

Appendix C5:
Comments Received

DEFF



environment, forestry & fisheries

Department:
Environment, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House ·473 Steve Biko Road, Arcadia,· PRETORIA

DEA Reference: 14/12/16/3/3/1/2253

Enquiries: Ms Samkelisiwe Dlamini

Telephone: (012) 399 9379 E-mail: SDlamini@environment.gov.za

Ms Jo-Anne Thomas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2191

Telephone Number: 011 656 3237
Email Address: joanne@savannahsa.com

PER MAIL / E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GRID CONNECTION INFRASTRUCTURE, INCLUDING 132KV OVERHEAD POWERLINE, SWITCHING STATION AND ANCILLARIES, FOR THE GREAT KAROO WIND FARM, NORTHERN CAPE PROVINCE

The Draft Basic Assessment Report (BAR) dated November 2020 and received by this Department on 03 November 2020, refer.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Listed Activities

- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link:
<https://www.environment.gov.za/documents/forms>.
- It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

(b) Alternatives

- Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended.,

(c) Coordinates

- The BAR must include coordinates of the proposed switching station

(d) Public Participation Process

- i. The following information must be submitted with the final BAR:
 - a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
 - b) Copies of all comments received during the Draft BAR comment period; and
 - c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- i. Please ensure that all issues raised and comments received during the circulation of the Draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- ii. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(e) Environmental Management Programme

The EMPr must also include the following:

- (a) All the recommendations as proposed by the impact assessment specialist
- (b) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (c) Please be informed that the following content must be incorporated within the EMPr's as indicated in Appendix 4 of the EIA Regulations 2014, as amended:
 - (i) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.
 - (ii) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
 - (iii) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —
 - (a) Planning and design;
 - (b) Pre-construction activities;
 - (c) Construction activities;
 - (d) Rehabilitation of the environment after construction and where applicable post closure; and
 - (e) Where relevant, operation activities.
 - (iv) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —
 - (v) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
 - (vi) Comply with any prescribed environmental management standards or practices;
 - (vii) Comply with any applicable provisions of the Act regarding closure, where applicable; and
 - (viii) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.
 - (ix) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
 - (x) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.

- (xi) An indication of the persons who will be responsible for the implementation of the impact management actions.
- (xii) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
- (xiii) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (xiv) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

(f) General

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -*

(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environment, Forestry and Fisheries

Signed by: Dr Danie Smit

Designation: Control Environmental Officer: National Infrastructure Projects

Date: 02/12/2020

cc:	Richard Gordon	Great Karoo Wind Farm(Pty) Ltd	E-mail: Stephnie.kot@Aced.co.za
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DEFF
(Biodiversity Conservation Directorate)



environment, forestry & fisheries

Department: Environment, Forestry
and Fisheries
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: + 27 86 625 1042

Reference: Great Karoo WEF & Grid connection

Enquiries: Ms Mmatlala Rabothata/ Ms Tsholofelo Sekonko

Telephone: (012) 399 9174

E-mail: MRabothata@environment.gov.za/Tsekonko@environment.gov.za

Ms Nicolene Venter
Savannah environmental (Pty) Ltd
PO Box 148
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Telephone Number: +27 (11) 656 3237
Email Address: publicprocess@savannahsa.com

PER E-MAIL

Dear Ms. Venter

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR GRID CONNECTION INFRASTRUCTURE INCLUDING 132KV OVERHEAD POWER LINE, SWITCHING STATION AND ANCILLARIES FOR THE GREAT KAROO WIND FARM, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the report, the entire extent of the corridor is located within the Komsberg Renewable Energy Development Zone (REDZ) and within the central corridor of the Strategic Transmission Corridors. Furthermore, the proposed development overlaps within a Critical Biodiversity Area (CBA 1 and CBA 2) as well as a National Protected Areas Expansion Strategy (NPAES) focus area. Developments within these areas are not supported without proper mitigation measures.

However, the relatively low overall footprint of the proposed development is unlikely to significantly compromise the ecological functioning of the affected area and is regarded as a 'Low' risk. There are no impacts or risks identified to be of a high significance or considered as unacceptable with the proposed development. In addition, no impacts that will result in whole-scale change are expected to occur.

Notwithstanding the above, the following recommendations must be implemented in the final report:



Batho pele- putting people first

- An ecologist must be appointed to perform a final walkthrough prior to finalisation of the final phase of the EIA, to identify all sensitive plant species and assist in identifying the areas that require protection,
- The breeding site of a Verreaux's Eagle, Southern Black Korhaan and Ludwig's Bustard on site must be demarcated as a NO-GO Zone; and
- The Avifaunal specialist must determine the final pylon positions prior to construction and where bird flight diverters are required and the installation of power line pylons must be away from ecological sensitive systems
- A rehabilitation and alien vegetation control program within all sensitive areas must be developed,

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.

NB: Please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.

