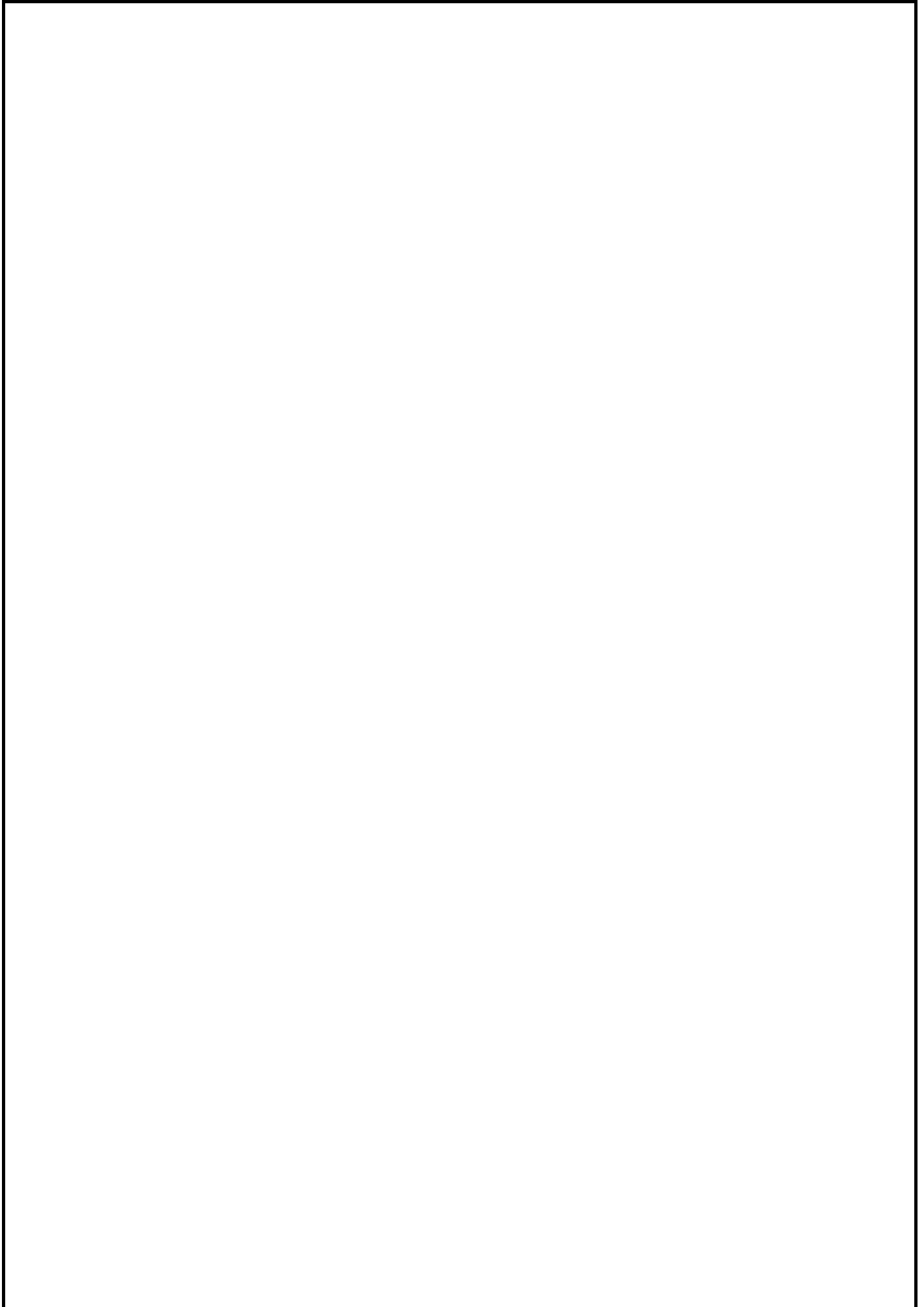


APPENDIX 9_10

COMMENTS AND RESPONSES REPORT



COMMENTS AND RESPONSES REPORT FOR THE PROPOSED PROVINCIAL ROAD K77: ELIZABETH ROAD TO K154, MIDVAAL LOCAL MUNICIPALITY, GAUTENG

GDARD Ref: GAUT: 002/14-15/0188

SUBMITTED TO:

Gauteng Department of
Agriculture and Rural
Development:
Sustainable Utilisation of
the Environment Branch
P.O. Box 8769
Johannesburg
2000

APPLICANT:



GAUTENG PROVINCE
ROADS AND TRANSPORT
REPUBLIC OF SOUTH AFRICA



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November 2016

REPORT TITLE	:	Comments and Responses Report in terms of the Final EIA Report for the Proposed Road K77: Elizabeth Road to the K154, Midvaal Local Municipality, Gauteng Province
CLIENT	:	Gauteng Provincial Department of Roads and Transport
REPORT STATUS	:	EIA Phase: Final
GDARD PROJECT REFERENCE	:	GAUT 002/14-15/0188
PLACE AND DATE	:	Pretoria, November 2016

APPLICANT

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DECLARATION OF INDEPENDENCE

I, JC van Rooyen as authorised representative of SPOOR Environmental Services (PTY) Ltd. hereby confirm my independence as an Environmental Assessment Practitioner and declare that neither I nor SPOOR Environmental Services (PTY) Ltd. have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which SPOOR Environmental Services (PTY) Ltd. was appointed as Environmental Assessment Practitioner in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), other than fair remuneration for worked performed, specifically in connection with the Proposed Detail Design and Construction of Road K77 between Elizabeth Road and the R550 (K154), Midvaal Local Municipality, Gauteng.

Signed.....

Date.....

DISTRIBUTION OF ENVIRONMENTAL IMPACT ASSESSMENT

PUBLIC			
Area	Venue	Location	Contact Person
Drumblade, Midvaal Local Municipality	The Old "Touch of Green Nursery" 19 Elizabeth Road, Drumblade AH, Midvaal	19 Elizabeth Road, Cnr Elizabeth Road and Joan Avenue Drumblade AH, Midvaal	Mrs V Geffen 084 526 9195

INSTITUTIONS	
Name	Institution
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Mr. K. Govender	Gauteng Provincial Department of Roads and Transport
Mr. J. Viljoen	Knight Piésold Consulting
Mr. L. Mabona	Department of Water and Sanitation
Mr. S. Manele	Sedibeng District Municipality Transport Infrastructure and Environment (Executive Director)
Mr. H. Human	Midvaal Local Municipality Department Development and Planning (Executive Director) Division Environmental Management
Mr. S. Coetzee	Midvaal Local Municipality Department Engineering Services (Executive Director)
Mr. B. Welchman	Midvaal Local Municipality Department Engineering Services
Mr. N. Mashele	Midvaal Local Municipality Department Engineering Services Civil Engineering Services (Director)
Mr. R. Maswime	Midvaal Local Municipality Department Engineering Services Division Roads (Assistant Director)

Mr. A. Kilian	Gauteng Department of Roads and Transport
Mr. G. Botha	Provincial Heritage Resources Agency Gauteng (PHRAG)
Mr. A. Solomon	South African Heritage Resources Agency

DOCUMENT HISTORY

Report	Date	Version	Status
K77_I&AP_Comments and Responses Report: Draft Scoping Report	February 2015	1.0	Draft
K77_I&AP_Comments and Responses Report: Final Scoping Report	April 2015	2.0	Final
K77_I&AP_Comments and Responses Report: Draft EIA Report	June 2016	3.0	Draft
K77_I&AP_Comments and Responses Report: Final EIA Report For Public Review	August 2016	4.0	Final
K77_I&AP_Comments and Responses Report: Final EIA Report For GDARD Submission	November 2016	5.0	Final

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ABBREVIATIONS

AH	-	Agricultural Holding
BA	-	Basic Assessment Report
BID	-	Background Information Document
CPF	-	Community Policing Forum
CLO	-	Community Liaison Officer
DEA	-	Department of Environmental Affairs
DEAT	-	Department of Environmental Affairs and Tourism
DWS	-	Department of Water and Sanitation
EAP	-	Environmental Assessment Practitioner
ECA	-	Environment Conservation Act
EIA	-	Environmental Impact Assessment
EIAR	-	Environmental Impact Assessment Report
EMPr	-	Environmental Management Programme
GDARD	-	Gauteng Department of Agriculture and Rural Development
GPDRT	-	Gauteng Provincial Department of Roads and Transport
GVA	-	Gross Value Added
IEM	-	Integrated Environmental Management
IDP	-	Integrated Development Plan
I&AP	-	Interested and Affected Parties
ISDF	-	Integrated Spatial Development Framework
MAMSL	-	Metres Above Mean Sea Level
MLM	-	Midvaal Local Municipality
ML/D	-	Mega Litre per Day
NEMA	-	National Environmental Management Act
NEMBA	-	National Environmental Management Biodiversity Act
NEMWA	-	National Environmental Management Waste Act
NFEPA	-	National Freshwater Ecosystems Priority Areas
NHRA	-	National Heritage Resources Act
NMD	-	Notified Maximum Demand
OHS	-	Occupational Health and Safety
PHRAG	-	Provincial Heritage Resources Authority of Gauteng
PVW	-	Pretoria Vereeniging Witwatersrand
QDSG	-	Quarter Degree Square Grid
SABS	-	South African Bureau of Standards
SAHRA	-	South African Heritage Resources Agency
SDM	-	Sedibeng District Municipality
SDF	-	Spatial Development Framework
S&EIR	-	Scoping and Environmental Impact Report

1. INTRODUCTION

SPOOR Environmental Services (Pty) Ltd. has been appointed by the Gauteng Provincial Department of Roads and Transport (GPDRT) to assist with the requirements of the Environmental Impact Assessment process in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for the Proposed Detailed Design and Construction of Road K77 between Elizabeth Road and the R550 (K154), Midvaal Local Municipality, Gauteng.

This report, together with the detailed Comments & Responses Register, provides a chronological account of the Public Participation Process conducted by the Environmental Assessment Practitioner (EAP) to date.

The process included:

- ❖ Creating initial awareness to all relevant Interested and Affected Parties by distribution of Background Information Documents, putting up of site notices and placing an advertisement in a prescribed newspaper;
- ❖ Giving an opportunity to register as a stakeholder in the public participation process and make comments on and contributions;
- ❖ Facilitating a Public Open Day to communicate more project information to stakeholders and give the stakeholders an opportunity to list issues and recommendations;
- ❖ Responding to the comments received from the I&AP in the initial awareness and during the public open meeting;
- ❖ Giving an opportunity to the stakeholders to comment on the various Scoping & Environmental Impact Assessment Reports.

2. PUBLIC PARTICIPATION PROCESS (PPP)

The PPP forms a fundamental part of the Scoping and Environmental Impact Assessment process. Its aim is to provide an opportunity for all interested and affected parties (I&APs) to obtain clear, accurate and comprehensive information about the proposed development, its alternatives and the anticipated environmental impacts thereof. In addition, the process provides I&APs with the opportunity to indicate their viewpoints, issues and concerns regarding the proposal and/or alternatives. All inputs from the public, and interested and/or affected groups are considered in the planning stages of the project development. As a result, a clear recording of all issues raised and comments made is maintained in the register of comments and responses. This register is updated as and when new comments and concerns are raised and considered.

The following phases allow I&APs to make comments during the Scoping & EIA process i.e.:

Phase 1: Initial Public Awareness;

Phase 2: Comment on the Draft Scoping Report;

Phase 3: Comment on the Final Scoping Report;

Phase 4: Public Open Meetings or Open Days;

Phase 5: Comment on the Draft Environmental Impact Report;

Phase 6: Comment on the Final Environmental Impact Report; and

Phase 7: Environmental Authorisation.

The image below illustrates the PPP phases diagrammatically. At the time of submission of this report the PPP was at the beginning of Phase 5 where I&APs were encouraged to comment on the Final EIA Report. A summary of the PPP during Phase 1, 2, 3 and 4 follows in the section below.

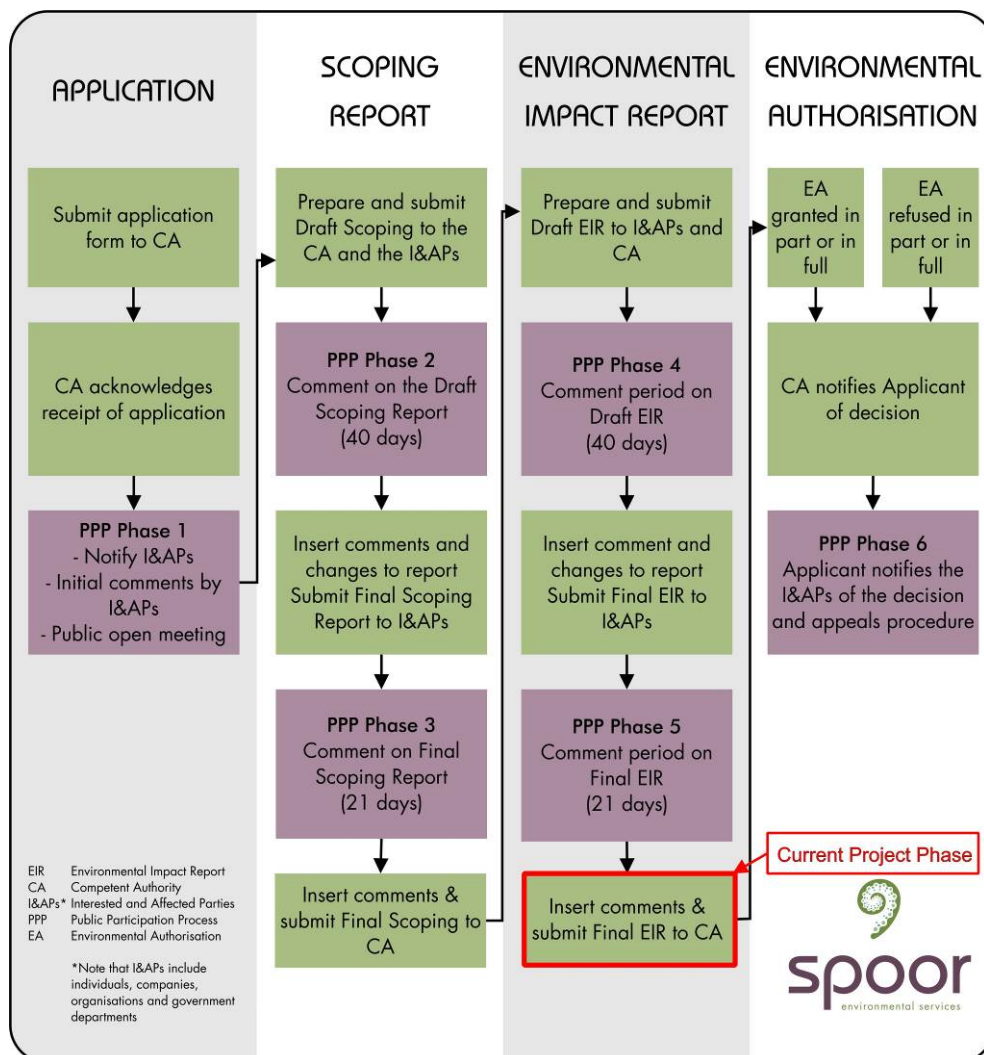


Figure 1: Public Participation Process

3. PUBLIC PARTICIPATION PROCESS PHASE 1

3.1. Initial Public Awareness

Initial awareness of the proposed development was created via the distribution of the Background Information Documents, the placement of site notices along the linear development and the placement of a newspaper advertisement in a locally distributed newspaper.

