

Appendix C, Annexure I – Comments & Response Sheet – SAPPI Ngodwana Dam Remediation – FBAR

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Name & Contact	Correspondence & Date	Comment	Response
<p>Nokukhanya Khumalo - nkhumalo@sahra.org.za - SAHRA</p>	<p>Loaded onto SAHRIS on 23/06/2020</p>	<p>In terms of the National Heritage Resources Act, no 25 of 1999 (NHRA), heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are generally protected. They may not be disturbed without a permit from the relevant heritage resources authority. In contexts of development applications, the developer must ensure that no heritage resources will be impacted by the proposed development, by lodging an application to SAHRA and submitting detailed development specifications as a notification of intent to develop. If the application is made in terms of s. 38 (8) of the NHRA then it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is undertaken, as s. 38(2)a does not apply. Such a study should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report, The SAHRA 2012 Minimum Standards: Palaeontological Component of Impact Assessment Report and section 38(3) of the NHRA.</p>	<p>A Phase 1 Archaeological and Heritage Impact Assessment was undertaken on 10 July 2020 and a Phase 1 Desktop Paleontological Impact Assessment on 01 June 2020.</p> <p>Both Reports were uploaded onto the SAHRIS system on 26 October 2020.</p>

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		<p>SAHRA as a commenting authority in this application requires an assessment of all heritage resources, including palaeontological resources to be conducted by suitably qualified archaeologist and palaeontologist respectively, within the EA application process. The development area is located on a moderate (green) palaeontology sensitive area according to the SAHRIS Palaeo-sensitivity Map, therefore a desktop study will be required along with protocol for finds. All required environmental documents must be submitted as well. If you are unaware of any archaeologists and palaeontologists a list of them working within the Heritage Resources Management field are provided in the following websites: (see www.asapa.co.za) and (see www.palaeosa.org). SAHRA will comment further on this proposed development once the requested reports are submitted to the case. This comment must be forwarded to the competent authority and proof of submission must be uploaded to the case.</p>	
<p>Carla Davis - CDavis@tracn4.co.za – TracN4</p>	<p>Email #1 on 30/06/2020</p>	<p>Hlengile</p> <p>Kindly register me as an interested and affected party.</p> <p>I note on the sketch that mention is made of using the N4 as haul road. It is not clear what the extent of the hauling will</p>	<p>Trac N4 was registered as an Interested and Affected Party on the same date.</p>

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		<p>be and the period intended to be used as haul. Truck types, number of loads. Do you have further information in this regard? The Kaapse hoop/N4 intersection is currently operating near capacity during peak periods. Additional construction trucks would aggravate the situation and could result in unsafe conditions.</p> <p>I will submit a signed response form as well to confirm our registration as I&AP.</p> <p>Regards</p> <p>Carla</p>	
	<p>Email #2 on 30/06/2020</p>	<p>Hlengile</p> <p>Herewith registration form.</p> <p>We need further information on the construction traffic, traffic management plan and Traffic Impact Statement/Assessment report to determine the effect of the construction traffic at the Kaapse hoop intersection and the other N4 intersecting point of the construction traffic. Duration of the construction? Types of trucks to be used and loads? Hoping to comment further once we have received additional information.</p>	<p>Response email on 02/07/2020:</p> <p>Good afternoon Carla,</p> <p>The Design Engineer has commenced with the appointment of Consulting Engineers to undertake a full Traffic Impact Study & Report. Once the draft report is complete, we will immediately forward it to you for comment and inputs. If you have any standards or requirements that you would like included in the scope of work or that the service provider must be cognisant of, we will happily include it.</p> <p>Kind regards</p>

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		<p>Regards Carla</p>	<p>A draft Traffic Study relating to the SAPPI Dam Remediation project, addressing ingress and egress onto the N4 was emailed to TRAC on 08/09/2020.</p>
	<p>Comments on Registration Sheet on 30/06/2020</p>	<p>Trac is responsible for managing of the TracN4 Toll Route. The BID document indicates the N4 to be used as a haul road for the dam. We will require further information on the intended use of the N4 for hauls. Types of vehicles, origin and destination. Load? Weighing to check permissible loads? Number of trucks? Traffic Impact Statement/Assessment on the effect of traffic flow on the intersections affected by the construction trucks. Traffic Management Plans?</p>	<p>Response email on 01/07/2020:</p> <p>Good morning Carla,</p> <p>Thank you for the registration form. Your queries have been escalated and I will revert to you as soon as possible.</p> <p>Regards, Hlengile</p> <p>Two Traffic Impact Studies were undertaken by DMV Consulting Engineers. The first report deals with potential impacts to the N4 entitled “SAPPI Ngodwana Dam rehabilitation: request for approval of a haul route along eland valley section 7x of N4, Report Ref: 20828 L02, dated: 11 August 2020” which was forwarded to TRAC for comment on the 8th of September 2020. The second report assesses the requisite road upgrades that will be required on the project property entitled “Preliminary assessment of haul roads for SAPPI, Ngodwana Dam rehabilitation, Report Ref. 20828 dated 8 September 2020”. The findings and recommendations of both these reports were included in the BAR & EMPr for</p>

