

**PROPOSED CONSTRUCTION OF THE ILANGA CONCENTRATED SOLAR POWER (CSP) 7 FACILITY, NEAR UPINGTON,
NORTHERN CAPE PROVINCE
COMMENTS AND RESPONSES REPORT**

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COMMENTS RECEIVED: EIA PHASE

No.	Issue	Issue Raised By	Response
LATE COMMENTS RECEIVED ON THE SCOPING REPORT			
1.	<p>The Department of Water and Sanitation (DWS) hereby acknowledges receipt of your Environmental Impact Assessment Process Draft Scoping report for the proposed construction of Ilanga CSP 7, 8 and 9 facilities approximately 30 km east of Upington, Northern Cape, that is on quaternary catchment D73D.</p> <p>The water user / developer is expected to assess all the potential water uses [associated with the development] as defined under section 21 of the National Water Act, 1998 [Act 36 of 1998]. All identified water uses will need to be authorized in terms of section 40 of the National Water Act unless such a water use is permissible under section 22 of the Act.</p> <p>Our assessment indicates that quaternary drainage region D73D is excluded from General Authorisations for taking of water from a [ground] water resource [as extended under Notice 837 in the Government Gazette of 23 September 2010]. Kindly note that that energy developments / projects are not part of small industrial users and as such cannot be entitled to the water use allowance set aside for small industrial users as determined by the General Authorisation.</p> <p>Activities that might have an impact on water resources such as (i) storm water management (ii) waste management (iii) sanitation (iv) sedimentation and erosion (where it is not defined as a water use) (v) storage of</p>	<p>MC Cebekhulu Case Officer Orange Proto CMA</p> <p>Department of Water and Sanitation</p> <p>Letter: 17-05-2016</p>	<p>A water use license application will be submitted by the applicant once the project receives preferred bidder status from the Department of Energy. The relevant water use activities will be applied for as required.</p>

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	<p>hazardous substances, should be managed and mitigated as stated in the EMP of the Proposed Project. The Department will be content with the inclusion of these proposed management and mitigation measures in the environmental management plan for the project. Kindly note that any deviations to these measures should be communicated to DWS in writing.</p> <p>Due the high number of renewable energy projects and are taking part in the Department of Energy [DOE] bidding process, the Department [DWS] has resolved to only processing applications for water use authorisations received from developers who have attained preferred bidder status. Developers who wish to submit applications for water use authorisations may however proceed to do so, with the understanding that their applications will be processed as soon as we have confirmation of their status with the DOE. Attached to this letter is annexure 1 that details information, which must be submitted as part of the application for water use authorisation.</p> <p>As part of the requirements for the DOE proposals, the Department [DWS] will issue non-binding letters to water users / bidders as required under clauses 2.4.4.1.2 and 2.4.4.1.3 of Part B: Qualification Criteria of tender Number DOE/001/2011/2012. The information required by the Department in order to issue the non-binding letters is contained on the attached annexure 2 [notes of the confirmation to be provided by DWS on water availability on request from bidders in the REFIT programme].</p>		

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ACKNOWLEDGMENT LETTERS AND COMMENTS RECEIVED FROM ORGAN OF STATE DEPARTMENTS			
2.	This serves as a notice of receipt and confirms that your application has been captured in our electronic AgriLand tracking and management system. It is strongly recommended that you use the on-line AgriLand application facility in future. Detail of your application as captured: Application type: Karoshoek Solar Valley Development Your reference: Property Description: Lot 944 Karos Settlement, Matjiesrivier 41, Trooilaps Pan 53 Dated: 22 January 2016 Please use the following reference number in all enquiries: AgriLand reference number: 2016_03_0034	HJ Buys Land Use and Soil Management Department of Agriculture, Forestry and Fisheries Letter: 2-03-2016	Acknowledgment noted, no response required.
3.	Thank you for your letter dated 22 January 2016. The South African National Roads Agency SOC Limited (SANRAL) has no comment with regards to the above application.	Rene de Kock Statutory Control South African National Roads Agency Limited (SANRAL) Letter: 09-03-2016	It is noted that SANRAL has no comment on the application for environmental authorisation for the Ilanga CSP7 project.
ISSUES RAISED BY LANDOWNERS			
4.	I am currently renting properties across the N10 (across the proposed CSP 7, CSP 8 and CSP 9). Thus, I will be affected by the projects.	Leon Olivier Adjacent Landowner Issue raised at Public Open Day	Leon Olivier has been registered as an Interested and Affected Party (I&AP) on the project's database.

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		5-05-2016	
5.	Direct impact on my surroundings. Requests correspondence and a consolidated map of all the projects.	Burger van Staden Adjacent Landowner Issue raised at Public Open Day 5-05-2016	Burger van Staden has been registered as an I&AP on the project's database and his contact details were updated. A consolidated layout map was emailed to Mr Van Staden on 20 May 2016.
6.	A servitude has already been registered on my farm (Rest Vaalkop 40 No. 6). How long will it take for the registration of the servitude and when will the cost for the servitude be determined?	Danie Strauss Impacted Landowner Farm Vaalkoppies 6/40 Issue raised at Public Open Day 5-05-2016	No servitude is required on Vaalkoppies for the proposed projects.
7.	I am renting the land on which one of the projects are proposed, as well as a local resident. I request the consolidated map showing all the Ilanga projects.	Elna Krapohl Impacted Tenant Olienhof Boerdery Issue raised at Public Open Day 5-05-2016	Elna Krapohl has been registered as an I&AP on the project's database. A consolidated layout map was emailed to him on 20 May 2016.
8.	The Ilanga projects are proposed adjacent to my farm. My concerns are: 1. Safety and security will be an issue. How will it be ensured?	Johan van der Colff Adjacent Landowner Trooilaps Pan 20/53	1) Impacts relating to safety and security were assessed in the social impact assessment of the EIAR. Mitigation measures proposed can potentially reduce the impact through fencing of the site and having access controlled