3.1.1. Background Information Document (BID)

A BID was drafted that informed potential I&APs of the following:

- ❖ The background of the project;
- ❖ Proposed development description;
- ❖ Project location;
- ❖ Listed Activities in terms of NEMA (Act 107 of 1998)
- ❖ Explanation of what the Scoping Report process entails;

- ❖ I&AP involvement in the process;
- ❖ Details of the Applicant;
- ❖ Contact details of the EAP;
- ❖ A locality map of the proposed development area; and
- ❖ A form for I&APs to register.

The BID was initially distributed to the relevant identified I&APs during mid-January 2015. BIDs were also forwarded to additional I&APs during the remainder of the Scoping & EIR process. The BID was distributed to the following stakeholders:

Immediate Neighbours and Adjacent Landowners

Adjacent landowners (within 100m of the proposed alignment) and property owners received the BID notices via hand delivery during the door to door site visits, registered mail, email or fax. In cases where no response was received from these landowners, information was obtained from other sources i.e. the local ward Councillor the deed search platform, neighbouring landowners, town planning Consultancies in the area etc.

Ward Councillors

Cllr. Rob Jones of Ward 5 and Cllr. Matsose received the BID via email. Cllr. Jones distributed the BID to approximately 80% of the residents via his database.

Local Authorities

The BID was forwarded to Midvaal Local Municipality's Department of Development and Planning, - Engineering Services, -Protection Services and the De Deur and Klipriver branch of the South African Police Services.

Government Departments

The Department of Water and Sanitation, the Gauteng Province Department of Roads and Transport, the South African Heritage Resources Agency (SAHRA), the and the Provincial Heritage Resources Agency of Gauteng.

Other NGOs, CBOs, Conservancies, Resident Associations & Service Providers

The BID notices were distributed to the service providers Eskom, Telkom, Sasol and the Rand Water Board as well as the Klipriviersberg Sustainable Association and the Drumblade Conservancy.

Other

The BID was also distributed to community leaders that are not directly affected by the development.

A copy of the BID is attached in Appendix 9_3 of the Final EIA Report.

3.1.2. Site Notices

Detailed site notices in accordance with the requirements of the NEMA regulations were placed at 3 strategic and visible places along the proposed road K77 between Elizabeth road and the R550 on the 14th of January 2015. A copy of the site notice and proof of placement is attached as Appendix 9_1 of the Final EIA Report.

3.1.3. Newspaper Advertisements

A newspaper advertisement including all factual information and a description of EIA process was placed in the Citizen newspaper on the 13th of January 2015. A copy of the abovementioned newspaper advertisement is attached in Appendix 9_2 of the Final EIA Report.

3.2. I&AP Registration and Initial Comments

I&APs were registered on an I&AP database on their response to the BID, advertisements and site notices. Concerns, requests and suggestions from I&APs were listed in the Comments and Responses register. The EAP communicated relevant information to all registered I&AP throughout the Scoping Report process to date, in order for them to respond and comment on the proposal.

3.3. Summary of Comments Received During Phase 1

Immediate Neighbours and Adjacent Landowners

In short the following aspects were noted as the main concerns of the other I&APs not directly affected:

- ❖ Disturbance of tranquillity; and
- ❖ Surety from GPDRT that physical damage will not take place on adjacent properties.

Ward Councillors

No comments were received to date.

Government Departments

No comments were received from any State Department.

Local Authorities

No comments were received to date.

NGOs, CBOs, Conservancies, Residential Associations, Service Providers

- ❖ Eskom

Mr. V Nyamane of the Land Development Department, Land and Right Section, informed the EAP that no Eskom Distribution or Reticulation Services are affected by the Development and thus had no objection to the Development. It was noted that if construction was under or in close proximity to an Eskom line, that Mr. Abie Schoeman be notified at least seven days before construction commences.

- ❖ Telkom

Gauteng Wayleaves replied with the wayleave application requirements.

- ❖ Rand Water

Ms. Lindiwe Gamede stated that Rand Water is not affected by the development.

- ❖ Conservancies

KlipSA made the following comments. They enquired whether:

- ❖ a 6-lane road was necessary and if a possibility exists to avoid construction by upgrading existing roads;

- ❖ an alternative alignment can be discussed to avoid cutting through farm land;
- ❖ under- or over passes can be constructed to accommodate safe movement for species;
- ❖ the general area can be preserved as a continuous ecological unit as there is an abundance of wildlife visible.

Other

In short the following aspects were noted as the main concerns of the other I&APs not directly affected:

- ❖ Necessity of a 6-lane road;
- ❖ Construction timeline;
- ❖ Influx of labourers to the area;
- ❖ Environmental degradation; and
- ❖ Stakeholder involvement.

The EAP responded to each of the aspects raised above and the responses are summarised in the paragraph below.

3.4. Summary of Responses during Phase 1

The summary below provides a quick overview of the responses made by the EAP on the principle comments raised by the stakeholders. Feedback in this report represents that included up to the submission of the Draft Scoping Report.

Immediate Neighbours and Adjacent Landowners

The EAP provided the following responses to the I&APs concerns:

- ❖ The EAP noted the I&AP's concern of the disturbance of tranquillity;
- ❖ In terms of surety from required from GPDRT that physical damage will not take place on adjacent properties, the EAP replied that his requests will be discussed with the design engineer. These comments were also included as social impacts in the Draft and Final EIA Reports and subsequently taken up in the Draft EMPr.

Other NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ Eskom
The EAP forwarded their comments to the Project Manager at the Design Engineer.
- ❖ Telkom
The EAP forwarded their comments to the Project Manager at the Design Engineer.
- ❖ Rand Water
The EAP forwarded their comments to the Project Manager at the Design Engineer.
- ❖ Conservancies
The EAP replied to KlipSA by making the following comments. They EAP stated that:
 - ❖ the section of K77 under the SPOOR application will be connected to alignments to the north and the south of that to serve future development in the area. In addition, although the application is for six lanes within a 62-meter reserve, only a two-lane dual carriageway will be constructed at present. The rest of the lanes will follow as the demand for this is realized. The

EAP would however put the I&AP in contact with the design engineers in terms of your request to understand the planned road network for the larger area.

- ❖ SPOOR understood that in terms of cutting through farm land, a number of other alignments were considered for this section of the K77 but that this clashed with existing development proposals for the area. The existing route is presented as the one developed over a space of the last two years and one that fits into the GPDRT's road planning as well as that of the Midvaal Municipality and private property developers.
- ❖ The I&AP's comment of providing safe movement passages for the fauna will be brought under the Biodiversity Specialist's attention and request them to provide comment on the proposal.
- ❖ The EAP took note of the I&AP's suggestion that the area should be preserved as an ecological unit and will be sure to assess this as part of the EIA. The comment will also be forwarded to the design engineers for their consideration.

Other

The EAP replied to the other I&APs in the following way:

- ❖ The EAP addressed the concern for a 6-lane road which will cause environmental degradation by stating that the road has been designed to its maximum capacity, but will be constructed in phases to satisfy the current traffic demand. Phase one will only require the construction of two lanes, one in each direction. As the demand increases in the future, the road width will increase accordingly. It was also mentioned that it was understood from the information gathered to date that the section of road relevant to SPOOR's application will connect to additional road infrastructure to serve future development in the area.
- ❖ The EAP replied that the construction timeline for the K77 was not yet known as the EIA process led the process and could influence the anticipated construction timeline a great deal. The EAP stated that he will inform the I&AP if new information became available.
- ❖ The EAP took note of the I&AP's concern of the influx of labourers in the area.
- ❖ The EAP explained that in terms of stakeholder opportunities, SPOOR is in the initial stages of the Environmental Impact Assessment (EIA) for the proposed road and will provide more detail on the project and related meetings during the remainder of the EIA process.

The detailed comments and responses are included in Appendix A of this Report.

4. PUBLIC PARTICIPATION PROCESS PHASE 2

The Draft Scoping Report was presented for review on the 26th of February 2015 giving I&AP's an opportunity to comment. All comments received during the Draft Scoping Report review period was noted in the Comments and Responses Register and are included in Appendix A of this report.

4.1. Summary of Comments received during Phase 2

NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ KlipSA made the following comments.
- ❖ They requested whether the heritage specialist could investigate the presence of Khoisan remains on the site particularly as a report undertaken by Prof TN Huffman in July 2009 identified two sites with ruins associated with Khoisan settlement to the north of the R550.

- ❖ The Chairman stated that the road development will facilitate channelled stormwater inflow into the wetland, rather than diffuse flow as would occur if the road was not built. The wetland in the area displays signs of being a low energy system, so channelled stormwater entering the system may result in channel incision. In his opinion consideration should therefore be given to preventing this as they believe that could be achieved in several ways and would like to see what the specialist recommends.
- ❖ Mr Barker further explained that with regards to the wetland delineation, there is the one obvious wetland crossing, and what appears to be another not-so-obvious wetland crossing. It would be interesting to see what areas the wetland specialist focuses on. In this regard, we would recommend that the wetland specialist indicate, on a map within their report, their auger points so that we can determine that the full extent of the road has been taken into consideration in the delineation process.
- ❖ Of particular concern, the report indicates that a water use licence has already been submitted to DWS for the project, yet they indicate that a wetland delineation will still be done for the project. If the water use licence was indeed submitted, a wetland delineation should already have been done, along with the determination of Present Ecological State (using either Wet-Health or Wet-IHI), the determination of the ecosystem services (using Wet-Ecoservices) and the determination of the Ecological Importance and Sensitivity of the wetland, as part of the application process. Therefore, we would recommend querying the suitability of the WULA application prior to the wetland delineation. If a wetland assessment has already been done, please make it available for review.
- ❖ KlipSA believe that DWS will require all wetlands within a 500m radius to be delineated and the risks associated with the proposed road construction to be determined for those wetlands (under GN1199). This will all have to be done by the wetland specialist, and will provide further details on whether additional water use licence applications will need to be applied for other than those for just the crossing. Clarity in this regard is required.
- ❖ KlipSA asked that consideration be given to the fact that the purpose of the road is to facilitate development within the larger area. The additional development will essentially constitute a cumulative impact on the wetland and associated wildlife within the area. Therefore, the EAP must consider this cumulative assessment during the EIA phase. It is of critical importance that the context is taking into consideration and not only consider the road footprint but also the resultant surrounding development impacts. This will have implications with regards to the mitigation measures that are proposed by the various specialists, i.e. if the road is to be constructed to facilitate development in the area, the purpose and effectiveness of things like wildlife bridges will be questionable. Further, it will be pointless for the EAP to propose things like gabion structures for the purpose of the road crossing, if the area becomes developed, and the urban runoff will result in the structures failing in the near future.
- ❖ The Chairman stated that the most significant omission from this report (and an issue generally ignored in EIA's) is habitat fragmentation. KlipSA suggests this should form part of the evaluated assessment of impacts together with the other components evaluated, such as vegetation, fauna etc. etc. There is no doubt that this road, if approved, will bisect one of the most important large open space areas in Walkerville. It will impact the movement of species, and hence survival of many of the extant species, not only locally but regionally. Habitat fragmentation is sadly neglected in most EIA reports and yet it is possibly one of the most important regional impacts influencing the long term environmental sustainability of the remaining open spaces. It is a problem not only in SA, but internationally. The quote below is from a book by Davide Geneletti called 'Ecological

evaluation for environmental impact assessment':

- ❖ "The weakness of the analysis of ecological impacts, such as the loss and the fragmentation of natural ecosystems, limits the influence of these issues on the decision-making process. Ecological consequences are bound to play a minor role in the authorisation of a development because their relevance is not sufficiently stressed and justified in the EIS"

Other

An I&AP contacted the EAP for a route map of the proposed road to determine if a nesting pair of White-bellied Korhaan will be affected by the development. The I&AP studied the maps and confirmed that they will not be affected.

The EAP responded to each of the aspects raised above and the responses are summarised in the paragraph below.

4.2. Summary of Responses during Phase 2

The summary below provides a quick overview of the responses made by the EAP on the principle comments raised by the stakeholders.

NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ The Kliprivier Sustainability Association made the following comments:
The EAP assured the I&AP that his comments regarding wetland and heritage issues would be forwarded to the respective specialists for their comment and that the EAP would revert back to him as soon as their comment became available.

Other

- ❖ The EAP supplied the I&AP with the relevant maps to determine whether a pair of nesting White-bellied Korhaan will be affected due to the proposed road.

5. PUBLIC PARTICIPATION PROCESS PHASE 3

The Final Scoping Report was distributed on the 15th of April 2015 (Appendix 9_6 of Final EIAR), giving the I&APs 21 days to comment on the report. A hard copy of the report was made available to the public for review at the Walkerville Showgrounds.

5.1. Summary of Comments received during Phase 3

No comments were received during public participation Phase 3.

5.2. Summary of Responses during Phase 3

No responses were given as no comments were received.

6. PUBLIC OPEN DAY

6.1. Introduction

SPOOR Environmental Services (EAP) hosted a public open day at a venue (The Old Touch of Green Nursery) which is situated in close proximity (1 km from the southern access) to the site of the proposed road alignment. The open day was held between 12:00 and 18:00 on Wednesday the 18th of May 2016.

Mr. JC van Rooyen from SPOOR hosted the Open Day. The Final Scoping Report as well as all Specialist reports and the relevant mapping were displayed at the open day and I&AP's were invited to study these documents at their leisure. Mr. JC van Rooyen answered questions regarding the proposed road development and also provided contact details of the relevant Specialists and consultants where this was required.