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	<p>Email on 30/11/2020</p>	<p>Hlengiwe</p> <p>Thanks for the reminders regarding the due dates for comments. I have perused the traffic study. As indicated the expected additional traffic is low. We concur with the conclusions.</p> <p>Once an intended start date has been determined we can provide details of special high traffic days not allowed to transport the material for stockpiling. They should provide us at least 14 days' notice before activities will start. At this stage we recommend that no stockpiling of material is done on Fridays.</p> <p>Apart from the study they should also submit a traffic management plan confirming the following:</p> <ul style="list-style-type: none"> • Traffic accommodation signage, • Flagmen at N4 intersection during day when stockpiling is done, • Daily checking of vehicles to confirm that it is clean, road worthy, with operational amber construction lights, • Construction lights on trucks should be acceptable – not the small lights. Must be 	<p>implementation.</p> <p>A traffic management plan is going to be included in the contract documentation and will provide for, amongst other things, daily checking of vehicles to confirm that it is clean, road worthy, with operational amber construction lights which are visible from back and front of the vehicle by other vehicles behind or approaching. These conditions have also been included in the EMPr for implementation.</p>
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		<p>visible from back and front of the vehicle by other vehicles behind or approaching.</p> <p>Regards, Carla</p>	
<p>Zinzile Mtotywa - ZinzileM@daff.gov.za – DAFF</p>	<p>Email on 28/07/2020</p>	<p>An interest to participate in this development arises in terms of Listing Notice 3 (GG No. 40772, GN No. 324, 07 April 2017) / Listed Activity 12 referenced in page 3 of this BID. In terms of anticipated issues in pg6 of this document, DEFF – (Forestry) would like to make inputs as follows (Terrestrial Biodiversity Impact Assessment – Ecological Study Report) should such reports become available for public scrutiny.</p>	<p>A Terrestrial Biodiversity Impact Assessment was undertaken in July and September; the Ecological Study Report was disseminated to all I&APs including DEFF, with the Draft Basic Assessment Report on 30 October 2020.</p>
	<p>Email on 13/12/2020</p>	<p>Hi Ms. H Mtsweni,</p> <p>The terrestrial report of the proposed project seems not to have highlighted protected species in terms of NFA as even such reference in the report was limited or absent. I would though request that , should there be some of the listed trees species within the footprint of the project area and that project works trigger a removal, this office through the services of the ECO for the project must be made aware.</p>	<p>Response email on 14/12/2020</p> <p>Good morning Zinzile,</p> <p>Thank you for the comment below. MTPA had a similar request/recommendation and the EMPr has a mitigation/condition with the similar effect.</p> <p>Yours sincerely,</p> <p>During the initial construction of the dam in the early 1980's, all vegetation was cleared and the landscape transformed. This may contribute to the absence of protected fauna/flora and the dominance of alien invasive species. The EMPr additionally requires a search & rescue be undertaken by a Specialist prior to any vegetation clearance as an additional safe guard to ensure no fauna or flora of conservation concern are negatively impacted.</p>

