the protected areas network (see Figure 4.6 in the EIR). Additionally, the proposed projects would not</p>

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cover the entire site hence it is possible that portions of the site could be considered for conservation. During land negotiations in 2011, landowners were specifically asked if they had been approached by WWF/DENC to discuss future expansion of the Goegap nature reserve and all of them indicated that this was not the case.

It should furthermore be noted that Mainstream Renewable Power South Africa (Pty) Ltd has been in contact with Ms Natasha Wilson of WWF, on more than one occasion, specifically with regards to WWF's expansion plans and the proposed projects. No objection has been received from WWF to date.

Please provide the shapefiles for the possible protected areas network expansion so that the potential impacts, if any, of the proposed projects can be assessed by the various specialists and included in the DEIR. Please also indicate the legal status of these possible expansion areas.

Other similar developments are proposed around the Springbok area with some developments directly adjacent to Goegap Nature Reserve. The renewable energy targets presume an even more concerted effort in the near future to expand the renewable energy network which will impact on biodiversity around and on current protected areas (e.g. birds and bats), other wilderness areas away from protected areas, sensitive habitats, water resources etc.

The cumulative impacts of the proposed projects considered in the DEIR. However, it should be noted that not all renewable energy projects proposed will be constructed as there are many requirements to be met.

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It is highly recommended that the locality of the Renewable Energy facilities be reconsidered and not placed within the Protected Area expansion.

See response to 1 above.

Mainstream undertook a fatal flaw analysis of four sites in the Northern and Western Cape, of which the current site was one. These sites were identified by considering various technical aspects, including surrounding land uses and existing services infrastructure as well as environmental aspects such as botany, avifauna, bats and more. Site visits and desktop studies were undertaken, and input was received from specialists in botany, avifauna, heritage and bats.

One of the sites considered in the fatal flaw analysis was located immediately adjacent to Goegap Nature Reserve and it was decided not to pursue this site in order to limit potential impacts on the reserve as well as the WWF site. Based on the Fatal Flaw Analysis, Mainstream decided to pursue two of the four sites, namely the Kangnas site and a site closer to Pofadder (currently the subject of a separate EIA process). Based on the selection process undertaken by Mainstream in selecting the site, no other site location alternatives are assessed in the EIA.

It is highly recommended that the Renewable Energy facilities are not placed within visible and/or ecological impact zones around the Protected Areas. This means not within a minimum buffer zone surrounding Protected Areas.

See response to 1 above. We are not aware of any legally applicable buffer zones around protected areas and would appreciate if these could be provided.

Various specialist studies have been undertaken for the proposed projects, including a visual, botanical, aquatic ecology, avifaunal

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It is recommended that climate change migration corridors be considered and not be impacted on by Renewable Energy facilities.

and bat studies. These studies have determined the potential visual and ecological impacts of the proposed projects on the surrounds. This information is included in Chapter 4 of the DEIR.

It is not certain if climate change migration corridors have been designated or if it is suggested that they are compiled. If they have been designated it is requested that these are please made available so that the potential impacts on these corridors can be considered. If this recommendation is a suggestion that corridors be compiled then it is suggested that a body such as DEA complete this task as this would need to be addressed at a strategic, not project specific, level.

It is recommended that a more strategic planning of placement of Renewable Energy facilities be implemented as the current ad hoc and random method is causing negative impacts on the Northern Cape's biodiversity, eco-tourism and planning processes.

As this comment is addressed to DEA no response is required.

			Procedures within our department require comments of our botanist on EIA applications and can only be delivered via our Environmental Division (EIA applications receiving and handling).	Noted. EIA documentation will be submitted to the Environmental Division (EIA applications receiving and handling).
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2.2	Natasha Wilson	13/07/12	WWF-SA has recently developed internal guidelines regarding renewable energy applications specifically, wind energy applications. These guidelines are still in a draft format, used within WWF to aid decision making when it comes to commenting on applications. The internal guidelines are specific to areas that fall inside of the protected area expansion strategy or adjacent to already protected areas.
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Noted.

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The approach we have taken is to avoid the NIMBY standpoint but to consider the applications as they are received on a case by case basis.

We also acknowledge that renewable energy has a role to play in the future of South Africa's energy needs.

C. WATER RESOURCES

3

3.1	Shaun Cloete	19/08/12	Commenting has been delayed due to technical difficulty and will be made shortly.	Noted.
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D. AGRICULTURAL RESOURCES

4

4.1	NJ. Toerien	11/09/2012	The developer must comply with Act 43 of 1983 and also take care of the following: Article 7.(3)b of Regulation 9238: CONSERVATION OF AGRICULTURE RESOURCES, 1983 (Act 43 of 1983). Utilisation and protection of vliets, marshes, water sponges and water courses 7.(1) " no land user shall utilize the vegetation in a vlei, marsh or water sponge or within the flood area of a water course or within 10 meters horizontally outside such flood area in a manner that causes or may cause the deterioration of or damage to the natural agriculture resources."	Noted. Layouts have been revised taking cognisance of specialist recommendations and sensitivity buffers have been applied to areas with identified Agricultural potential. Please refer to Annexure M for the Agricultural impact report and Figures 2.1 and 2.2 of the LEMPr for the revised layouts and associated sensitivity buffers.
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4.2	S. Muobeleni	30/08/2012	Can you please be specific on the footprint were the wind and solar is going to be erected. I need you to tell me that out of 46 535 (ha) how many hectares will be used.	Please refer to Table 3.2 and 3.4 of the DEIR for specific footprint requirements for both the wind and solar facilities.
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