The Public Open Day was reasonably well attended by a mixture of existing and new I&AP's. The bulk of the attendees needed more information on the route of the proposed alignment to the south of Elizabeth road. As this falls out of the scope of the current EIA process the EAP assisted these I&AP's by providing detail of the EAP who is responsible for the EIA process for this southern section of the alignment. Other comment ranged from positive feedback regarding the possibility of a shorter route towards the R59 to a dissatisfaction with the fact that the road will bring development into this tranquil region as well as a concern for the existing wildlife of the area. These concerns were all taken up in the Minutes of the meeting as well as in the Impact Assessment itself as well as the project EMPr. See Appendix 9_7 of the Final EIA Report.

7. PUBLIC PARTICIPATION PROCESS PHASE 4

The Draft EIA Report was distributed in digital format on the 4th of June 2016 (Appendix 9_8 of Final EIAR), providing the I&APs with an opportunity to comment on the report. A hard copy of the report was made available to the public for review at the "Old Touch of Green Nursery" at 19 Elizabeth Road, Drumblade AH, Midvaal.

7.1. Summary of Comments received during Phase 4

Other Parties

- ❖ Mr Straffen Short of Trinamics Consulting Engineers made the following comments:
You may be interested in the attached. It is a compilation of various roads planning initiatives in the area.
 1. We are attending to a draft alignment of the 'new' K77 between K154 (in the south) and K144 (in the north). This road joins up exactly per the design drawings of 'your' K77 supplied to us by Mr. Jannie Viljoen. The Environmental consultant is Dr. Gwen Theron from Leap.
 2. We are also attending to the traffic issues & road planning for the proposed Gateway Eco Estate township situated on parts of the farm Driefontein 146-IR and Rem of Ptn 1 and Ptn 4 of the farm Roodepoort 149-IR. The developers are Central Developments, Ms. Sonja Meissner-Roloff is the Town planner and Leap is the environmental consultant. A township application was submitted x2 weeks ago.
 3. Gautrans is busy attending to the route determination for proposed re-alignment of K89 from its current position in the east westwards to intersect with the 'new K77' and further westwards up to the proposed Gateway Eco Estate. Arup (Mr. Mike Kelly) is the design engineer. They are also attending to proposals for a new interchange of K89 & R59 freeway (the interchange is not indicated on my drawing, but it is spaced exactly halfway between the Klipriver off ramp at Heineken &

Kliprivier off-ramp in Brackendowns).

4. We are also, on behalf of Midvaal Local Municipality, attending to draft proposals for the *Midvaal Spine Route*– a north-south class 3 road in-between the R59 freeway and K77, from Brackendowns in the north to Samancor in the south. A rough alignment thereof is indicated on my drawing.

❖ Mr H Schutte from Mulbarton made the following comments:

1. I noticed that the “Gauteng Highlands Development” might as well be assumed to represent “Blue Rose Developments” as many of the properties are either owned by that entity, or some in the process of being acquired by them. To what extent is Blue Rose a driving force behind this road? To perhaps provide easier access to the R59! {Blue Rose I think was also involved with The Eye of Africa Development.}
2. 2.1 page 9 Refers to “this 4.3km section is the middle section of an alignment that will stretch further north and south”. [At the moment it will be a 4.3km section between nothing and no-where. Why start in the middle and not perhaps at either end? No indication is given on the plans/maps/diagrams from where and to where this north and south ‘extensions’ might go to/come from.
3. It goes on to quote daily traffic estimate of 2938 vehicles of which 2507 is expected to be heavy vehicles! Where and how is that volume of heavy traffic going to be generated from or to within Drumblade? Is the north and south extension that are being kept secret at this stage planned to replace the R9 which at the moment carries a large volume of heavy vehicles? What will the R59 then be used for of heavy vehicles is going to be “diverted” onto this new road that is set to grow to 6 lanes.
4. Is the road reserve of the R59 not wide enough to add additional lanes to accommodate the expected increased traffic?
5. If the K77 extends to the north, is it not going to cut through the planned “Kliprivier residential Estate” Do they know about this? Or is it perhaps part of the strategy to facilitate better access to the proposed Kliprivier residential estate on a portion of the farm Driefontein 146-IR
6. What possible other major “high traffic generating” developments are planned in the surrounding areas that this road is to cater for? Which are not clearly outlined at this stage?
7. Your report mentions a development that will go by the name “The Grace”, done by Blue Rose. Where is that indicated on your maps?
8. How desirable is the vastly increased noise and diesel fume pollution going to be to these new “upmarket developments”?
9. Dealing only with this section of the K77 bigger picture strikes me as simply the “thin end of the wedge” once that is in then it is going to be so much easier to just “bulldoze” along. {pun intended}
10. 6.3 No Go alternative: Third bullet, casual mention is made of the coming commercial, industrial and residential developments planned for the area, BUT NO DETAILS provided. What blank cheque are we signing by approving “this section” without knowing what the further implications are going to be?
11. 7.4.8: If ever there was “economy with the truth” this must be it. “air quality is

expected to decrease SLIGHTLY from increased traffic". Surely the anticipated 2507 heavy vehicles per day mentioned earlier will do more than "slightly increase" the air Quality!!!

12. I am well aware that this road (K77) is just a small part of a very elaborate road network that was planned on a table top almost 50 years ago. How necessary is it to still follow that same line of thinking?

- ❖ The EAP responded on each point above and forwarded this response to Mr Schutte. Mr Schutte in turn thanked the EAP for the response.

NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ The Kliprivier Sustainability Association made the following comments:

Mr A Barker (The Chairman) apologised for the late submission. He stated that the KlipSA had a technical glitch with e-mails between members of the Sustainable Development Team and himself and he had only received the following comments on the morning of the 19th of July. He asked that the EAP would still accept their submission. The following comment were made:

1. Habitat unit 2 is indicated to be "transformed", the reasoning given was indicated to be residential development, roads and disturbed veld. It should be noted that 'disturbed' does not correlate with 'transformed'. Transformed would indicate a complete loss of ecosystem function, whereas 'disturbed' indicates ecosystem functioning still present. This is especially relevant when considering the Critical Biodiversity Area designation of the study area (vegetation that is disturbed can still fulfil a function that will support fauna of conservation concern, so can still be classified as a CBA);
2. No indication as to when the fieldwork was conducted is provided within the report, although the report is dated July 2015. It is therefore assumed that fieldwork was not undertaken within the prescribed survey period of GDARD for botanical surveys. Give the CBA designation for the study area and the reasoning therefore (including orange listed flora and primary vegetation), a detailed ecological study within the flowering period of the relevant floral elements is required to inform the study;
3. The report indicates that suitable habitat exists for *Tyto capensis* (Grass Owl), for which the CBA was designated. Therefore, CBA designation is supported (not mentioned in report). Further, Secretary Birds are often observed within the study area (personal observation), further supporting CBA designation, yet this species is not elaborated on. Mitigation measures should further speak to these aspects and flight/hunting patterns of the species in question, especially given the potential for road collisions at particular times of the day.
4. No consideration for bird species of conservation concern is given in Section 6.7
5. Figure 16 indicates extent of wetland features relative to soil auger points. Based on Figure 16, it can be deduced that only three (3) holes were augured in the investigation of wetland characteristics, none of which correlate with wetland features identified. It can therefore be concluded that confidence and accuracy of

- extent of the wetland features associated with proposed road is questionable. A more detailed wetland assessment is therefore required by a suitably qualified wetland specialist.
6. Given the above identified issues within the ecological component of the study (CBA designation, timing of survey, species of conservation importance, etc.), it is unclear as to how the specialist regards the wetland as being of low biodiversity importance (section 7.3). A similar comment can be made for values obtained in Ecological Importance and Sensitivity assessment.
 7. Method used for determination of Ecological Importance and Sensitivity is not based on current approach of Department of Water and Sanitation, but rather a modification of an old approach that does not consider regional context or conservation status of regional wetland vegetation type.
 8. Means of interpreting Ecological Importance and Sensitivity of the identified wetland based on present ecological state classes is incorrect.
 9. According to Section 8.2, vegetation indicator was used as an indicator of wetland conditions, yet soil indicators were not. According to the wetland delineation guideline (DWA, 2005), the use of the vegetation indicator requires undisturbed conditions, which are not present according to the specialist, therefore further supporting the conclusion that the wetland delineation is inaccurate.
 10. Although recommendations regarding wetlands are provided, these are minimal and do not consider mitigation of possible head cut or gully erosion as a function of culvert/bridge design and installation.
 11. The inclusion of terrestrial underpasses adjacent to the wetland is poorly considered and detailed. GDARD minimum requirements provide greater detail than that provided in specialist report, yet are not provided.
 12. In consideration of the above comments, the specialist terrestrial scan and wetland impact report as developed for the proposed study does not represent an accurate reflection of the associated sensitivities present. As such, the following is required to better inform the application:
 - a. given the CBA designations associated with the proposed activity, a detailed ecological assessment is required within the flowering period of the species associated with the CBA designation in order to confirm/exclude the occurrence and population size of the relevant species;
 - b. further studies regarding potential road impact of bird species of conservation concern should be evaluated;
 - c. a more detailed wetland delineation assessment using all available wetland indicators and EIS assessment including results obtained from the detailed ecological assessment is required to inform the application;
 - d. based on the results obtained during revised studies, impacts will need to be re-assessed and more suitable mitigation and rehabilitation measures recommended.

❖ The detailed responses from the EAP is included in the section below.

7.2. Summary of Responses during Phase 4

The summary below provides a quick overview of the responses made by the EAP on the principle comments raised by the stakeholders during the review of the Draft EIAR. Feedback in this report represents that included up to the submission of the Final EIA Report to the I&APs for comment.

Others

- ❖ The EAP responded to Mr. Short by noting his comments.
- ❖ The EAP thanked Mr. Schutte for his comment on the Draft EIA Report and submitted responses as far as this was possible. Responses was provided below each question/statement. The following accounts were given.
 1. SPOOR was appointed as the Environmental Assessment Practitioner for the EIA process by Knight Piésold Engineers who were appointed by The Gauteng Roads Department. We have no appointment with the Blue Rose Blue Rose Group other than to engage them as part of the EIA process as per the EIA regulations.
 2. SPOOR was appointed for this section of road only. On appointment, we asked the same question the Design Engineers and it was put to us that it is a budgetary issue and that the road will be developed in stages. We understand that Consultants have been appointed for the other sections of roads to the north and south as well but do not have detail regarding what stage their applications are at. We also received a copy of the proposed alignment of the K77 to the north and south of the section represented under this application from an Engineer appointed by the Midvaal Municipality and by other developers in the area. I attached it to this correspondence for your information.
 3. It is our understanding as per the traffic impact assessments included in the draft EIA as well as the discussions with the Road Department that the proposed K77 will be constructed to alleviate future heavy traffic volumes on the existing roads in the area. The R59 was also taken into account during these studies.
 4. We do not know the answer to this question. We believe however that the intention of the proposed K77 is to provide additional traffic infrastructure to the existing infrastructure and also to different areas than that which the R59 serves.
 5. SPOOR was only appointed for the section of road presented in this application. We had meetings with the Roads Department where other parties including the Midvaal Municipality and Developers to the north of the K154 were also represented. During these meetings the main aim was to ensure that the position where the proposed road under this application connects with the K154 and Elizabeth Road in the south, are in the position as authorized by the Gauteng Roads Department.
 6. SPOOR is only aware of those mentioned in the Draft EIA and that which was provided to us by the Traffic Engineering Consultant mentioned in the second bullet.
 7. It is shown in the drawings included under the Road Alignment Detail under Appendix 1.
 8. These developments were taken into account in the Specialist assessments and

associated mitigation measures were recommended. These recommendations will need to be re-evaluated from time to time to measure their effectiveness and adjusted accordingly.

9. Noted.
10. Your concern is legitimate Sir. As aforementioned the purpose of the proposed road K77 is to provide traffic infrastructure for future anticipated development. Our answer would be that each of these developments will need to be scrutinized for their appropriateness on a case by case basis and the environmental impact be assessed.
11. The context of this statement is made in the light of better air quality as a result of better traffic flow where traffic congestion creates decreased air quality. You are accurate in your comment though and we will update the report accordingly.
12. Noted Sir. This assessment is part of the detailed site assessments to review the original planning and make the required adjustments.

- ❖ The EAP furthermore verified that Mr. Schutte's comments would be represented in the Final EIAR.

NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ Responses by the EAP to the comment provided by The Kliprivier Sustainability Association (KlipSA) was as follows:
- ❖ The EAP firstly replied to KlipSA in that they would put the comment received to the Biodiversity Specialist and reply in due course. The Biodiversity Specialist replied in the following manner:

The study focused on sensitive habitat and the conservation thereof, which would, in turn, conserve sensitive faunal and floral species which utilize such habitat. It is acknowledged that certain species, especially wider ranging faunal species such as birds and mammals, may utilize transformed/disturbed habitat on the margins of such sensitive areas for foraging and migration, but the fact remains that they primarily depend on their preferred habitat for breeding and habitation. Thus, it is the professional opinion of the authors of the report that by ensuring continued existence of sensitive habitat as recommended in the report, associated sensitive species will be conserved.

1. The majority of the vegetation associated with the study area, although classified as a CBA, has been previously cultivated as confirmed by aerial map analysis (presence of cultivation lines) and on-site evidence as mentioned in the report. Therefore, the description of 'transformed' vegetation best described the state of vegetation at the time of assessment. Notwithstanding, the mitigation measures as set out in the report are deemed sufficient to still support the CBA classification of the surrounding environment and to protect sensitive habitat as encountered on-site.
 - ❖ The EAP Added that to clarify, in terms of the reasoning in the Draft EIAR for the "transformed" nature of the habitat previous low residential areas (agricultural plots) were referred to and not residential development i.e. township area or the like.