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<p>Xolani Nkosi - nkosixe@mpg.gov.za - DARDLEA</p>	<p>Email on 30/11/2020</p>	<p>Please provide the co-ordinates of all the watercourse crossings.</p> <p>Please provide the total size of the proposed footbridge and also confirm whether the proposed footbridge will or will not rigger Activity 12 of LN 1.</p> <p>MTPA must be consulted and be provided with an opportunity to comment on the draft BAR. Proof of such consultation must be provided in the final report.</p> <p>The final BAR must provide proof that all potential and registered I&AP's, including Organs of State, were provided with access to and an opportunity to comment on the draft BAR following submission of the application form (Regulation 40 (3)).</p> <p>The final basic assessment report must include an issues and response report, as well as copies of and responses to comments received from all I&APs, including these comments.</p>	<p>The co-ordinates of the watercourse crossings are as follows:</p> <ul style="list-style-type: none"> • 25°34'53,75"S, 30°40'20,03"E (pedestrian footbridge) • 25°34'55.12"S, 30°40'17.38"E (low-water vehicle crossing) • 25°35'1.34"S, 30°40'18.29"E (seepage area) <p>The estimated size of the footbridge is 50m² as per Table 7 of the BAR. The footbridge straddles the dam discharge channel and in accordance with the Department's recommendation, Listed Activity 14 of LN3 has been included in an updated Application Form with the FBAR, and not Listed Activity 12 of LN1, as the area falls within the ESA: Protected Area 5km buffer.</p> <p>Please see Appendix C Annexure J for the comments from MTPA.</p> <p>Please see Appendix C Annexure K for the distribution of the DBAR to all potential and registered I&AP's</p> <p>Please see Appendix C Annexure I & J for the comments and response sheet and the copies of all comments received, respectively.</p>
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<p>Sihle Mthembu – sihle.mthembu@mbombela.gov.za – Mbombela Local Municipality</p>	<p>Email on 02/12/2020</p>	<p>Kindly receive our comments regarding the proposed Ngodwana dam remediation project within the City of Mbombela, Mpumalanga province. The City of Mbombela (Environmental Management and Planning) supports the proposed project and has the following comments.</p> <p>1. NEED AND DESIRABILITY OF THE PROJECT</p> <p>SAPPI Ngodwana intends to upgrade an existing dam. The dam remediation is to ensure the continued safe operation of this Category III dam including the stability of the main and right flank embankments and its foundations. The construction of a pedestrian bridge and a low water vehicle crossing over the Ngodwana River, to allow access during construction and dam safety inspections during operation.</p> <p>2. ECOLOGY AND SURFACE WATER</p> <p>These activities will take place within 32m of a watercourse, outside an urban area, and within a critical biodiversity area (CBA) and within 5km of a protected area.</p> <p>All the proposed activities should not alter with the Present Ecological Status (PES) of the receiving environment and downstream ecology in any way. Physical alterations of biodiversity should be minimal and be away</p>	<p>The comments are duly noted and will be incorporated into the FBAR and the EMPr (where implementation is required).</p> <p>The EMPr has a condition with the similar effect and cause. Water Uses (c) & (i) are in the process of being registered through a General Authorisation via the eWULAAAs.</p>
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		<p>from sensitive footprints. Prioritize the use of existing services (e.g. roads) and previously disturbed/degraded areas than opting to disturb new environments</p> <p>An integrated water use licence must be obtained authorized by the Department of Water & Sanitation (DWS) because it involves activities that are regulated by Section 21(c) and (i) of the National Water Act (1998);</p> <p>Section 21(c): impeding or diverting the flow of water in a watercourse Section 21(i): altering the bed, banks, course or characteristics of a watercourse.</p> <p>3. STORM WATER MANAGEMENT PLAN</p> <p>Due to the nature of the project scope and associated works, there is high possibility of the occurrence of soil erosion as there will be vegetation clearnace. Clearing of site establishment areas will create bare areas, channelling storm water and surface run-off, etc. This will cause erosion of sediments and result to the siltation of the river. A coherent storm water management plan should be in place.</p> <p>4. RECOMMENDATIONS</p> <p>The developer has to appoint an Environmental Control Officer (ECO) during construction phase in order to ensure that the</p>	<p>The FBAR & EMPr have made provision for effective stormwater management.</p> <p>The EMPr has made provision for the appointment of suitably qualified and experienced ECO, which will likely be a condition in the approved EA.</p>
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		<p>development adheres to the conditions prescribed in the authorizing document and also to ensure that all the mitigation strategies or measures stipulated in the Environmental Management Plan (EMP) are properly instituted. Mitigation measures have to be developed for all anticipated issues.</p> <p>Hope you find this to be in order.</p>	
<p>Thabile Mnisi - Thabile.Mnisi@mtpa.co.za - MTPA</p>	<p>Email on 02/12/2020</p>	<p>MTPA has no objection to the proposed development on the proposed site.</p> <p>The MTPA requests that in the event that any conservation important plants or bird nests be encountered during the construction phase that the ECO should inform the authorities accordingly.</p> <p>The ECO should ensure that no pollution takes place on the development site. All exotic trees should be removed within a radius of 500 meter of this development site.</p>	<p>The comments are duly noted and have been incorporated into the EMP (where implementation is required).</p>
<p>Simanga Nkosi - simanga.nkosi@drdlr.gov.za - DRDLR</p>	<p>Email on 10/12/2020</p>	<p>Department of Agriculture Land Reform and Rural Development (DALRRD) has no objection against the registration of water rights of the property and authorisations thereof in terms of environmental prescripts. However these comments do not rescind, replace or overrule any previous pronouncement made by DALRRD on the property. Such pronouncement shall take precedence over these comments.</p> <p>Based on the above deliberations, DALRRD would like to give advice that the proposed initiative aligns and abides to the prescripts, statutory bodies,</p>	<p>Response email on 11/12/2020</p> <p>Good morning Simanga,</p> <p>Thank you for the comments on the SAPPI Dam Remediation DBAR which are duly noted and will be incorporated into the Comments & Response Register in Final Basic Assessment Report.</p> <p>Yours sincerely,</p>

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		stakeholders and conditions as may be indicated by the controlling authority within which the applicant site and the activity is located.	
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