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	<p>2. We are farming with exotic game and the main reason we bought the farm is due to its locality. The project will have a negative impact on the business.</p> <p>3. The towers will have a visual impact.</p>	<p>Issue raised at Public Open Day 5-05-2016</p>	<p>entrances and exits (refer to Appendix J and K of the EIAR).</p> <p>2) It is anticipated that visual impacts and impacts on sense of place are expected to be of a low significance during the operational phase.</p> <p>3) The proposed project will have greatest impact on the Karoshoek Valley which is under development for similar projects. Outside the Karoshoek Valley where the majority of sensitive receivers are located impacts are likely to be low. Within the Karoshoek Valley, the most critical sensitive receivers are likely to be residents of local homesteads. A small number of people are likely to be affected. Views over the development are unlikely to be possible due to the relative elevation of receivers. This means that the main impact will be a view of the tower set within a relatively natural landscape. Because of the relative elevation of receivers and the VAC of the surrounding landscape nuisance impacts such as glint and glare are unlikely and should be easily mitigated. Given the changing character of the setting in which the development is proposed, the distances from the majority of sensitive receptors and the way in which surrounding landform helps to mitigate broader impacts, there is no reason on landscape and visual impact grounds why the proposed project should not be authorised.</p>
9.	<p>Why do the project personnel never contact us? We are left in the dark.</p>	<p>JC Wanl Adjacent Landowner</p>	<p>Savannah Environmental, on behalf of Emvelo Holdings Limited, provided written notice of the EIA process and availability of the Scoping and EIA reports for public review to impacted and adjacent landowners and occupiers as per</p>

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		Issue raised at Public Open Day 5-05-2016	<p>the requirements set out in Regulation 41 of the EIA Regulations, 2014.</p> <p>For the Scoping phase of the project, the I&AP notification included the distribution of written notices announcing the availability of the Scoping Report for public review on 22 January 2016 (refer to Appendix C5), the placement of site notices and the placement of advertisements in the "Volksblad" newspaper on 21 January 2016 and the "Gemsbok" newspaper on 29 January 2016 (refer to Appendix C2).</p> <p>For the EIA phase of the project, I&APs were consulted by means of a Public Open Day which was held on 5 May 2016. Written notices announcing the availability of the EIA Report for public review were distributed at the commencement of the review period.. Advertisements announcing the availability of the EIA Report for public review will be placed in the "Volksblad" newspaper and the "Gemsbok" newspaper at the commencement of the review period. Further consultation with landowners will continue to take place through telephonic discussions and written correspondence during the EIA phase of the project.</p>
10.	<p>I am a concerned farmer. My farm is next to some of the sites. My concerns are:</p> <ol style="list-style-type: none"> 1. Security of our game and property 2. Visual effect, one tower will be right on our doorstep. We bought our farm to be away from all lights. 3. Effect of weather and rainfall temperatures. 	<p>Marius Offer Adjacent Landowner</p> <p>Trooilaps Pan RE/53</p> <p>Issue raised at Public Open Day</p>	<ol style="list-style-type: none"> 1) Impacts relating to safety and security were assessed in the social impact assessment of the EIAR. Mitigation measures proposed can potentially reduce the impact through fencing of the site and having access controlled entrances and exits (refer to Appendix J and K of the EIAR). 2) The visual impact assessment indicated that it is likely that operational lighting will be required at buildings

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		5-05-2016	<p>and security lighting may be required within the trough field. The authorised projects within the greater Karoshoek Valley are extensive and pose a more major risk to the transformation of the night time landscape. The extent of this transformation is not known. If flood lighting is deemed necessary for each plant throughout the hours of darkness then impacts are likely to be significant. However, if low level operational lighting is required at buildings then it is likely that each plant will not appear significantly different than the farmsteads that are scattered through the landscape. If the former approach is adopted then floodlighting an additional site is likely to be noticeable. If however only low level lighting around buildings is required then the proposed development of the Ilanga CSP 7 Project is likely to have negligible impact on the night time landscape. The visual impact assessment made the following recommendation which have been included in the EIAr and the EMPr:</p> <ul style="list-style-type: none"> » Plan to utilise infra-red security systems or motion sensor triggered lighting; » Ensure that lighting is focused on the development with no light spillage outside the site; and » Keep lighting low, no tall mast lighting should be used. <p>It was therefore concluded that the potential light impact of the tower will be low (refer to Appendix I of the Ilanga CSP 7 Project).</p>