2. The assessment was performed in November 2014 (Refer to Section 2.1 on Page 6 of the report), thus falling within the growing season (summer) and complying to the GDARD minimum requirements.
3. No *Sagittarius serpentarius* (Secretary bird) nor *T. capensis* were recorded during the survey and their respective reporting rates for the Pentad (SABAP) are very low. However as suitable habitat was found within and surrounding the wetland areas, the possibility that these species may occur was recognized. It is further stated in the report that should this species be present, the conservation of the wetland and surrounding buffer zone will ensure that their preferred habitat is protected. Furthermore, speed limit and signage recommendations are given in Section 9 of the report, with specific mention of *T. capensis*. However, the speed limit recommendation will also be advantageous for *S. serpentarius*.
4. Consideration the avifaunal species of conservation concern is presented in Section 6.2 as they have been recorded in the pentad (SABAP). Although species such as *S. serpentarius* and *T. capensis* have been recorded within the pentad, the reporting rate for these species is very low. This was taken into consideration during the probability of occurrence calculations for faunal species of conservation concern, which takes into account species distribution, habitat availability, habitat transformation levels and food availability. As no avifaunal species obtained a score of higher than 60% of occurring within the study area, they were not discussed. Instead, species which may actually occur within the study area and which may be affected by the proposed development were focused on. However, as stated, the primary recommendation was that the rocky ridge and wetland and associated buffer be preserved and in turn, habitat for species such as *T. capensis* will be conserved.
5. It is unclear why only two auger points show on the map, when in fact several auger holes were sampled to determine the temporary zone boundary. It was determined that the correct data set was not used in the preparation of the map. However, the report has been amended and replaced with a map showing all the auger holes. The map has also been included in this correspondence for your convenience.
6. The biodiversity maintenance component takes several (12 in total) aspects into account. Thus, various other factors, such as alien invasive vegetation and general habitat degradation also contribute to a lowered biodiversity maintenance component score. The Ecological Importance and Sensitivity methodology etc. is discussed in Point 7 below.
7. SAS is aware of the current (2013) methodology and the author of the method was contacted to provide the methodology, however, to date, no response is forthcoming. The method was however obtained from the WRC after submission of the specialist report to the EAP. The 2009 methodology which was used considers the same components as the 2013 methodology (ecological and socio-cultural services, PES etc.), along with regional wetland and vegetation conservation status (according to the FEPA database) as indicated in the report. Thus, the authors are confident that using the 2013 methodology would have yielded similar, if not identical, results as contained in the report and in no way materially affect the decision making process.
8. The method employed (refer to Section 2.4 of the report for methodology) allows for a certain degree of interpretation and a PES:EIS score of 1 rather than 2 was deemed to more accurately reflect the conditions during the time of assessment as significant transformation (such as agricultural activities) has occurred in the

- catchment. Even if the prescribed score of 2 was allocated, due to the robust nature of the method, the final EIS score would still fall within Class C.
9. As discussed above, several auger holes were sampled in order to aid in the determination of the wetland temporary zone boundary. This can be clarified in the report as per Point 5 above. Furthermore, the vegetation indicator and terrain units were also utilized as set out in the report. The authors are confident that the wetland delineation is accurate and complies with the Department of Water Affairs (DWA) 2005 method
- ❖ The EAP added that despite the above please also note that the proposed alignment was moved from a position where it would have crossed a broader less transformed section of wetland upstream to a proposed position where it crosses the wetland feature at an existing dirt road crossing over this wetland and drainage line.
10. The reader is referred to Section 9.2 of the report where various measures regarding bridge/culvert design and general erosion control, among various other aspects such as rehabilitation, sediment control and a whole host of possible mitigation measures are discussed. This early in the process, detailed bridge designs are not always available, and therefore the mitigation measures are designed to cover a wide variety of scenarios.
- ❖ The EAP added that detailed recommendations in terms of possible head cut or gully erosion were further developed in the Stormwater Management Guideline Document Included as Appendix 4 in the Draft EMPr.
11. According to the GDARD Minimum Requirements, detailed underpass designs are necessary when habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species is traversed. As no sensitive/RDL faunal species which may make use of such underpasses were recorded or are likely to occur within the study area, this component was not elaborated upon, and instead threats such as alien floral invasion and erosion (which are significant problems within the area currently), were addressed.

8. PUBLIC PARTICIPATION PROCESS PHASE 5

The Final EIA Report was distributed in digital format on the 4th of August 2016 (Appendix 9_9 of Final EIAR), providing the I&APs with an opportunity to comment on the report. A hard copy of the report was made available to the public for review at the "Old Touch of Green Nursery" at 19 Elizabeth Road, Drumblade AH, Midvaal.

8.1. Summary of Comments received during Phase 5

NGOs, CBOs, Conservancies, Residential Association, Service Providers

- ❖ The Kliprivier Sustainability Association made the following comments:

Mr A Barker (The Chairman) thanked the EAP for the opportunity to review the final EIAR. They made the following requests and observations:

1. We are still concerned about the design and construction of this portion of the K77 and note that we have not been given an opportunity to discuss the wider network of roads in the area which are based on needs and requirements established in the 1970s. We understand that these roads have been incorporated into later thinking and planning but we question whether the need and desirability of this extensive road network through the area impacting on environmentally sensitive areas outside the urban development boundary has been carefully and properly reviewed.
2. We note that SS Short makes mention of a "compilation of various roads planning initiatives in the area" in his e-mail dated 17 June 2016. We would be grateful if you could forward us a copy of that document.
3. In our earlier communications you said that you would put us into contact with your design engineers. This has not happened.
4. In our submissions we raise concerns regarding cutting through an ecological unit and the need to consider appropriate road crossing measures for fauna. We have not been able to find any further reference or discussion in the report regarding the provision of appropriate crossings.
5. In this regard, in addition to the comments below, we refer you to Ms Wendy Collinson of the Endangered Wildlife Trust's Wildlife and Roads Project to provide you with professional guidance and advice as to what appropriate measures could be implemented.
6. We question whether adequate attention has been given to the evaluation and assessment of the different components of the mitigation hierarchy in terms of the responses to our concerns particularly with regards to the ecological and biodiversity impacts.
7. We are concerned that the heritage consultant is of the opinion that there are no important Late Stone Age sites near the proposed route especially as noteworthy sites have been found and located in the vicinity of the K 77 to the North of the K154.
8. We would request that Chief Adam Mathysen and Ralph Goliath of the Jackson's Drift Khoisan Development Association be consulted regarding the existence of possible sites in the area known to the community.
9. We would request that special measures be put in place for careful examination of all excavations for the construction of the road to ensure that no sites are found or disturbed.
10. We were not able to find any further consideration regarding the additional development and cumulative impacts on the wetland and associated wildlife which we believe would result from the development of this route. Through the report it is as mentioned that extensive township development processes and applications have already resulted and we believe that the cumulative assessment of the developments in this area needs to be further examined with reference to the broader road network of which this is a component.
11. In a similar vein, the impacts on local and regional habitat fragmentation of this component nor of the larger road network has not been addressed as far as we could establish.
12. With regard to the various biodiversity issues which we have raised in previous e-mails, I have provided responses to the comments of your biodiversity specialist (provided in green) below.
13. We trust that these comments and submissions will be considered, addressed and incorporated into the final documentation.

KlipSA's comment on the responses from the Biodiversity Specialist;

1. According to SANBI, the term "transformed" should be avoided as transformation is a widely held positive socio-economic goal in South Africa, so it creates confusion if the biodiversity sector uses it to describe something negative or undesirable. Further, "Irreversibly modified" is an ecological condition class in which the ecosystem has been modified completely, with an almost complete loss of composition and structure, and where all or most ecosystem function has been destroyed and the changes are irreversible. However, this is not the case in the present instance, as previously cultivated land still has function in supporting faunal species of conservation concern (e.g. Secretary Birds have a preference for disturbed grasslands and historic agricultural land), and depending on the date since last cultivation, could have resorted to at least secondary grassland. This is recognised in the Gauteng C-Plan as well as the various bioregional plans, which allows for agricultural landscapes to be classified as Critical Biodiversity Features on the basis of supporting habitat favoured by species of conservation concern such as Secretary Birds, Grass Owls, etc.
2. Recording rates are expected to be low for species of conservation concern, hence their designation of conservation concern. Much of the specialist's response centres in the wetland habitat. However, Secretary Birds have a preference for disturbed/previously cultivated land, as is present within the terrestrial areas surrounding the wetland and buffer. Therefore, protection of the wetland and buffer alone is unlikely to ensure the preferred habitat will be protected. It is further noted that the speed limit as recommended by the specialist in the report (a speed limit of 80km/hour; Section 9.3) is in contradiction with that of GDARD minimum requirements which specifies the following: "Where roads are associated with suitable habitat for Grass Owls, road signs warning motorists to slow down on account of Grass Owls should be erected (in accordance with applicable legislation) and road margins should be regularly mowed to a distance of 5m from the hard edge of the road and/or regularly burned to prevent the accumulation of grass cover that could provide refuge for small mammals. In addition, a maximum speed limit of 60km/h should be enforced through the introduction of speed traps, rumble strips and speed bumps. Where a road-related mortality problem is encountered with other priority species, similar measures may be required".
3. See comment above regarding low reporting rates as well as limiting the protection of habitat to wetland and rocky ridges. Secretary birds have been confirmed to be present on site as well as within surrounding areas, and as such scoring should be 100% probability of occurring within the study area, and accordingly should be focused on.
4. It is of concern that the specialist is unclear as to why the incorrect map was included within the report, especially given that the report is indicated to have already been internally reviewed (see front page of report). It could therefore be concluded that the specialist's own internal quality control process is severely lacking.
5. The specialist should note that the document has been publicly available for some time through the WRC. As specialist consultants, it is the responsibility of the specialists to keep abreast of the latest methodology regarding their field of study.
6. Ecological sensitivity (or fragility) refers to the system's ability to resist disturbance and its capability to recover from disturbance once it has occurred (resilience), which includes sensitivity to changes in floods, low flows/dry seasons, and water quality. These aspects are not considered within the specialist's determination of

Ecological Importance and Sensitivity (only ecological importance components used, but nothing on components relating to ecological sensitivity), therefore invalidating the specialist's/EAP's claim that the 1999 (note: not 2009 as indicated by EAP) methodology which was used considers the same components as the 2013 methodology (it should be further emphasised that the specialist did not use than 1999 version of EIS determination, but rather an adaptation of the 1999 approach developed by the specialist that has not been peer reviewed). The Ecological Importance and Sensitivity of a wetland has nothing to do with Present Ecological State or Ecological Integrity, and as such this should not be considered in the Ecological Importance and Sensitivity determination. It is further incorrect to assign a PES category (i.e. Category A-F) for determination of Ecological Importance and Sensitivity, as these categories relate to the ecological condition of the watercourse in accordance with the Water Resource Classification System.

7. It is questionable whether the method used can be regarded as "robust", as the method has not been peer reviewed or accepted within the wider wetland society. See further comment above that provides additional supporting evidence in this regard, as well as previous comment regarding concern with the use of "transformation".
8. Noted. The specialist and the EAP are both requested to re-consider using "transformed" with regards to wetlands and habitat, as per previous comments.
9. Noted. Specialist should also consider the use of stilling basins in the design of wetland mitigations measures.
10. According to the GDARD requirements "Suitable terrestrial underpasses should be provided to facilitate safe movement of animals, specifically where roads/railways traverse provincially important species/climate change corridors or ridges or habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species." This does not imply that terrestrial underpasses are only exclusively necessary where habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species is traversed, but rather are required where such linear structures would otherwise fragment habitat, especially considering that watercourses and wetlands are preferred movement corridors for various other terrestrial species, regardless whether these species are of conservation importance or not.

8.2. Summary of Responses during Phase 5

The summary below provides an account of the responses made by the EAP on the principle comments raised by the stakeholders during the review of the Final EIAR. Feedback in this report represents that included up to the submission of the Final EIA Report to the GDARD for authorization review. Feedback was provided in the same order as per the comments made by I&AP's in Section 8.1.

❖ Responses to the KlipSA comments.

1. We note your concern. Unfortunately, we can only comment on the section of road that we were appointed for and not the entire network. We understand from the Gauteng Provincial Department of Roads and Transport (GPDRT) that several studies were conducted in terms of the requirement of the network and also in conjunction with the local municipalities. We believe that the relevant authority to contact in this regard would be the GPDRT. The contact detail of Mr K Govender of the GPDRT is included under the Applicant detail of the EIAR and we understand that he is the project manager of the planned K77 network. Mr SS Short is also very knowledgeable with regard to the K77 and other roads in the Midvaal area.

- His detail is included in Appendix 9_10 of the EIAR and has also been attached to this correspondence for your convenience.
2. The document received from Mr Short is attached to this email as requested.
 3. We apologise for not putting you in direct contact with the Engineers. Their contact detail was included in the EIA process from the time of the distribution of the Draft Scoping Report and we viewed this as sufficient for the KlipSA to be able to contact them. However as per your request their detail is included below:
Knight Piésold Consulting: Mr W Hunt (whunt@knightpiesold.com) or Mr S Singh (ssingh@knightpiesold.com) 011 806 7111. Mr Singh is currently the Project Manager and would be the party with the best background knowledge regarding the entire K77 route.
 4. See Point 5.
 5. We contacted Mrs Collison and discussed the proposed road, the EIA to date and also forwarded a copy of the KlipSA concerns included in the draft and final EIA comment stages. We also forwarded the EIA to her which she was kind enough for review. She subsequently provided us with the new EWT document titled: Guidelines to mitigation methods to address wildlife road conflict in South Africa. She also directed us to where we can include these guidelines and the EIAR is currently being updated.
 6. Noted.
 7. See Point 8.
 8. We reviewed the study of Professor T.N. Huffman as per your earlier requests and also obtained the GPS detail of points of possible archaeological materials in the area of the proposed road. We also submitted this to our Heritage Specialist for review. He verified that no materials were found in the area of the proposed alignment. We also contacted Chief Mathysen and Mr Goliath for their inputs. They are also included in this email. We also amended the project EMPr to include the archaeological sensitivities of the area.
 9. Included in the amended EMPr.
 10. We note your comment in terms of cumulative impacts on the wetland and the associated wildlife in terms of the additional developments and the larger road network in the area. Although we cannot include detail mitigation measures in terms of the impacts of the broader road network or the additional developments of the area, our approach to the development of the mitigation measures of this section of road was to look at aspects such as loss of sensitive habitat units, habitat fragmentation, sensitive species and storm water management and to develop the mitigation measures to counter these impacts. We believe that should the GPDRT and the GDARD ensure the implementation of the K77 local scale (Elizabeth to K154) mitigation measures but on the broader route scale, that the cumulative impacts would be addressed. In addition we further believe that the GDARD, in light of the fact that they are the relevant authority and also have the detail of all of the impact assessments and the identified impacts of the proposed developments of this area should assess the identified mitigation measures and make recommendations where required. The relevant impacts assessments should also be distributed to the KlipSA for your inputs.
 11. See comment under point 10. Furthermore, we believe the loss of connectivity as a result of this section of the road has been investigated and mitigation measures developed to reduce the impact. The EIAR will also be updated with the KlipSA recommendations and that of Mrs Collison.
 12. See Comments of Biodiversity Specialist below.