Yours faithfully



Mr. Seoka Lekota

**Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Environment, Forestry & Fisheries**

Date: 03/12/2020

SAHRA



an agency of the
Department of Arts and Culture

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Enquiries: Natasha Higgitt
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CaseID: 15700

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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
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Great Karoo Wind Farm (Pty) Ltd, proposes the development of specific grid connection infrastructure required to connect and evacuate the generated power of the authorised Great Karoo Wind Farm (DEA Ref No. 12/12/20/2370/3) to the national electricity grid. Following consultation with Eskom, it has been confirmed that the Great Karoo Wind Farm must connect to the Hidden Valley substation located at the ACED Renewables Hidden Valley (Karusa) Wind Farm, which is currently under construction, to the west of Great Karoo Wind Farm. The project is located ~44km south of Sutherland and ~50km north of Matjiesfontein within the Northern Cape Province and falls within the Namakwa District Municipality and the Karoo Hoogland Local Municipality. The grid connection infrastructure required includes a switching station (up to 100m x 100m which is 2ha) to be developed adjacent to the authorised Great Karoo Wind Farm on-site substation. A 132kV double- or single-circuit overhead powerline, with a length of up to 14km, will connect the proposed switching station to the Eskom Hidden Valley substation. The pylon structures of the power line will be up to 32m high and the power line will be developed within the servitude of up to 40m wide. A grid connection corridor of 300m has been identified for the power line, which widens to ~740m wide for the eastern section of the powerline to allow for consideration of alternatives. A 500m assessment area around the wind farm substation has been considered for the placement of the switching station. Collectively, these assessment areas are referred to as the “development envelope”. The proposed infrastructure will be appropriately placed within the development envelope, outside of identified environmental sensitive areas. Where possible, the switching station will be accessed via the authorised access road to the Great Karoo Wind Farm substation. However, where this is not feasible during construction a service track along the length of the power line servitude, of up to 4m wide, will be required to allow for large crane movement. This track will be rehabilitated following construction to a typical ‘jeep’ track (i.e. off-road track) for use during operation. Other associated infrastructure includes drainage line crossing infrastructure (culverts) and temporary laydown area/s that will be rehabilitated upon completion of the construction phase. Two power line alternatives are being considered for the project which are near the starting

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point of the power line at the proposed switching station. Both alternatives are assessed equally as part of the Basic Assessment process. The alternative that will be developed will depend on the final placement of turbines at the Great Karoo Wind Farm, since the powerline will need to be routed between the turbines (the final turbine positions will only be confirmed closer to the time of wind farm construction in which Eskom setback requirements will also need to be catered for). It is therefore requested that both alternatives be approved, on condition that only one of the alternatives will be developed. The grid connection infrastructure will be located within three affected properties: » Farm Kentucky No. 206; » Portion 1 of the Farm Orange Fontein No. 203; and » Remaining Extent of the Farm De Hoop No. 202.

Savannah Environmental (Pty) Ltd has been appointed by Great Karoo Wind Energy Facility (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed 132KV overhead power line, switching station and ancillaries for the Great Karoo Wind Farm, Northern Cape Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed infrastructure will include the construction of a 132KV powerline approximately 14 km in length, laydown areas, substation, and a batching plant.

CTS Heritage has been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2020. Heritage Screening Assessment for Basic Assessment Process for the Grid Connection infrastructure, including 132kV overhead powerline, switching station and ancillaries, for the Great Karoo Wind Farm, Northern Cape.

One possible burial is located in close proximity to the proposed powerline which is discussed in SAHRIS Case ID 15452

(
<https://sahris.sahra.org.za/cases/report-site-visit-and-assessment-stone-packed-feature-soetwater-wef-case-no-218>). It is noted that SAHRA indicated in 2016 that there will be no need for further palaeontological assessment for the Great Karoo WEF, in which the proposed powerline is to be located.

Recommendations provided in the report include the following:



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- The recommendations provided in SAHRIS Case ID 15452 for the possible burial are included in the report;
- A walk-down of the proposed OHL and switching station area is required prior to construction. This must be conducted by a qualified archaeologist to ensure that no heritage resources are to be impacted by the development. If heritage resources are identified at or near any proposed infrastructure, an assessment of the significance of the heritage resources and the impact to the identified heritage resource must be completed. A report detailing the results of the survey must be submitted to SAHRA before construction commences. This information can be included in the same report required for the WEF (SAHRIS Case ID 9373) and the BESS (SAHRIS Case ID TBD). This walkthrough does not affect the layout, but is rather intended to inform whether any additional mitigation measures (e.g. sampling) may be required before construction commences;
- If concentrations of archaeological heritage material and human remains are uncovered during construction, all work in proximity to the finds must cease immediately and be reported to the Albany Museum (046 622 2312) and/or the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken;
- Construction managers/foremen should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites;
- A map of the identified palaeontological resources relative to the layout of the proposed development must be emailed to the SAHRA case officer and the ECO must monitor all excavations associated with the OHL and switching station;
- A Palaeontological Chance Finds Procedure (attached) must be implemented for all excavation activities.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:

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- The conditions included in the Final Comment for SAHRIS Case ID 15452 are valid for this development and must be adhered to;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer

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INFRASTRUCTURE, INCLUDING 132KV OVERHEAD POWERLINE, SWITCHING
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South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/543862>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.