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			3) There is no scientific evidence available that can prove that the proposed projects will have an effect on the on the rain and weather patterns.
ECOLOGICAL IMPACTS			
11.	How many power lines will be investigated in the EIA process for the grid connection infrastructure?	Samantha De la Fontaine District Ecologist Northern Cape Department of Environment and Nature Conservation: Meeting: 05-05-2016	One 400kV power line and one 132kV power line will be investigated to connect all of the CSP facilities to the Eskom MTS Substation, however several power line route alternatives will be assessed. The preferred power line route will be determined through the EIA process. The preferred point of connection for the facility will be determined by Eskom should the project be awarded preferred bidder status by the Department of Energy.
12.	How many of the Ilanga projects have received preferred bidder status?	Jacoline Mans Chief Forester: NFA Regulation	Ilanga CSP 1 (100MW trough plant) is the only project which has been awarded preferred bidder status by the Department of Energy at this stage.
13.	What is the footprint of the entire Karoshoek Solar Development?	National Department of Agriculture, Forestry and Fisheries	The development footprint of each of the sites vary from between 600ha and 1000ha. The total development footprint is approximately 30 000 ha.
14.	How much vegetation would be cleared in total?		The entire area within which the infrastructure is placed will be cleared of vegetation.
15.	How will you mitigate impacts on vegetation?	Meeting: 05-05-2016	Areas which are considered to be of very high to high ecological sensitivity are excluded from the development. Relevant permits will be applied for where sensitive areas cannot be avoided. Where required, an offset will be provided to compensate for loss of vegetation.
16.	It should be noted that we will not issue new licenses until the conditions of the first license issued for Ilanga CSP 1		The delay in submitting the progress reports was due to the fact that construction commenced in October 2015 and the

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	<p>have been met. A condition of the license is that we require progress reports to be submitted every 6 months.</p> <p>In terms of issuing an extended license, I will need to know what percentage of vegetation has already been cleared. In addition, I will need a map that will show me what area the extension of the license would be relevant to and the remaining footprint that still needs to be cleared.</p> <p>I suggest that you apply for licenses in phases as they are needed. The licenses are valid for a two-year period.</p>		<p>developer had not reached the 6-month point as yet. However, the progress report will be submitted to DAFF shortly.</p> <p>The extension of the license is required to cover the related construction activities namely the construction of the power line and pipeline which would occur after the plant is constructed. It is agreed that future licenses would be applied for in a phased approach.</p>
17.	<p>The cumulative impact of all these projects is a concern to DAFF and DENC. We realise that the site is located within a Renewable Energy Development Zone (REDZ) but nevertheless, the impacts on the <i>Boscia</i> species will be significant and cannot be mitigated. A biodiversity offset may be triggered if more of these projects are awarded preferred bidder status and proceed to construction. Negotiations should be commenced with DAFF: NFA Regulation and DENC if a biodiversity offset is triggered as soon as possible as this may delay the process in obtaining the flora permit and NFA license.</p> <p>A land offset is preferred to ensure that the affected vegetation types are conserved elsewhere. A land offset will need to undergo a formal declaration process under NEMA or NEMPA which is a lengthy process.</p> <p>Licenses are usually issued once we have received written commitment from the developer to implement a land offset.</p>		<p>The project developer plans to implement greening initiatives that will empower local communities by creating potential income streams for communities. Where required, an offset will be provided to compensate for loss of vegetation. This will be implemented in consultation with DAFF and DENC in order to meet their specific requirements in this regard.</p>

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18.	<p>From DAFF's perspective greening plans are regarded as a mitigation and not an offset. You will note that in the initial license provided you with options to plant trees and/or donate trees to communities.</p> <p>In terms of cumulative impacts, once a development exceeds a certain threshold greening is no longer regarded sufficient. If a biodiversity offset is required, we would like to see a land offset being implemented to create a conservation area. Land offsets can still benefit the community if it is declared a nature reserve and/or the land is donated to the community, communities could build ecotourism facilities/activities.</p> <p>The location of the declared area would need to be negotiated. We would need to understand the vegetation types that the development would impact on and whether a significant contribution to biodiversity conservation is made. If the area within the development footprint is totally degraded, it would not be an appropriate area for a land offset.</p>		<p>A land offset could potentially be located within the Karoshoek Solar Valley development area since the development footprint for this project would be approximately 11 173 ha of the 25 000ha – 30 000ha. The remaining land would remain undeveloped.</p>
19.	<p>Did you purchase the land or are you leasing it from landowners on a long-term basis?</p>		<p>The farm portion for Ilanga CSP 1 has been secured and the developer plans to purchase the remaining farms outright.</p>
20.	<p>A 20 000 ha nature reserve would make a meaningful contribution to biodiversity conservation.</p>		<p>Comment noted.</p>
21.	<p>Please can you forward me a kml file showing all the CSP projects and related infrastructure?</p>	<p>Samantha De la Fontaine District Ecologist Northern Cape Department of</p>	<p>A kml file showing the CSP projects and related infrastructure was emailed to Samantha De la Fontaine.</p>

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		Environment and Nature Conservation: Meeting: 05-05-2016	
WATER USES AND WATER USE LICENSE APPLICATION PROCESS			
22.	The comments provided at this meeting must be considered as comments received from the Department of Water and Sanitation (DWS) on the EIA process. We will sign-off on the minutes which can be included in the final EIA Report. The DWS usually submits standard comments on EIA Reports.	Shaun Cloete Orange Proto CMA Department of Water and Sanitation	Comment noted, the minutes of the meeting were submitted to the DWS as requested. The DWS submitted standard comments via the letter dated 17 May 2016 (refer to Appendix C6).
23.	A new administration process is being implemented by DWS where applicants are required to register their intent to submit a water use license application (WULA). A form is required to be completed and returned for each project.	Meeting: 05-05-2016	The project proponent will submit these forms to the DWS as required.
24.	It should be noted that limited water is available in the Orange River, it is in a negative state. However, renewable energy projects are considered as strategic water users and therefore WULAs will be prioritised and water will be provided. The DWS urges developers to investigate ways in which to treat and reuse water in their project scope.		Comment noted. The developer has interest in investigating ways in which to treat and reuse greywater in their project scope considering that the developer is proposing to develop a solar park consisting of several CSP facilities.
25.	In terms of the WULA, power lines and pipe lines may trigger Sections (c) and (i) of the National Water Act (Act No. 36 of 1998). The blow down going to the evaporation pond will trigger Section 21(h) of the National Water Act. The designs for the evaporation ponds are to be included in the WULA.		Comment noted, the relevant listed activities will be applied for as part of the WULA.