13. As per the public participation process followed since the Notification of the project your contributions will most definitely be included in the Final EIAR.

❖ Responses from the Biodiversity Specialist.

1. The description of the habitat type was amended to 'Modified Grassland' and the possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7 of the Biodiversity Specialist Report. Further mitigation measures to address the possible presence of these species were added.
2. The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10 of the Biodiversity Specialist Report. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7.
3. The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7 of the Biodiversity Specialist Report.
4. SAS apologises for the wrong map insertion. However, it was a bona fide oversight and in no way does it detract from the accuracy of the mapping of sensitive features (including wetlands) in the report.
5. Noted and SAS were aware of it, however bona fide attempts were made to obtain it. Through diligence, it was eventually obtained and is now implemented in all specialist wetland reports.
6. The comment is noted however the concern is not warranted and furthermore is unfounded. The only adaptation made (in some instances) by SAS is that the PES is not obtained from WET Health but from the Wetland IHI method (which was developed by DWS and is well recognised) and which still provides a PES score to fit into the model. This is a negligible variation in the method published since it only requires the input of a PES score from an acknowledged tool for doing so. Furthermore since the published method acknowledges that the PES of the system has an integral and fundamental part to play in the definition of the EIS system with more intact systems being considered more important. Furthermore, the reader is referred to the method presented in the report where the method very clearly states in table 6 that the results are classified in into four classes from very high to low and not the standard RHP classes. Lastly since the use is a non-consumptive use and as such will not lead to significant changes in the discharge of the system. While some short-term impacts on water quality may occur in the construction phase experience across South Africa as well as international research has shown that the impact from sealed surface roads on water quality is negligible.
7. See comment regarding the use of 'transformed' in Point 1 and response to comment in Point 7 above.
8. See response to comment 1 regarding the use of 'transformed'.
9. In the mitigation measures, the use of 'energy dissipating structures' at discharge points are recommended, are preferable to stilling basins which would lead to a far larger impact footprint and change in the characteristics of the receiving environment.
10. The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7.

The detailed comments and responses are included in Appendix A of this Report.

9. OPPORTUNITIES FOR FUTURE INVOLVEMENT IN THE ROAD K77 SCOPING & EIA PROCESS

Comment received on the Final Environmental Impact Report was included into the Final Environmental Impact Report which will now be submitted to the Competent Authority, The Gauteng Department of Agriculture and Rural Development (GDARD) for Environmental Authorisation.

Environmental Authorisation – PPP Phase 6

Whether Environmental Authorisation is granted or denied, the EAP will, within 12 days of the date of the CA decision, notify I&AP's of the decision and publish a notice, to which the I&AP may appeal.

10. CONCLUSION

The overarching aim of the PPP is not only to adhere to the required legislation, but also to give as many stakeholders as possible an opportunity to be actively involved in this process. SPOOR Environmental Services (Pty) Ltd. pro-actively identified and contacted the relevant I&APs as far as possible to inform them of the proposed development and relevant procedures, and providing opportunity to raise issues and concerns about the proposed development.

It is believed that I&APs were given sufficient opportunity to participate in the environmental process to date. I&APs that registered as a result of the advertisements and subsequent notices were logged on the registry (Appendix 9_10) and provided with additional information where this was requested. All of these responses (to and from the EAP) were included in the assessment to guide the studies to reach the most productive solutions for the proposed project. This documentation has been included in the Final Environmental Impact Report for which will now be submitted to the GDARD for evaluation purposes.

APPENDIX A

Comments and Responses Register

COMMENTS AND RESPONSES REGISTER

PROJECT NAME	THE PROPOSED DETAIL DESIGN AND CONSTRUCTION ROAD K77 BETWEEN ELIZABETH ROAD AND THE R550 (K154), MIDVAAL LOCAL MUNICIPALITY, GAUTENG				
<input type="checkbox"/>	PPP Phase 1 - Initial Notification Comments and Responses	<input type="checkbox"/>	PPP Phase 2 - Draft Scoping Review Comments and Responses	<input type="checkbox"/>	PPP Phase 3 - Final Scoping Review Period Comments and Responses
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	PPP Phase 4 - Draft EIA Review Comments and Responses
<input type="checkbox"/>					PPP Phase 5 - Final EIA Review Period Comments and Responses
Name	Organisation	Comments	Date	Response from Practitioner	Date
CLIENT					
Mr. Kumen Govender (Acting Director: Directorate Design)	Gauteng Provincial Department of Roads and Transport (GPDRT)				
PROJECT TEAM					
Mr. JC van Rooyen	SPOOR Environmental Services - EAP				
Mrs. Anneke le Roux	SPOOR Environmental Services - EAP				
Mr. Sudesh Singh	Knight Piésold Consulting (Pty) Ltd				
Mr. Jannie Viljoen	Knight Piésold Consulting (Pty) Ltd				
Mr. Wayne Hunt (Project Manager)	Knight Piésold Consulting (Pty) Ltd				
Mrs. Kim Venables	Knight Piésold Consulting (Pty) Ltd				
Mr. Stephan van Staden	SAS Environmental				
Mr. Udo Küsel	African Heritage Consultants				
Mrs. Hilda Bezuidenhout	Social Impact Assessment Practitioner				
John Hassell	Sound Engineer				
IMMEDIATE NEIGHBOURS AND ADJACENT LANDOWNERS					
Mr. Rui C. E. Graca	Blue Rose Development CC Portion 8 of the Farm Nooitgedacht 176-IR Portion 10 of the Farm Nooitgedacht 176-IR Portion 32 of the Farm Nooitgedacht 176-IR			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04

Name	Organisation	Comments	Date	Response from Practitioner	Date
Mr. Rui C. E. Graca	Die Botha Familie Trust - IT 61720/12 Remainder of the Farm Roodepoort 149-IR			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Rui C. E. Graca	CBR Development (Pty) Ltd Portion 16 of the Farm Nootgedacht 176-IR Portion 23 of the Farm Nootgedacht 176-IR			The EAP provided the I&AP with the background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Rui C. E. Graca	Blue Rose Development CC Portion 15 of the Farm Nootgedacht 176-IR			The EAP provided the I&AP with the background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Barend Kok	Sun Valley Wedding and Golf Venue Portion 4 of the Farm Roodepoort 149-IR			The EAP provided the I&AP with the background Information Document by hand	2015-01-14
		The I&AP returned the filled out I&AP registration form via email. The I&AP expressed his interest in the development due to his proximity and interest in the development of the area.	2015-02-04		
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15

Name	Organisation	Comments	Date	Response from Practitioner	Date
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Louis P. C. de Villiers	Portion 31 of the Farm Nooitgedacht 176-IR			The EAP provided the I&AP with the Background Information Document via Registered Post.	2015-01-17
		Mr. Louis de Villiers registered as an I&AP.	2015-01-24		
		The I&AP requested an enlarged map indicating the distance from his property (Portion 31 of Nooitgedacht 176-IR) to the road reserve of the planned road.	2015-01-24		
		The I&AP requires written confirmation that Portion 31 will not be affected during the construction of the development in the following matters (not including all possibilities): a) no construction vehicles will be allowed to be driven or parked on portion 31 b) no construction workers or staff will be allowed to enter portion 31 c) no dumping or storage of any material will be allowed on Portion 31 d) A proper fence need to be erected and maintained to separate the road reserve from Portion 31. e)The GPDRT needs to take total responsibility for any damage caused by the contractor or their employees to Portion 31 during the construction phase e.g. veld-fires, removal of waste, damage to buildings/trees/veldgrass etc.	2015-01-24	The EAP replied to the I&AP stating that his requests will be discussed with the design engineer and will revert back to him as soon as new information is available. These requests were subsequently taken up in the EMP mitigation measures.	2015-01-27
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
	Hans Rudolf Benecke Trust Portion 17 of the Farm Nooitgedacht 176-IR			The EAP provided the I&AP with the background Information Document via Registered Post.	2015-01-17
Mr. Michael Ruben Dare D. Dare	Plot 44 of Drumblade AH			The EAP provided the I&AP with the background Information Document by hand	2015-01-14
	Bonkie Family Trust Portion 1 of Plot 46 of Drumblade AH			The EAP provided the I&AP with the background Information Document by hand	2015-01-14
Ms. Tracey Keegan	Portion 1 of Plot 45 of Drumblade AH Remainder of Plot 45 of Drumblade AH			The EAP provided the I&AP with the background Information Document by hand	2015-01-14
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04

WARD COUNCILLORS

Cllr. Rob Jones	MMC Community services: Ward 5 Midvaal			The EAP provided the I&AP with the Background Information Document via email and encouraged the Cllr to circulate the document on his database.	2015-01-15
				The EAP enquired whether the BID has been circulated to people on his database	2015-01-19
		The Cllr. replied stating that he has circulated the BID on his list to the majority of Drumblade, Blue Saddle Ranched and residents in the surrounding areas.	2015-01-19		

Name	Organisation	Comments	Date	Response from Practitioner	Date
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		The Ward Cllr. forwarded the link in his newsletter to the residents in his Ward	2015-04-24	The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Cllr. IS Matsose	MMC Community services: Ward 12 Midvaal			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04

LOCAL AUTHORITY

Mr. Henry Human Secretary: Mrs. L. Chase	Midvaal Local Municipality Department Development and Planning (Executive Director) Division Environmental Management			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
		The I&AP stated that he forwarded the document to the relevant people and also included the contact details of the relevant people in the Road Division	2015-01-23	The EAP requested the contact details for the relevant person in the Engineering Services Department, Division Roads.	2015-01-22
				The EAP invited the I&AP to comment on the Draft Scoping Report, forwarded a Dropbox link via email and delivered a hard copy and CD to his office.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Mr. Stephanus Coetzee Secretary: Mrs. E. Viljoen	Midvaal Local Municipality Department Engineering Services (Executive Director) Division Roads			The EAP provided the I&AP with the Background Information Document via email.	2015-01-23
				The EAP invited the I&AP to comment on the Draft Scoping Report, forwarded a Dropbox link via email and delivered a CD to his office.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A CD copy was delivered to the I&AP for review.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17

Name	Organisation	Comments	Date	Response from Practitioner	Date
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Mr. Bruce Welchman	Midvaal Local Municipality Department Engineering Services			The EAP provided the I&AP with the Background Information Document via email.	2015-01-23
				The EAP invited the I&AP to comment on the Draft Scoping Report, forwarded a Dropbox link via email and delivered a CD to his office.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A CD copy was delivered to the I&AP for review.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Mr. Eugene Lensley Secretary: Mrs B. Guca	Midvaal Local Municipality Department Protection Services (Executive Director)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery. A CD copy was also delivered to the I&AP for review.	2016-08-04
Mr. Corne Heymans	Division Fire and Emergency Services Operations and Communications (Divisional Officer)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Mr. Nkateko Mashele	Midvaal Local Municipality Department Engineering Services Civil Engineering Services (Director)				
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A CD copy was delivered to the I&AP for review.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04

Name	Organisation	Comments	Date	Response from Practitioner	Date
Mr. Ritshidze (Ritshi) Maswime	Midvaal Local Municipality Department Engineering Services Division Roads (Assistant Director)				
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A CD copy was delivered to the I&AP for review.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Ms. Anna Mpai	Midvaal Local Municipality Department Protection Services Division Traffic (Traffic Chief)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery . A CD copy was also delivered to the I&AP for review.	2016-08-04
Station Manager	Midvaal Local Municipality SAPS Kliprivier: Station Manager			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Station Manager	Midvaal Local Municipality SAPS De Deur: Station Manager			The EAP provided the I&AP with the background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
GOVERNMENT DEPARTMENTS					
Mr. Lesida Mabona Environmentalist	Department of Water & Sanitation Section: Upper Vaal Water Management Area (C22D Quaternary Drainage Region)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15

Name	Organisation	Comments	Date	Response from Practitioner	Date
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email. A hard copy and CD was also delivered to DWS for review.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard- and CD copy was delivered to the I&AP for review	2016-08-04
Mr. Andre Kilian	Gauteng Department of Roads and Transport			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment.	2016-08-04
Mr. Grant Botha	Provincial Heritage Resources Agency Gauteng (PHRAG)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment.	2016-08-04
Julia Kganaga	Gauteng Department of Community Safety				
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment.	2016-08-04
Mr. Andrew Solomon	South African Heritage Resources Agency			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment.	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment.	2016-08-04

OTHER NGOs, CBOs, CONSERVANCIES, RESIDENTS ASSOCIATIONS, SERVICE PROVIDERS ETC.

Mr. Andrew Barker (Chairman: Executive Committee)	KlipSA (Klipsrivierberg Sustainability Association)			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
		The Chairman of KlipSA requested to be included in the I&AP register	2015-02-17		

Name	Organisation	Comments	Date	Response from Practitioner	Date
		KlipSA discussed their concerns about the establishment of a six lane facility and requested an opportunity to discuss and understand the regional network and the motivation for this facility and particular link road to be established at this stage in view of the current and apparent lack of development in the area. It was also mentioned that the possibility of rather upgrading existing roads (to avoid construction of a new road) should be explored further.	2015-02-17	The EAP explained that SPOOR was appointed for the section of road K77 between Elizabeth Road and the K154 or R550. It was understood from the design engineer that the section of K77 under the SPOOR application will be connected to alignments to the north and the south of that in our application to serve future development in the area. In addition although the application is for six lanes within a 62 meter reserve, only a two lane dual carriageway will be constructed at present. The EAP continued to explain that the rest of the lanes will follow as the demand for this is realized. The EAP indicated that he will however put Mr. Barker in contact with the design engineers in terms of your request to understand the planned road network for the larger area.	2015-02-17
		The I&AP stated that it appears that the road cuts through farm land and requested whether there is no alternative alignment which can be considered.	2015-02-17	The EAP explained that SPOOR understood that a number of other alignments were considered for this section of the K77 but that this clashed with existing development proposals for the area. The existing route was presented as the one developed over a space of the last two years and one that fits into the Gauteng Provincial Department of Roads and Transport's road planning as well as that of the Midvaal Municipality and private property developers.	2015-02-17
		A major concern to the I&AP was the protection of pathways and movement corridors for species, but suggested that it can be as simple as ensuring that there are conditions for eco under or over passes to accommodate safe movement for species.	2015-02-17	The EAP replied that a Biodiversity Specialist was appointed that will perform Biodiversity assessments as part of the EIA process. The I&AP's comment will be brought under the Specialist's attention and request them to provide comment on your proposal.	2015-02-17
		The Chairman suggested that it is well worth conserving or keeping the general area as a continuous ecological unit as there is an abundance of wildlife visible even during the day. He was also of the opinion that the road infrastructure created a linear corridor of disturbance and distribution of alien invasive species. A point in case was the pom-pom weed that is gradually dispersing along all the major roadways in Joburg and from there invading natural veld. The increased traffic and human presence is suspected to be a definite barrier to animal movement and will impact local wildlife populations. It is therefore our contention that it would be better to upgrade existing roads, which will have a similar effect on traffic movement in the area.	2015-02-17	The EAP took note and will be sure to assess this as part of the EIA and will also forward I&AP's view to the design engineers for their consideration.	2015-02-17
		The Chairman would like the opportunity to discuss the general road network with the design engineers to understand what is planned and to look at the context of the future roads in terms of the proposed future development initiatives.	2015-03-31		
		The I&AP requested what further stakeholder engagements are planned with respect to this proposed road design and construction.	2015-02-17	The EAP stated that the project is in the initial stages and SPOOR will keep him updated on all the opportunities for participation.	2015-02-17
		The I&AP raised concerns that there is evidence in the vicinity of the proposed road of Khoisan settlements which were identified in a previous environmental investigation for a residential development to the north of the Sun Valley road.	2015-02-19	The EAP informed the I&AP that he will inform the heritage consultant of the comment for further investigation in his HIA.	2015-02-19
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
				The Heritage consultant replied that San (Bushman) remains are found all over the country. In Archaeology it is referred to as Late Stone Age remains. This material is only important if it is found in context where it can be dated. Such a place would normally be in a rock shelter. If the material is found out of context it is of no real scientific value. Normally Late Stone Age material is found on ridges in the Highveld where the people had been spending time to look for something to hunt. It is thus the opinion of the consultant that no important Late Stone Age sites are near the proposed route of the new K77 road.	2015-03-19
		Mr. Barker commented that the response from the specialist appeared to be a general observation and requested that a more serious approach should be taken particularly as a report undertaken by Prof TN Huffman in July 2009 identified two sites with ruins associated with Khoisan settlement to the north of the R550.	2015-03-31	The EAP assured the I&AP that his comments regarding wetland and heritage issues would be forwarded to the respective specialists for their comment and that the EAP would revert back to him as soon as their comment became available. These issues would also be addressed in the Draft and Final EIA Reports.	2015-04-01

Name	Organisation	Comments	Date	Response from Practitioner	Date
		<p>The Chairman stated that the road development will facilitate channelled storm water inflow into the wetland, rather than diffuse flow as would occur if the road was not built. The wetland in the area displays signs of being a low energy system, so channelled storm water entering the system may result in channel incision. In his opinion consideration should therefore be given to preventing this as they believe that could be achieved in several ways and would like to see what the specialist recommends.</p>			
		<p>Mr Barker further explained that with regards to the wetland delineation, there is the one obvious wetland crossing, and what appears to be another not-so-obvious wetland crossing. It would be interesting to see what areas the wetland specialist focuses on. In this regard, we would recommend that the wetland specialist indicate, on a map within their report, their auger points so that we can determine that the full extent of the road has been taken into consideration in the delineation process.</p>			
		<p>Of particular concern, the report indicates that a water use licence has already been submitted to DWS for the project, yet they indicate that a wetland delineation will still be done for the project. If the water use licence was indeed submitted, a wetland delineation should already have been done, along with the determination of Present Ecological State (using either Wet-Health or Wet-IHI), the determination of the ecosystem services (using Wet-Ecoservices) and the determination of the Ecological Importance and Sensitivity of the wetland, as part of the application process. Therefore, we would recommend querying the suitability of the WULA application prior to the wetland delineation. If a wetland assessment has already been done, please make it available for review.</p>		<p>The EAP responded in the matter of the WULA that it was an error on our behalf as the WULA has not yet been submitted to DWS as we have not yet received the wetland report and final road design details to make the submission. The WULA would only be submitted post the EIA phase Specialist Studies.</p>	
		<p>KlipSA believe that DWS will require all wetlands within a 500m radius to be delineated and the risks associated with the proposed road construction to be determined for those wetlands (under GN1199). This will all have to be done by the wetland specialist, and will provide further details on whether additional water use licence applications will need to be applied for other than those for just the crossing. Clarity in this regard is required.</p>			
		<p>Consideration must be given to the fact that the purpose of the road is to facilitate development within the larger area. The additional development will essentially constitute a cumulative impact on the wetland and associated wildlife within the area. Therefore, the EAP must consider this cumulative assessment during the EIA phase. It is of critical importance that the context is taking into consideration and not only consider the road footprint but also the resultant surrounding development impacts. This will have implications with regards to the mitigation measures that are proposed by the various specialists, i.e. if the road is to be constructed to facilitate development in the area, the purpose and effectiveness of things like wildlife bridges will be questionable. Further, it will be pointless for the EAP to proposed things like gabion structures for the purpose of the road crossing, if the area becomes developed, and the urban runoff will result in the structures failing in the near future.</p>			
		<p>The Chairman stated that the most significant omission from the report (and an issue generally ignored in EIA's) is habitat fragmentation. KlipSA suggests this should form part of the evaluated assessment of impacts together with the other components evaluated, such as vegetation, fauna etc. etc. There is no doubt that this road, if approved, will bisect one of the most important large open space areas in Walkersville. It will impact the movement of species, and hence survival of many of the extant species, not only locally but regionally. Habitat fragmentation is sadly neglected in most EIA reports and yet it is possibly one of the most important regional impacts influencing the long term environmental sustainability of the remaining open spaces. It is a problem not only in SA, but internationally. The quote below is from a book by Davide Geneletti called 'Ecological evaluation for environmental impact assessment': "The weakness of the analysis of ecological impacts, such as the loss and the fragmentation of natural ecosystems, limits the influence of these issues on the decision-making process. Ecological consequences are bound to play a minor role in the authorisation of a development because their relevance is not sufficiently stressed and justified in the EIS"</p>			

Name	Organisation	Comments	Date	Response from Practitioner	Date
				The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		Mr Barker confirmed that they had received the Final Scoping Report but did not have time to review it as a result of other urgent matters.			
				The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		Mr Barker or behalf of KlipSA made the following comment. Our apologies for a late submission. Unfortunately, we had a technical glitch with e-mails between members of my Sustainable Development Team and myself and I have only received the following comments this morning. I hope that you will still accept our submission.	2016-07-19	The EAP Responded in that the KLIPSA response would be sent to the Biodiversity Specialist and that a response would be sent in reply in due course.	2016-07-19
				The EAP forwarded the KLIPSA response to the Biodiversity Specialist and received the following reply: The study focused on sensitive habitat and the conservation thereof, which would, in turn, conserve sensitive faunal and floral species which utilize such habitat. It is acknowledged that certain species, especially wider ranging faunal species such as birds and mammals, may utilize transformed/disturbed habitat on the margins of such sensitive areas for foraging and migration, but the fact remains that they primarily depend on their preferred habitat for breeding and habitation. Thus, it is the professional opinion of the authors of the report that by ensuring continued existence of sensitive habitat as recommended in the report, associated sensitive species will be conserved.	2016-07-28
		Habitat unit 2 is indicated to be "transformed", the reasoning given was indicated to be residential development, roads and disturbed veld. It should be noted that 'disturbed' does not correlate with 'transformed'. Transformed would indicate a complete loss of ecosystem function, whereas 'disturbed' indicates ecosystem functioning still present. This is especially relevant when considering the Critical Biodiversity Area designation of the study area (vegetation that is disturbed can still fulfil a function that will support fauna of conservation concern, so can still be classified as a CBA);		The majority of the vegetation associated with the study area, although classified as a CBA, has been previously cultivated as confirmed by aerial map analysis (presence of cultivation lines) and on-site evidence as mentioned in the report. Therefore, the description of 'transformed' vegetation best described the state of vegetation at the time of assessment. Notwithstanding, the mitigation measures as set out in the report are deemed sufficient to still support the CBA classification of the surrounding environment and to protect sensitive habitat as encountered on-site. The EAP Added that to clarify, in terms of the reasoning in the Draft EIAR for the "transformed" nature of the habitat previous low residential areas (agricultural plots) were referred to and not residential development i.e. township area or the like.	
		No indication as to when the fieldwork was conducted is provided within the report, although the report is dated July 2015. It is therefore assumed that fieldwork was not undertaken within the prescribed survey period of GDARD for botanical surveys. Give the CBA designation for the study area and the reasoning therefore (including orange listed flora and primary vegetation), a detailed ecological study within the flowering period of the relevant floral elements is required to inform the study;		The assessment was performed in November 2014 (Refer to Section 2.1 on Page 6 of the report), thus falling within the growing season (summer) and complying to the GDARD minimum requirements.	
		The report indicates that suitable habitat exists for Tyto capensis (Grass Owl), for which the CBA was designated. Therefore, CBA designation is supported (not mentioned in report). Further, Secretary Birds are often observed within the study area (personal observation), further supporting CBA designation, yet this species is not elaborated on. Mitigation measures should further speak to these aspects and flight/hunting patterns of the species in question, especially given the potential for road collisions at particular times of the day.		No Sagittarius serpentarius (Secretary bird) nor T. capensis were recorded during the survey and their respective reporting rates for the Pentad (SABAP) are very low. However as suitable habitat was found within and surrounding the wetland areas, the possibility that these species may occur was recognized. It is further stated in the report that should this species be present, the conservation of the wetland and surrounding buffer zone will ensure that their preferred habitat is protected. Furthermore, speed limit and signage recommendations are given in Section 9 of the report, with specific mention of T. capensis. However, the speed limit recommendation will also be advantageous for S. serpentarius.	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		No consideration for bird species of conservation concern is given in Section 6.7		Consideration the avifaunal species of conservation concern is presented in Section 6.2 as they have been recorded in the pentad (SABAP). Although species such as <i>S. serpentarius</i> and <i>T. capensis</i> have been recorded within the pentad, the reporting rate for these species is very low. This was taken into consideration during the probability of occurrence calculations for faunal species of conservation concern, which takes into account species distribution, habitat availability, habitat transformation levels and food availability. As no avifaunal species obtained a score of higher than 60% of occurring within the study area, they were not discussed. Instead, species which may actually occur within the study area and which may be affected by the proposed development were focused on. However, as stated, the primary recommendation was that the rocky ridge and wetland and associated buffer be preserved and in turn, habitat for species such as <i>T. capensis</i> will be conserved.	
		Figure 16 indicates extent of wetland features relative to soil auger points. Based on Figure 16, it can be deduced that only three (3) holes were augured in the investigation of wetland characteristics, none of which correlate with wetland features identified. It can therefore be concluded that confidence and accuracy of extent of the wetland features associated with proposed road is questionable. A more detailed wetland assessment is therefore required by a suitably qualified wetland specialist.		It is unclear why only two auger points show on the map, when in fact several auger holes were sampled to determine the temporary zone boundary. It was determined that the correct data set was not used in the preparation of the map. However, the report has been amended and replaced with a map showing all the auger holes. The map has also been included in this correspondence for your convenience.	
		Given the above identified issues within the ecological component of the study (CBA designation, timing of survey, species of conservation importance, etc.), it is unclear as to how the specialist regards the wetland as being of low biodiversity importance (section 7.3). A similar comment can be made for values obtained in Ecological Importance and Sensitivity assessment.		The biodiversity maintenance component takes several (12 in total) aspects into account. Thus, various other factors, such as alien invasive vegetation and general habitat degradation also contribute to a lowered biodiversity maintenance component score. The Ecological Importance and Sensitivity methodology etc. is discussed in Point 7 below.	
		Method used for determination of Ecological Importance and Sensitivity is not based on current approach of Department of Water and Sanitation, but rather a modification of an old approach that does not consider regional context or conservation status of regional wetland vegetation type.		SAS is aware of the current (2013) methodology and the author of the method was contacted to provide the methodology, however, to date, no response is forthcoming. The method was however obtained from the WRC after submission of the specialist report to the EAP. The 2009 methodology which was used considers the same components as the 2013 methodology (ecological and socio-cultural services, PES etc.), along with regional wetland and vegetation conservation status (according to the FEPA database) as indicated in the report. Thus, the authors are confident that using the 2013 methodology would have yielded similar, if not identical, results as contained in the report and in no way materially affect the decision making process.	
		Means of interpreting Ecological Importance and Sensitivity of the identified wetland based on present ecological state classes is incorrect.		The method employed (refer to Section 2.4 of the report for methodology) allows for a certain degree of interpretation and a PES:EIS score of 1 rather than 2 was deemed to more accurately reflect the conditions during the time of assessment as significant transformation (such as agricultural activities) has occurred in the catchment. Even if the prescribed score of 2 was allocated, due to the robust nature of the method, the final EIS score would still fall within Class C.	
		According to Section 8.2, vegetation indicator was used as an indicator of wetland conditions, yet soil indicators were not. According to the wetland delineation guideline (DWA, 2005), the use of the vegetation indicator requires undisturbed conditions, which are not present according to the specialist, therefore further supporting the conclusion that the wetland delineation is inaccurate		As discussed above, several auger holes were sampled in order to aid in the determination of the wetland temporary zone boundary. This can be clarified in the report as per Point 5 above. Furthermore, the vegetation indicator and terrain units were also utilized as set out in the report. The authors are confident that the wetland delineation is accurate and complies with the Department of Water Affairs (DWA) 2005 method. The EAP added that despite the above please also note that the proposed alignment was moved from a position where it would have crossed a broader less transformed section of wetland upstream to a proposed position where it crosses the wetland feature at an existing dirt road crossing over this wetland and drainage line	