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26.	How will sewerage be managed on the site?		Chemical toilets will be used during the construction phase. Closed septic tank systems will be installed for use during the operation phase.
27.	The Municipality's waste water treatment facilities are constrained and will not have sufficient capacity to take on sewerage. Developers are advised to develop solutions to reduce and treat waste.		The project proponent will consider ways in which to reuse and recycle water from the evaporation ponds for other uses such as cleaning and ablution facilities in order to reduce their footprint on the water they plan to abstract from the river. The applicant aims to establish public private partnerships (PPPs) with the relevant stakeholders to develop a new waste water treatment plant should more of their projects receive preferred bidder status from the DoE.
28.	Is the ground water resource sufficient for these projects?		Hydrological pump tests have been undertaken and these have demonstrated that the ground water is insufficient for these projects.

COMMENTS RECEIVED: SCOPING PHASE

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I&AP REGISTRATION AND PUBLIC PARTICIPATION			
29.	Your company is currently conducting an Environmental Impact Assessment for the Ilanga CSP 7, 8 and 9. Please could you forward me the BID for this application and register me as an Interested & Affected party?	Melanie Miles Content Researcher Leads 2 Business Email: 03-02-2016	Ms Miles' contact details were added to the project's Interested and Affected Parties (I&AP) database. The background information document was emailed to Ms Miles on 3 February 2016.
30.	Has the draft Scoping Report been sent to our offices?	Shaun Cloete Environmental Officer Department of Water and Sanitation Meeting: 15-02-2016	The draft Scoping Report was submitted to the Department of Water and Sanitation (DWS) via courier on 25 January 2016 and signed for on 28 January 2016. The proof of delivery is attached in Appendix C5 Organs of State Correspondence.
31.	Thank you for explaining the proposed projects. I will pass this information onto the Municipal Manager. However, I will advise that you set up another meeting so that you explain the project in detail to the municipal manager in person.	Mr G. Bessergn On behalf of the Municipal Manager //Khara-Hais Local Municipality Meeting: 18-02-2016	A meeting will be arranged with the Municipal Manager during the EIA phase of the project as part of the public participation process.
32.	I have submitted my comments in writing to Savannah Environmental. Please can these be incorporated and addressed.	Jacoline Mans Chief Forester: NFA Regulations	Savannah Environmental confirms receipt of DAFF's submission dated 10 February 2016 wherein the issue pertaining to a biodiversity offset agreement and the

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		Department of Agriculture, Forestry and Fisheries Letter: 18-02-2016	appointment of an offset specialist was raised. DAFF's recommendation has been considered and a formal response provided below (refer to Item 8).
HERITAGE IMPACTS			
33.	Emvelo Eco Projects (Pty) Ltd appointed Savannah Environmental (Pty) Ltd (Savannah) to undertake an Environmental Impact Assessment (EIA) process for the Ilanga CSP 7 Facility near Upington, Northern Cape Province. The Ilanga CSP 7 Project forms part of the larger Karoshoek CSP Solar Valley Development. A Scoping Report was completed for the development in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) Regulations 2014. Emvelo is the process of submitting two other applications for additional infrastructure within authorised areas of the Karoshoek Development i.e. Ilanga CSP 8 and Ilanga CSP 9. The proposed Ilanga CSP 7 facility is located on portion 2 of the farm Matjiesrivier 41 and portion 4 of the farm Trooilaps Pan 53. Savannah contracted Jaco Van der Walt and John Almond to conduct the Archaeological Scoping Study and the Palaeontological Desktop Assessment for the project respectively. Van der Walt, 2015. Archaeological Scoping Report for the Ilanga CSP 9 Facility and associated infrastructure within	Natasha Higgitt Heritage Officer South African Heritage Resources Agency Letter: 27-01-2016	The letter of acknowledgment and comments received from the South African Heritage Resources Agency (SAHRA) is recognised. An Archaeological Impact Assessment will be conducted in the EIA phase of the project and submitted to SAHRA for comment prior to the submission of the final EIA Report to the competent authority. Assessment of burial grounds, graves, historical structures and other built environment will be conducted where relevant. In addition, a Visual Impact Assessment will be completed on identified heritage resources as required. It is noted that no further palaeontological assessment is required for the proposed Ilanga CSP 7 Facility, as recommended by the specialist study. The appropriate Fossil Finds Procedure will be developed and included in the Environmental Management Programme (EMPr). The HIA and EIA report will be submitted to SAHRA via the SAHRIS website once it is available for review and comment.