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		Although recommendations regarding wetlands are provided, these are minimal and do not consider mitigation of possible head cut or gully erosion as a function of culvert/bridge design and installation		<p>The reader is referred to Section 9.2 of the report where various measures regarding bridge/culvert design and general erosion control, among various other aspects such as rehabilitation, sediment control and a whole host of possible mitigation measures are discussed. This early in the process, detailed bridge designs are not always available, and therefore the mitigation measures are designed to cover a wide variety of scenarios.</p> <p>The EAP added that detailed recommendations in terms of possible head cut or gully erosion were further developed in the Stormwater Management Guideline Document Included as Appendix 4 in the Draft EMPr.</p>	
		The inclusion of terrestrial underpasses adjacent to the wetland is poorly considered and detailed. GDARD minimum requirements provide greater detail than that provided in specialist report, yet are not provided		According to the GDARD Minimum Requirements, detailed underpass designs are necessary when habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species is traversed. As no sensitive/RDL faunal species which may make use of such underpasses were recorded or are likely to occur within the study area, this component was not elaborated upon, and instead threats such as alien floral invasion and erosion (which are significant problems within the area currently), were addressed.	
		<p>In consideration of the above comments, the specialist terrestrial scan and wetland impact report as developed for the proposed study does not represent an accurate reflection of the associated sensitivities present. As such, the following is required to better inform the application:</p> <p>a. given the CBA designations associated with the proposed activity, a detailed ecological assessment is required within the flowering period of the species associated with the CBA designation in order to confirm/exclude the occurrence and population size of the relevant species;</p> <p>b. further studies regarding potential road impact of bird species of conservation concern should be evaluated;</p> <p>c. a more detailed wetland delineation assessment using all available wetland indicators and EIS assessment including results obtained from the detailed ecological assessment is required to inform the application;</p> <p>d. based on the results obtained during revised studies, impacts will need to be re-assessed and more suitable mitigation and rehabilitation measures recommended.</p>		These aspects were covered in the responses from the Specialist above.	
			2016-08-26	The I&AP received a Dropbox link to the Final EIA Report and was invited to comment.	2016-08-04
		Mr Barker or behalf of KlipSA made the following comments.	2016-08-26	The EAP sent the KlipSA comment to the Biodiversity Specialist and awaited the response. The KlipSA comment was also forwarded to Mrs Collison of the EWT as requested by Mr Barker. A response was sent to Mr Barker on assimilation of all the information. The EAP furthermore thanked the KlipSA for their participation in the process.	2016-11-10
		We are still concerned about the design and construction of this portion of the K 77 and note that we have not been given an opportunity to discuss the wider network of roads in the area which are based on needs and requirements established in the 1970s. We understand that these roads have been incorporated into later thinking and planning but we question whether the need and desirability of this extensive road network through the area impacting on environmentally sensitive areas outside the urban development boundary has been carefully and properly reviewed.	2016-08-26	We note your concern. Unfortunately we can only comment on the section of road that we were appointed for and not the wider network. We understand from the Gauteng Provincial Department of Roads and Transport (GPDRT) that several studies were conducted in terms of the requirement of the network and also in conjunction with the local municipalities. We believe that the relevant authority to contact in this regard would be the GPDRT. The contact detail of Mr K Govender of the GPDRT is included under the Applicant detail of the EIAR and we understand that he is the project manager of the planned K77 network. Mr SS Short is also very knowledgeable with regard to the K77 and other roads in the Midvaal area. His detail is included in Appendix 9_10 of the EIAR and has also been attached to this correspondence for your convenience.	2016-11-10
		We note that SS Short makes mention of a "compilation of various roads planning initiatives in the area" in his e-mail dated 17 June 2016. We would be grateful if you could forward us a copy of that document.		The document received from Mr Short is attached to this email as requested.	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		In our earlier communications you said that you would put us into contact with your design engineers. This has not happened.		We apologize for not putting you in direct contact with the Engineers. Their contact detail was included in the EIA process from the time of the distribution of the Draft Scoping Report and we viewed this as sufficient for the KlipSA to be able to contact them. However as per your request their detail is included below: Knight Piésold Consulting: Mr W Hunt (whunt@knightpiesold.com) or Mr S Singh (ssingh@knightpiesold.com) 011 806 7111. Mr Singh is currently the Project Manager and would be the party with the best background knowledge regarding the entire K77 route.	
		In our submissions we raise concerns regarding cutting through an ecological unit and the need to consider appropriate road crossing measures for fauna. We have not been able to find any further reference or discussion in the report regarding the provision of appropriate crossings.		See Point section below.	
		In this regard, in addition to the comments below, we refer you to Ms Wendy Collinson of the Endangered Wildlife Trust's Wildlife and Roads Project to provide you with professional guidance and advice as to what appropriate measures could be implemented.		We contacted Mrs Collison and discussed the the proposed road, the EIA to date and also forwarded a copy of the KlipSA concerns included in the draft and final EIA comment stages. We also forwarded the Final EIA to her which she was kind enough to review. She subsequently provided us with the new EWT document titled: Guidelines to mitigation methods to address wildlife road conflict in South Africa. She also directed us to where we can include these guidelines and the EIAR and the EMPr was updated with these guidelines.	
		We question whether adequate attention has been given to the evaluation and assessment of the different components of the mitigation hierarchy in terms of the responses to our concerns particularly with regards to the ecological and biodiversity impacts.		Noted.	
		We are concerned that the heritage consultant is of the opinion that there are no important Late Stone Age sites near the proposed route especially as noteworthy sites have been found and located in the vicinity of the K 77 to the North of the K154.		See section below.	
		We would request that Chief Adam Mathysen and Ralph Goliath of the Jackson's Drift Khoisan Development Association be consulted regarding the existence of possible sites in the area known to the community.		We reviewed the study of Professor T.N. Huffman as per your earlier requests and also obtained the GPS detail of points of possible archaeological materials in the area of the proposed road. We also submitted this to our Heritage Specialist for review. He verified that no materials were found in the area of the proposed alignment. We also contacted Chief Mathysen and Mr Goliath for their inputs. They are also included in this email. We also amended the project EMPr to include the archaeological sensitivities of the area.	
		We would request that special measures be put in place for careful examination of all excavations for the construction of the road to ensure that no sites are found or disturbed.		Included in the amended EMPr.	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		<p>We were not able to find any further consideration regarding the additional development and cumulative impacts on the wetland and associated wildlife which we believe would result from the development of this route. Through the report it is as mentioned that extensive township development processes and applications have already resulted and we believe that the cumulative assessment of the developments in this area needs to be further examined with reference to the broader road network of which this is a component.</p>		<p>We note your comment in terms of cumulative impacts on the wetland and the associated wildlife in terms of the additional developments and the larger road network in the area. Although we cannot include detail mitigation measures in terms of the impacts of the broader road network or the additional developments of the area, our approach to the development of the mitigation measures of this section of road was to look at aspects such as loss of sensitive habitat units, habitat fragmentation, sensitive species and storm water management and to develop the mitigation measures to counter these impacts. We believe that should the GPDRT and the GDARD ensure the implementation of the K77 local scale (Elizabeth to K154) mitigation measures but on the broader route scale, that the cumulative impacts would be addressed. In addition we further believe that the GDARD, in light of the fact that they are the relevant authority and also have the detail of all of the impact assessments and the identified impacts of the proposed developments of this area should assess the identified mitigation measures and make recommendations where required. The relevant impacts assessments should also be distributed to the KlipSA for your inputs.</p>	
		<p>In a similar vein, the impacts on local and regional habitat fragmentation of this component nor of the larger road network has not been addressed as far as we could establish.</p>		<p>See comment above. Furthermore, we believe the loss of connectivity as a result of this section of the road has been investigated and mitigation measures developed to reduce the impact. The EIAR will also be updated with the KlipSA recommendations and that of Mrs Collison.</p>	
		<p>With regard to the various biodiversity issues which we have raised in previous e-mails, I have provided responses to the comments of your biodiversity specialist (provided in green) below. These comments are noted below.</p>		<p>See the response of the Biodiversity Specialist Below.</p>	
		<p>We trust that these comments and submissions will be considered, addressed and incorporated into the final documentation.</p>		<p>As per the previous instances your contributions will most definitely be included.</p>	
				<p>Responses from the Biodiversity Specialist.</p>	<p>2016-09-13</p>
		<p>According to SANBI, the term “transformed” should be avoided as transformation is a widely held positive socio-economic goal in South Africa, so it creates confusion if the biodiversity sector uses it to describe something negative or undesirable. Further, “Irreversibly modified” is an ecological condition class in which the ecosystem has been modified completely, with an almost complete loss of composition and structure, and where all or most ecosystem function has been destroyed and the changes are irreversible. However, this is not the case in the present instance, as previously cultivated land still has function in supporting faunal species of conservation concern (e.g Secretary Birds have a preference for disturbed grasslands and historic agricultural land), and depending on the date since last cultivation, could have resorted to at least secondary grassland. This is recognised in the Gauteng C-Plan as well as the various bioregional plans, which allows for agricultural landscapes to be classified as Critical Biodiversity Features on the basis of supporting habitat favoured by species of conservation concern such as Secretary Birds, Grass Owls, etc.</p>		<p>The description of the habitat type was amended to ‘Modified Grassland’ and the possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7. of the Specialist Report. Further mitigation measures to address the possible presence of these species were added.</p>	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		Recording rates are expected to be low for species of conservation concern, hence their designation of conservation concern. Much of the specialist's response centres in the wetland habitat. However, Secretary Birds have a preference for disturbed/previously cultivated land, as is present within the terrestrial areas surrounding the wetland and buffer. Therefore, protection of the wetland and buffer alone is unlikely to ensure the preferred habitat will be protected. It is further noted that the speed limit as recommended by the specialist in the report (a speed limit of 80km/hour; Section 9.3) is in contradiction with that of GDARD minimum requirements which specifies the following: "Where roads are associated with suitable habitat for Grass Owls, road signs warning motorists to slow down on account of Grass Owls should be erected (in accordance with applicable legislation) and road margins should be regularly mowed to a distance of 5m from the hard edge of the road and/or regularly burned to prevent the accumulation of grass cover that could provide refuge for small mammals. In addition, a maximum speed limit of 60km/h should be enforced through the introduction of speed traps, rumble strips and speed bumps. Where a road-related mortality problem is encountered with other priority species, similar measures may be required"		The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7.	
		See comment above regarding low reporting rates as well as limiting the protection of habitat to wetland and rocky ridges. Secretary birds have been confirmed to be present on site as well as within surrounding areas, and as such scoring should be 100% probability of occurring within the study area, and accordingly should be focused on.		The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7.	
		It is of concern that the specialist is unclear as to why the incorrect map was included within the report, especially given that the report is indicated to have already been internally reviewed (see front page of report). It could therefore be concluded that the specialist's own internal quality control process is severely lacking.		SAS apologises for the wrong map insertion. However, it was a bona fide oversight and in no way does it detract from the accuracy of the mapping of sensitive features (including wetlands) in the report.	
		The specialist should note that the document has been publicly available for some time through the WRC. As specialist consultants, it is the responsibility of the specialists to keep abreast of the latest methodology regarding their field of study.		Noted and SAS were aware of it, however bona fide attempts were made to obtain it. Through diligence, it was eventually obtained and is now implemented in all specialist wetland reports.	
		Ecological sensitivity (or fragility) refers to the system's ability to resist disturbance and its capability to recover from disturbance once it has occurred (resilience), which includes sensitivity to changes in floods, low flows/dry seasons, and water quality. These aspects are not considered within the specialist's determination of Ecological Importance and Sensitivity (only ecological importance components used, but nothing on components relating to ecological sensitivity), therefore invalidating the specialist's/EAP's claim that the 1999 (note: not 2009 as indicated by EAP) methodology which was used considers the same components as the 2013 methodology (it should be further emphasised that the specialist did not use than 1999 version of EIS determination, but rather an adaptation of the 1999 approach developed by the specialist that has not been peer reviewed). The Ecological Importance and Sensitivity of a wetland has nothing to do with Present Ecological State or Ecological Integrity, and as such this should not be considered in the Ecological Importance and Sensitivity determination. It is further incorrect to assign a PES category (i.e. Category A-F) for determination of Ecological Importance and Sensitivity, as these categories relate to the ecological condition of the watercourse in accordance with the Water Resource Classification System.		The comment is noted however the concern is not warranted and furthermore is unfounded. The only adaptation made (in some instances) by SAS is that the PES is not obtained from WET Health but from the Wetland IHI method (which was developed by DWS and is well recognised) and which still provides a PES score to fit into the model. This is a negligible variation in the method published since it only requires the input of a PES score from an acknowledged tool for doing so. Furthermore since the published method acknowledges that the PES of the system has an integral and fundamental part to play in the definition of the EIS system with more intact systems being considered more important. Furthermore the reader is referred to the method presented in the report where the method very clearly states in table 6 that the results are classified in into four classes from very high to low and not the standard RHP classes. Lastly since the use is a non-consumptive use and as such will not lead to significant changes in the discharge of the system. While some short term impacts on water quality may occur in the construction phase experience across South Africa as well as international research has shown that the impact from sealed surface roads on water quality is negligible.	
		It is questionable whether the method used can be regarded as "robust", as the method has not been peer reviewed or accepted within the wider wetland society. See further comment above that provides additional supporting evidence in this regard, as well as previous comment regarding concern with the use of "transformation".		See comment regarding the use of 'transformed' above.	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		Noted. The specialist and the EAP are both requested to re-consider using “transformed” with regards to wetlands and habitat, as per previous comments.		See response to comment 1 regarding the use of ‘transformed’.	
		Noted. Specialist should also consider the use of stilling basins in the design of wetland mitigations measures.		In the mitigation measures, the use of ‘energy dissipating structures’ at discharge points are recommended, are preferable to stilling basins which would lead to a far larger impact footprint and change in the characteristics of the receiving environment.	
		According to the GDARD requirements “Suitable terrestrial underpasses should be provided to facilitate safe movement of animals, specifically where roads/railways traverse provincially important species/climate change corridors or ridges or habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species.” This does not imply that terrestrial underpasses are only exclusively necessary where habitat suitable for any Red/Orange List amphibian/ reptile/ mammal species is traversed, but rather are required where such linear structures would otherwise fragment habitat, especially considering that watercourses and wetlands are preferred movement corridors for various other terrestrial species, regardless whether these species are of conservation importance or not.		The relevant additional mitigation measures were included in the report in order to allow for the possible presence of these species. See Sections 9.3 and 10. The possible presence of Secretary Birds and Grass Owls was also elaborated upon in Sections 6.2 and 6.7 of the Specialist report.	
				The EAP thanked Mr Barker for their input and assured him that the responses would be included in the final EIA.	
Ms. Elaine Potgieter (Chairman)	Drumblade Conservancy			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Ivan Parkes	Chairman Thorntree Conservancy Chairman Gauteng Conservancy and Stewardship Association Liaison (IUCN) National Association of Conservancies Stewardship of South Africa	Mr. Parkes requested a BID and to be registered on the I&AP database.	2015-02-17	The EAP forwarded the BID and registered Mr. Parkes as an I&AP.	2015-02-17
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Wayleaves: Johannesburg	Eskom: Wayleaves Johannesburg			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
		Mr. Louw forwarded the BID to the Johannesburg Wayleaves Department	2015-01-15		