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	<p>the Karoshoek Solar Valley Development near Upington, Northern Cape Province.</p> <p>The author found that archaeological resources such as Stone Age lithics would be present within the project area and around pans and seasonal water courses. Farming infrastructure is likely to be present, though it may not be older than 60 years. Additionally, stone cairns have been recorded in the surrounding regions and may represent graves, and these can be expected within the project area.</p> <p>Recommendations provided in the report are as follows:</p> <ul style="list-style-type: none"> • A Phase 1 Archaeological Impact Assessment (AIA) must be conducted as part of the EIA phase of the project; and • As part of the public consultation process of the EIA, the presence of graves, archaeological and historical sites should be determined. <p><i>Almond, 2015. Palaeontological Heritage Assessment: Desktop Study for the Proposed Ilanga CSP 7, 8 (tower) and 9 (trough) facilities and associated infrastructure within the Karoshoek Solar Valley Development near Upington, ZF Mgqawu District, Northern Cape.</i></p> <p>The author combined the three applications i.e. Ilanga CSP 7, Ilanga CSP 8 and Ilanga CSP 9 into one Palaeontological Desktop Study. The author found that the project area is underlain by unfossiliferous igneous and metamorphic basement rocks. The bedrock in the project area is capped</p>		<p>Ratha Timothy of Ngwao-Boswa Ya Kapa Bokone (NBKB), the Northern Cape Provincial Heritage Resource Authority is registered as an I&AP on this project had has been notified of the EIA process as required. Application regarding the built environment will be provided by the applicant if required.</p>

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	<p>by calcrete pedocretes that may be tentatively correlated with the Mokalanen Formation which may contain trace fossils and mammalian trackways. The calcrete is overlain by a thin layer of potentially fossiliferous Aeolian sands of the Gordonia Formation and is of very low palaeontological sensitivity. No known fossil sites are located within the project area.</p> <p>Recommendations provided in the report include:</p> <ul style="list-style-type: none"> • All the assessed application areas should be exempt from further palaeontological studies; • Excavations during construction deeper than 1 m into sedimentary bedrock should be monitored for fossils remains by the ECO; • Should substantial fossil remains be uncovered during the construction phase off the project, they should be stabilised and reported to the South African Heritage Resources Agency (SAHRA). A professional palaeontologist must assess the find and provide further recommendations; and <p>The above recommendations must be incorporated into the Environmental Management Plans (EMPs) for each of the applications.</p> <p>Interim Comment</p> <p>Regarding archaeological and palaeontological heritage resources, the SAHRA Archaeology, Palaeontology and Meteorites Unit accepts the submitted Archaeological Scoping Report and Palaeontological Desktop Study and</p>		

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	<p>their respective recommendations, and has no objections against the development. The following additional conditions must be adhered to and must form part of the final EIA Phase of the project:</p> <p>A Heritage Impact Assessment (HIA) must be completed for the proposed Ilanga CSP 7 Facility. The HIA must include the following studies:</p> <ul style="list-style-type: none"> • An Archaeological Impact Assessment (AIA); • An assessment of Burial Grounds and Graves, if relevant; • An assessment of historical structures and other built environment, if relevant; incorporate comments regarding heritage resources recorded during the public consultation phase of the project; • A VIA must be completed on identified heritage resources. <p>No further palaeontological assessment is required for the proposed Ilanga CSP 7 Facility. A Fossil Finds Procedure must be developed for the project to ensure that standard protocols and steps are followed should any fossil resources be uncovered during the construction phase of the project. These procedures should outline the steps and reporting structure to be followed in the instance that fossil resources are found. These procedures must be incorporated into the final Environmental Management Plan for implementation.</p> <p>Final comments will be published once the above has been submitted along with the EIA for the project.</p>		

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	<p>Decisions regarding Built Environment will be provided by Ngwao-Boswa Ya Kapa Bokone (NBKB), the Northern Cape Provincial Heritage Resource Authority (Ratha Timothy - rtimothy@nbkb.org.za / 053 831 2537).</p> <p>It is noted that associated linear infrastructure for the Ilanga CSP 7 facility will be assessed as part of a Basic Assessment Process. Please ensure that a heritage component forms part of the BAR and is submitted to SAHRA for comment.</p>		
IMPACTS ON INFORMATION TECHNOLOGY COMMUNICATIONS (ITC) INFRASTRUCTURE			
34.	No obstruction on these three solar farms.	<p>Leonard Shaw Specialist: Network Planning</p> <p>Telkom:</p> <p>Email: 28-01-2016</p>	It is noted that the proposed project has no impact on Telkom's infrastructure.
35.	<p>With reference to your above-mentioned application, I hereby inform you that our Client (Telkom SA SOC Ltd) approves the proposed work indicated on your drawings in terms of Section 23 of the Electronic Communication Act No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Telkom SA SOC Ltd) will be affected by this proposal.</p> <p>Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at 081 362 6738 from our</p>	<p>Chris Schutte Mvelaphande Trading (on behalf of Telkom)</p> <p>Letter: 03-02-2016</p>	Telkom's approval is noted. An updated file will be submitted to Telkom if the project is awarded Preferred Bidder Status by the Department of Energy following completion of the EIA process.

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	<p>Client (Telkom SA SOC Ltd) Network Field Services before commencement of work.</p> <p>Approval of the proposed project is valid for six months. If construction has not commenced within this period, then a file must be resubmitted for approval.</p> <p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office. Please notify this office and forward an as built plan, within 30 days of completion of construction.</p>		
ECOLOGICAL IMPACTS			
36.	<p>The Directorate: Forestry Management (Other Regions) in the National Department of Agriculture, Forestry and Fisheries (DAFF) is responsible for implementation of the National Forests Act, Act 84 of 1998 (NFA) and the National Veld and Forest Fires Act, Act 101 of 1998 as amended. The developer must take note of the following sections of the NFA:</p> <p>1.1 Section 12(1): "The Minister may declare-</p> <ul style="list-style-type: none"> (a) a particular tree, (b) a particular group of trees, (c) a particular woodland; or (d) trees belonging to a particular species, to be a protected tree, group of trees, woodland or species. <p>1.2 Section 15(1): "No person may-</p>	<p>Jacoline Mans Chief Forester: NFA Regulation</p> <p>Department of Agriculture, Forestry and Fisheries</p> <p>Letter: 10-02-2016</p>	<p>The developer takes note of Sections 12(1), 15(1), 62(2)(c) and 58(1) of the National Forests Act, Act 84 of 1998 (NFA).</p> <p>The number and size classes of trees that the project would impact on will be provided in the EIA and Ecological Impact Assessment which will be undertaken by an ecological specialist in the EIA phase of the process, and will be confirmed through a final walk through of the development footprint prior to commencement of construction. It is noted that an environmental off-set may be required to compensate for the potential residual environmental impacts that the proposed developments would have on the affected ecosystems as well as for the loss of protected tree species.</p> <p>The applicant acknowledges the Department's recommendation to appoint an off-set specialist to determine potential residual impacts and the extent of such</p>

No.	Issue	Issue Raised By	Response
	<p>(a) Cut, disturb, damage or destroy any protected tree; or</p> <p>(b) Possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except-</p> <p>(i) under a license granted by the Minister; or</p> <p>(ii) in terms of an exemption from the provision of this subsection published by the Minister in the Gazette on the advice of the Council."</p> <p>1.3 Section 62(2)(c): "Any person who contravenes the prohibition on-</p> <p>(i) The cutting, disturbance, damage or destruction of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(a); or</p> <p>(ii) The possession, collection, removal, transport, export, purchase or sale of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(b), or any forest product derived from a temporarily protected tree, group of trees or protected tree, is guilty of a first category offence.</p>		<p>impacts. This will be investigated in the EIA phase of the process. If an off-set is deemed necessary, then the exact nature and extent of the off-set will be negotiated with the relevant parties, including DAFF and DENC.</p> <p>It is noted that the search and rescue of trees, particularly the transplanting of the <i>Boscia</i> species, is not practically feasible. The appointed ecologist will be requested to propose alternative mitigation measures in this regard for further investigation in the EIA Phase of the process.</p> <p>The cumulative impact will be assessed in detail in the EIA Phase and the significance rating will be verified.</p> <p>The Aquatic Scoping Assessment was undertaken at a desktop level and the vegetation types will be confirmed once the specialist has undertaken the field assessment. The relevant NFA licenses will be applied for should <i>E. pseudebenus</i> be disturbed during construction.</p>

No.	Issue	Issue Raised By	Response
	<p>1.4 Section 58 (1): "Any person who is guilty of a first category offence referred to in sections 62 and 63 may be sentenced to a fine or imprisonment for a period of up to three years, or to both a fine and such imprisonment."</p> <p>1.5 The list of protected tree species under section 12(1) (d) of the National Forests Act, 1998 (Act No. 84 of 1998) was published in GN1161 of 20 November 2015.</p> <p>2. COMMENTS ON DRAFT SCOPING REPORT</p> <p>2.1 The report confirms the presence of NFA listed protected tree species on site and the significant local impact on protected and Red Data plant species due to the large number of renewable energy projects comprising the so-called Karoshoek Solar Valley development. No indication was given of the anticipated extent of the impact, i.e. number and size classes of trees to be impacted on. Due to the large-scale development footprint of about 700 to 1000 ha per 150 MW facility, of which there about 11 in the Karoshoek Solar Valley and the cumulative impacts thereof, an environmental off-set may be necessary to compensate for the residual environmental impact that the development(s) would have on the affected ecosystems (some of which comprise of veld types that have been significantly transformed and/or are under-protected) and for the loss of keystone tree species.</p>		

No.	Issue	Issue Raised By	Response
	<p>2.2 If an off-set is triggered it may cause a delay in obtaining the NFA License(s) and Flora Permit(s). The developer(s) are therefore encouraged to act pro-actively by appointing an off-set specialist to determine whether residual impacts would occur, and the extent of such impact, in which case the outcome of such a study would be awaited before any license/permit can be issued. The recommendation of any off-set specialist employed may be followed, but all parties involved (including the DAFF and DENC) must agree on the exact nature and extent of the off-set in writing. The provincial Department of Environment and Nature Conservation (DENC), Ms. Elsabe Swart, plays a key role in any environmental off-sets relating to the Northern Cape Province and must be included in such discussions.</p> <p>2.3 The Scoping Report stated that impacts can be mitigated by search and rescue of trees (<i>Boscia</i> species). Such a recommendation is not practically feasible. The species has the deepest recorded root depth of all woody species in the world and cannot be transplanted with much success. In pilot projects to date, the mortality rate of transplanted mature specimens was 100% after two years. The relocation of nursery grown seedlings from planting bags to the soil has the same high rate of mortality. Trees should rather be avoided as far as possible.</p> <p>2.4 Page 103 of the Scoping Report (CSP 7) stated that the cumulative impacts on protected trees "will likely</p>		