Name	Organisation	Comments	Date	Response from Practitioner	Date
		Clarissa Letsoalo of the Land and Rights Division requested Vuyo Nyamane to revert back to the EAP.	2015-01-20		
		Vuyo Nyamane of the Land Development Department, Land and Right Section, informed the EAP that no Eskom Distribution or Reticulation Services are affected by the Development and thus had no objection to the Development. It was noted that if construction was under or in close proximity to a Eskom line, that Mr. Abie Schoeman be notified at least 7 days before construction commences.	2015-01-22	The EAP acknowledged receipt of the letter and forwarded the information to the Project Manager	2015-02-17
Ms. Yvonne Oosthuizen Mr. Mlu Mchunu Gauteng Wayleaves	Telkom: North Eastern Region			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
		Gauteng Wayleaves replied with the wayleave application requirements.	2015-01-17	The EAP forwarded the information to the Project Manager	2015-02-17
Mr. Quinton Swart Ms. Leona Coetzee	SASOL: Retail operations			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Ms. Natalie Koneight Mrs. Gail Andrews (Manager)	Rand Water: Environmental Assessments			The EAP provided the I&AP with the Background Information Document via email.	2015-01-15
		Ms. Lindiwe Gamede stated that Rand Water is not affected by the development.	2015-01-16	The EAP forwarded the information to the Project Manager	2015-02-17
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
OTHER INTERESTED PARTIES					
Klipriver Business Park Management Lynn Duncan	Klipriver Business Park			The EAP provided the I&AP with the Background Information Document via email.	2015-01-16
				The EAP requested contact information for the Heineken Sedibeng Brewery.	2015-01-22
		The I&AP replied that she was still busy resourcing the information.	2015-01-22		
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15

Name	Organisation	Comments	Date	Response from Practitioner	Date
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Meryl	Klip River Community Church			The EAP provided the I&AP with the Background Information Document via email.	2015-01-16
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Maria da Silva	Drumblade Community Watch			The EAP provided the I&AP with the Background Information Document via email.	2015-01-16
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Ms. Yvette Swanepoel H J Kok (registered owner)	Portion 5 of the Farm Roodepoort 149-IR			The EAP provided the I&AP with the Background Information Document via email.	2015-01-16
		The I&AP requested to be registered as an Interested and Affected Party to gain more insight on how the road will affect their property.	2015-01-19	The EAP asked the I&AP to fill in the registration form attached to the BID to complete the registration process.	2015-01-19
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Mostert	Drumblade A.H.	1. The I&AP stated that he wishes to be registered as an I&AP and asked a few questions:	2015-01-16	1. The EAP registered the I&AP on the I&AP database. The EAP enquired for interest sake where the I&AP got the Background Information Document.	2015-01-16

Name	Organisation	Comments	Date	Response from Practitioner	Date
		1.a. The I&AP requested an explanation of what the 'PWV 18" is		1.a. The EAP apologised if the map was unclear and explained that the PWV 18 has been included on the map to give better context to the future scenario in the area and does not form part of the K77 application to GDARD. The proposed PWV 18 Road forms part of the future Gauteng Roads Master Plan. The EAP stated that he has no knowledge to when the road will be constructed or what class road it will be and suggested that the Traffic Impact Assessment might shed some light on the matter.	
		1.b. The I&AP asked why the road has been designed as a 6 lane road as to him it seems redundant.		The EAP stated that the road has been designed to its maximum capacity, but will be constructed in phases to satisfy the current traffic demand. Phase one will only require the construction of two lanes, one in each direction. As the demand increases in the future, the road width will increase accordingly.	
		1.c. The I&AP enquired whether the K77 road will be built after the tarring of the R550.		The construction timeline for the K77 is not yet known to us as the EIA process leads the process and can influence the anticipated construction timeline a great deal. We will inform you if new information becomes available to us.	
		1.d The I&AP expresses his concern regarding the influx of labourers to the area.			
		2. The I&AP replied that the he received the BID from the Drumblade Community Watch group. He also mentioned that the map was good enough but was not sure what the acronym 'PWV' stood for.	2015-01-19		
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Hannes P.J. Rautenbach	108 Arizona Crescent, Blue Saddle Ranches			The EAP registered the I&AP.	2015-01-27
		Mr. Rautenbach registered as an I&AP and expressed a positive attitude towards the development.	2015-01-27	The EAP informed the I&AP that he will be kept informed throughout the process.	2015-01-27
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Johan Kriel	Plot 46 of Drumblade AH			The EAP provided the I&AP with the Background Information Document by hand	2015-01-14
		The I&AP requested to be registered as an Interested and Affected Party.	2015-01-23	The EAP registered the I&AP and requested his physical address to tend to his comments with more insight.	2015-01-23
		The I&AP replied with his address and stated his concern that the road, 100m from his entrance, will disturb the tranquillity of the area.	2015-01-24		
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26

Name	Organisation	Comments	Date	Response from Practitioner	Date
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments were received during the Phase 4 review period.		The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Hendrik J. Schutte	Mulbarton	The I&AP registered as an I&AP and would like to receive an invite to the public meeting as he is concerned about the environmental damage the road could cause.	2015-01-30	The EAP attached the project Background Information Document (BID) and Registered the I&AP. The EAP explained that SPOOR is in the initial stages of the Environmental Impact Assessment (EIA) for the proposed road and will provide more detail on the project and related meetings during the remainder of the EIA process. It was also mentioned that it was understood from the information gathered to date that the section of road relevant to SPOOR's application will connect to additional road infrastructure to serve future development in the area.	2015-01-30
		The I&AP queried why a six lane road was necessary in the middle of nowhere? It was unclear what or who would require such a road.	2015-02-05		
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		Mr Schutte made the following comments;	2016-06-27	The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		I noticed that the "Gauteng Highlands Development" might as well be assumed to represent "Blue Rose Developments" as many of the properties are either owned by that entity, or some in the process of being acquired by them. To what extent is Blue Rose a driving force behind this road? To perhaps provide easier access to the R59! {Blue Rose I think was also involved with The Eye of Africa Development.}		SPOOR was appointed as the Environmental Assessment Practitioner for the EIA process by Knight Piésold Engineers who were appointed by The Gauteng Roads Department. We have no appointment with the Blue Rose Blue Rose Group other than to engage them as part of the EIA process as per the EIA regulations.	2016-07-18
		2.1 page 9 Refers to "this 4.3km section is the middle section of an alignment that will stretch further north and south". [At the moment it will be a 4.3km section between nothing and no-where. Why start in the middle and not perhaps at either end? No indication is given on the plans/maps/diagrams from where and to where this north and south 'extensions' might go to/come from.		SPOOR was appointed for this section of road only. On appointment we asked the same question the Design Engineers and it was put to us that it is a budgetary issue and that the road will be developed in stages. We understand that Consultants have been appointed for the other sections of roads to the north and south as well but do not have detail regarding what stage their applications are at. We also received a copy of the proposed alignment of the K77 to the north and south of the section represented under this application from an Engineer appointed by the Midvaal Municipality and by other developers in the area. I attached it to this correspondence for your information.	
		It goes on to quote daily traffic estimate of 2938 vehicles of which 2507 is expected to be heavy vehicles! Where and how is that volume of heavy traffic going to be generated from or to within Drumblade? Is the north and south extension that are being kept secret at this stage planned to replace the R9 which at the moment carries a large volume of heavy vehicles? What will the R59 then be used for of heavy vehicles is going to be "diverted" onto this new road that is set to grow to 6 lanes.		It is our understanding as per the traffic impact assessments included in the draft EIA as well as the discussions with the Road Department that the proposed K77 will be constructed to alleviate future heavy traffic volumes on the existing roads in the area. The R59 was also taken into account during these studies.	
		Is the road reserve of the R59 not wide enough to add additional lanes to accommodate the expected increased traffic?		We do not know the answer to this question. We believe however that the intention of the proposed K77 is to provide additional traffic infrastructure to the existing infrastructure and also to different areas that that which the R59 serves.	

Name	Organisation	Comments	Date	Response from Practitioner	Date
		If the K77 extends to the north, is it not going to cut through the planned "Klipriver residential Estate" Do they know about this? Or is it perhaps part of the strategy to facilitate better access to the proposed Klipriver residential estate on a portion of the farm Driefontein 146IR		SPOOR was only appointed for the section of road presented in this application. We had meetings with the Roads Department where other parties including the Midvaal Municipality and Developers to the north of the K154 were also represented. During these meetings the main aim was to ensure that the position where the proposed road under this application connects with the K154 and Elizabeth Road in the south, are in the position as authorized by the Gauteng Roads Department.	
		What possible other major "high traffic generating" developments are planned in the surrounding areas that this road is to cater for? Which are not clearly outlined at this stage?		SPOOR is only aware of those mentioned in the Draft EIA and that which was provided to us by the Traffic Engineering Consultant mentioned in the second bullet.	
		Your report mentions a development that will go by the name "The Grace", done by Blue Rose. Where is that indicated on your maps?		It is shown in the drawings included under the Road Alignment Detail under Appendix 1.	
		How desirable is the vastly increased noise and diesel fume pollution going to be to these new "upmarket developments"?		These developments were taken into account in the Specialist assessments and associated mitigation measures were recommended. These recommendations will need to be re-evaluated from time to time to measure their effectiveness and adjusted accordingly.	
		Dealing only with this section of the K77 bigger picture strikes me as simply the "thin end of the wedge" once that is in then it is going to be so much easier to just "bulldoze" along. {pun intended}		Noted	
		6.3 No Go alternative: Third bullet, casual mention is made of the coming commercial, industrial and residential developments planned for the area, BUT NO DETAILS provided. What blank cheque are we signing by approving "this section" without knowing what the further implications are going to be?		Your concern is legitimate Sir. As aforementioned the purpose of the proposed road K77 is to provide traffic infrastructure for future anticipated development. Our answer would be that each of these developments will need to be scrutinized for their appropriateness on a case by case basis and the environmental impact be assessed	
		7.4.8: If ever there was "economy with the truth" this must be it. "air quality is expected to decrease SLIGHTLY from increased traffic". Surely the anticipated 2507 heavy vehicles per day mentioned earlier will do more than "slightly increase" the air Quality!!!		The context of this statement is made in the light of better air quality as a result of better traffic flow where traffic congestion creates decreased air quality. You are accurate in your comment though and we will update the report accordingly.	
		I am well aware that this road (K77) is just a small part of a very elaborate road network that was planned on a table top almost 50 years ago. How necessary is it to still follow that same line of thinking?		Noted Sir. This assessment is part of the detailed site assessments to review the original planning and make the required adjustments.	
		No comments were received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Mr. Straffen Short	Trinamics Consulting Engineers	The I&AP introduced himself as the engineer that assisted in the prelim route determination of the K77 and acts as the Civil and Traffic Consultant to developments to the north of the R550 (K154). Mr. Short asked to be registered as an I&AP.	2015-02-11	The EAP registered Mr. Short as an I&AP.	2015-02-11
		He also requested the contact details of the Consultant for the K77 north of the K154.		The EAP supplied Mr. Short with the Environmental Consultant's contact details	
		The I&AP enquired whether a better map was available of the alignment.	2015-02-17	The EAP supplied the I&AP with the latest KMZ file of the preliminary design.	2015-02-17
		The I&AP enquired who the engineers on the Project is.		The EAP supplied the I&AP with the contact details of the design engineers.	
				The EAP invited the I&AP to comment on the Draft Scoping Report and forwarded a Dropbox link via email.	2015-02-26
		No comments were received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		Mr Short made the following comments;	2016-06-17	The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		We are attending to a draft alignment of the 'new' K77 between K154 (in the south) and K144 (in the north). This road joins up exactly per the design drawings of 'your' K77 supplied to us by Mr. Jannie Viljoen. The Environmental consultant is Dr. Gwen Theron from Leap.			

Name	Organisation	Comments	Date	Response from Practitioner	Date
		We are also attending to the traffic issues & road planning for the proposed Gateway Eco Estate township situated on parts of the farm Driefontein 146IR and Rem of Ptn 1 and Ptn 4 of the farm Roodepoort 149IR. The developers are Central Developments, Ms. Sonja Meissner-Roloff is the town planner and Leap is the environmental consultant. A township application was submitted x2 weeks ago.			
		Gautrans is busy attending to the route determination for proposed re-alignment of K89 from its current position in the east westwards to intersect with the 'new K77' and further westwards up to the proposed Gateway Eco Estate. Arup (Mr. Mike Kelly) is the design engineer. They are also attending to proposals for a new interchange of K89 & R59 freeway (the interchange is not indicated on my drawing, but it is spaced exactly halfway between the Klipriver off ramp at Heineken & Kliprivier offramp in Brackendowns).			
		We are also, on behalf of Midvaal Local Municipality, attending to draft proposals for the Midvaal Spine Route - a north-south class 3 road in-between the R59 freeway and K77, from Brackendowns in the north to Samancor in the south. A rough alignment thereof is indicated on my drawing.		The comments were dually noted by the EAP	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Gail Andrews	Private capacity				
		Ms. Andrews requested a route map to determine whether nesting White-bellied Korhaan are affected by the road.	2015-04-01	The EAP forwarded the Dropbox link to the report.	2015-04-01
		Hi, sorry I am having some difficulty with Drop box. Our IT does not support it. I would like to just get a one page if possible	2015-04-01	The EAP forwarded a PDF-map of the route as well as a KMZ-file and two images to give the I&AP clarity of where the proposed route alignment is.	2015-04-01
		The I&AP confirmed that it was not the area she had in mind and that the White-bellied Korhaan will not be affected.	2015-04-01		
		No comments where received during the Phase 3 review period.		The I&AP received a Dropbox link to the Final Scoping Report and was invited to comment. A hard copy was made available for viewing at the Walkerville Showgrounds.	2015-04-15
		No comments where received during the Phase 4 review period.	2016-06-17	The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 4 review period.	2016-06-17	The I&AP received a Dropbox link to the Draft EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-06-17
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04
Madeleine Botes Dr G Theron	LEAP Environmental	The I&AP requested to be registered as and I&AP	2016-06-21	The I&AP was registered	2016-06-21
		No comments where received during the Phase 5 review period.		The I&AP received a Dropbox link to the Final EIA Report and was invited to comment. A hard copy was made available for viewing at the Old Touch of Green Nursery .	2016-08-04