No.	Issue	Issue Raised By	Response
	<p>be regarded as low". This Department cannot agree with the statement. The DAFF has already issued one license at Karoshoek Solar Park for construction of one of the numerous facilities planned on site. The one facility has a development footprint of 530 ha and during construction the developer realised that the number of protected trees to be impacted on was grossly under-estimated. It was almost double the numbers provided to the Department. If one (of 11 or more) project already flagged the need for a potential off-set, the protected tree impacts of eleven or more similar projects adjacent to each other, may have significant impacts that cannot be avoided, hence the cumulative impact cannot be regarded as 'low'.</p> <p>2.5 Page 19 of the Aquatic Scoping Assessment refers to the water extraction point at the Orange River, affecting the "Endangered" Lower Gariiep Alluvial Vegetation" type. The report stated that the vegetation type supports the rare and protected <i>Euclea pseudebenus</i> which was not mentioned in the Ecology report. Kindly note <i>E. pseudebenus</i> is listed as 'protected' under the NFA and may not be damaged or disturbed without a NFA License.</p> <p>Thank you for notifying this Department of the proposed development and allowing us to provide inputs.</p>		
37.	<p>The Scoping Report stated that impacts can be mitigated by search and rescue of trees (<i>Boscia</i> species). This recommendation is not practically feasible. The <i>Boscia</i> species have the deepest recorded root depth of all woody</p>	<p>Jacoline Mans Chief Forester NFA Regulation</p>	<p>It is noted that the search and rescue of trees, particularly the transplanting of the <i>Boscia</i> species, is not practically feasible. The appointed ecologist will be requested to</p>

No.	Issue	Issue Raised By	Response
	species in the world and cannot be transplanted with much success. The specialist will need to make an alternative recommendation.	Department of Agriculture, Forestry and Fisheries	propose alternative mitigation measures in this regard for further investigation in the EIA Phase of the process.
38.	The Department is concerned about the cumulative impacts. The Scoping Report indicated that 11 projects will form part of the larger Karoshoek Solar Valley Development; this will have high cumulative impacts. We have already gone through the process of license application for the Karoshoek development and the number of protected trees to be impacted was highly underestimated. We were requested to amend the license to increase the number of protected plant species (almost double the numbers). One project alone is already close to that threshold of 2000 protected tree species and if that threshold is exceeded it might trigger a biodiversity offset. As the Karoshoek developments increase, DAFF will be looking at the bigger picture. The developers must be proactive and budget for a biodiversity offset area. The offset area will need to be negotiated with DENC and DAFF. It is definitely necessary to appoint an offset specialist.	Meeting: 18-02-2016	The applicant acknowledges the Department's recommendation to investigate an offset area and appoint an off-set specialist to determine potential residual impacts and the extent of such impacts. This will be investigated in the EIA phase of the process. If an off-set is deemed necessary, then the exact nature and extent of the off-set will be negotiated with the relevant parties, including DAFF and DENC.
39.	The developer underestimated the number of protected species for Ilanga 1, and they applied for an amendment and the amount increased from 1 000 to over 3 000 trees. I did mention this as a condition in the first permit that cumulative impacts will be looked at for additional phases. Offsets will definitely be triggered in the future phases.	Samantha De la Fontaine District Ecologist Northern Cape Department of Environment and Nature Conservation	It is noted that a biodiversity off-set specialist may be required to assess cumulative impacts on the number of protected tree species. This requirement will be investigated in the EIA Phase of the project.
40.	Will there only be one power line from the entire project to the Eskom Substation. Too many power lines can have an impact on birds.	Meeting:	A power line for the Ilanga 1 project has been authorised. The developer proposes the construction of a second power line that is required for the remaining solar developments that form part of the Karoshoek Solar Valley Development.

No.	Issue	Issue Raised By	Response
		18-02-2016	The grid connection infrastructure will be assessed in a separate Basic Assessment process. An Avifaunal Impact Assessment will form part of this process.
41.	Why does the developer not use the already authorised power line for CSP 7, 8 and 9.		The current grid does not have enough capacity to evacuate power from the new proposed facilities. In terms of project DOE bid and project financing requirements, each project requires its own grid connection infrastructure. It is the Eskom grid. The Eskom's decision to choose the point of connection per project into the Eskom grid. The developer is being pre-active by identifying potential points of grid integration and continuing with the EIA processes prior to obtaining a preferred bidder status. Various power line alternatives are therefore currently being investigated, but not all of them will be constructed.
42.	<p>Will the developer use the same water abstraction point from Ilanga 1 for these projects?</p> <p>The vegetation type along the Orange river is considered vulnerable and thus it would be preferred if the developer can use the same abstraction point. The report stated that the vegetation type supports the rare and protected <i>Euclea pseudebenus</i> which was not mentioned in the Ecology report. Kindly note <i>E. pseudebenus</i> is listed as 'protected' under the NFA and may not be damaged or disturbed without a NFA License. This needs to be confirmed during the site visit for the EIA phase and included when applying for a Forest Act Licence.</p>	<p>Jacoline Mans Chief Forester: NFA Regulation</p> <p>Department of Agriculture, Forestry and Fisheries</p> <p>Meeting: 18-02-2016</p>	<p>The developer proposes the installation of a new abstraction point along the Orange River as well as the construction of a pipeline that will be approximately 4-6km in length. The option of using the existing abstraction point as proposed for use by Ilanga CSP 1 is however also being considered. Both options will be assessed in the EIA.</p> <p>The Aquatic Scoping Assessment was undertaken at a desktop level and the vegetation types will be confirmed once the specialist has undertaken the field assessment. The relevant NFA licenses will be applied for should <i>E. pseudebenus</i> be disturbed during construction.</p>
43.	We strongly disagree with the statement that states that the cumulative impacts on protected trees "will likely be regarded as low".		It should be noted that this comment refers to the Scoping Report for CSP 7. The response to this comment is therefore provided in the Comments and Responses Report for CSP 7.

No.	Issue	Issue Raised By	Response
			It must be noted that the Scoping Report for CSP 9 states that the cumulative impacts on protected tree species is considered to be potentially significant.
44.	The area is quite pristine, and the amount of trees to be impacted will increase substantially. We acknowledge that, the development is situated within a Renewable Energy Development Zones (REDZ), however, the REDZ were developed based on desktop studies and not ground-truthing.	Samantha De la Fontaine District Ecologist Northern Cape Department of Environment and Nature Conservation Meeting: 18-02-2016	In addition to being classified as a REDZ (REDZ 7) for Solar Development through the strategic environmental assessment undertaken for renewable energy development by the DEA, the area where the project is proposed to be located, is also designated as a Solar Corridor in terms of the Provincial Spatial Development Framework. However, regardless of this, cumulative impacts will be assessed within the EIA as required by the EIA Regulations.
IMPACTS TO ESKOM INFRASTRUCTURE			
45.	The developments do not seem to have a direct impact on existing or future planned Eskom Transmission infrastructure, however please find attached requirements for developments at or near Eskom infrastructure.	John Geeringh Senior Consultant Environmental Management Eskom Email: 10-02-2016	Eskom's requirements for works at or near Eskom infrastructure is noted. The information received from Eskom has been provided to the project developer.
ISSUES RAISED BY LANDOWNERS			
46.	Who will be developing these projects?	Nestor Sterling Strauss	Emvelo Eco projects (Pty) Ltd, an independent power producers (IPP), will develop the proposed projects.
47.	What sensitivities are present on the proposed sites?	Adjacent Landowner /	The sensitivities identified for the sites at a Scoping level are as follows:

No.	Issue	Issue Raised By	Response
		Trustee Newhaven Trust Farm Vaal Koppies 62/40 & 8/40 Meeting: 15-02-2016	<ul style="list-style-type: none"> The largest portion of the proposed development footprint area is covered by natural Bushland Arid Grassland (Medium-High Sensitivity). There are a few tributaries of a larger ephemeral drainage system originating within the western and southern half of the proposed site. These tributaries are classified as Very-High Sensitivity.
48.	How will these towers influence the rainfall in the surrounding area, as well as on my farm? The concentrated heat from the towers cause a dry spell in the surrounding area.	Mr T.J Eksteen Adjacent Landowner Boerdery BK Farm Trooilaps Pan 7/53 Meeting: 15-02-2016	There is no scientific evidence that CSP plants have an impact on rainfall patters in a region. This issue will be considered further by the EIA team and more detail in this regard will be included in the detailed assessment.
49.	The main concern would be the visual impacts and the impact these developments would have on the area's sense of place. We go out to the farm to get away from the city and developments. We go there for the natural aspect. These developments will negatively affect the game farming and hunting activities that we have on the farm.	Johan van der Merwe Future Labour Solutions cc - Member Farm Trooilaps Pan RE/53 Meeting: 15-02-2016	The Scoping Report acknowledges that visual impacts are expected to relate largely to intrusion due to the nature of the proposed development. It should be noted that the development is not expected to significantly alter the visual impact already associated with the development of parabolic trough facilities on already authorised sites within the area. A Visual Impact Assessment (VIA) will be undertaken in the EIA phase of the proposed project to assess the potential impact in detail and to recommend appropriate mitigation measures.

No.	Issue	Issue Raised By	Response
50.	Where will the water come from?		The developer plans to abstract water required for the project from the Orange River. A pipeline of approximately 25km in length will supply the project with water abstracted from the Orange River. Other options such as obtaining water from the municipality and ground water will be investigated in the EIA.
51.	An increase in stock theft is a major concern. The farm's fences will not prevent intruders from entering the premises.		Comment noted, the appropriate mitigation measures to be implemented to reduce the risk of stock theft will be presented in the EIA report through the social impact assessment..
52.	Why were these specific areas chosen for the solar developments?		<p>From a local perspective, the site has specifically been identified by Emvelo Eco Projects as being highly desirable for the development of a CSP Project due to its suitable topography (i.e. in terms of slope and local topography), site access (i.e. to facilitate the movement of machinery during the construction phase and operations staff in the long-term), land availability (i.e. the land is secured for the intended use), the extent of the site (i.e. the land parcel is able to accommodate the 700 ha required for the facility), and enabling optimal placement of the infrastructure considering potential environmental sensitivities or technical constraints, as well as the consolidation of renewable projects within an already identified node.</p> <p>In addition, the area has been classified as a REDZ (REDZ 7) for Solar Development through the strategic environmental assessment undertaken for renewable energy development by the DEA. The area where the project is proposed to be located is also designated as a Solar Corridor in terms of the Provincial Spatial Development Framework.</p>

No.	Issue	Issue Raised By	Response
53.	There is a mountainous area on the farm which will block off most of the visual impacts caused by the proposed CSP tower and trough facilities.	Andre Burger, Jaco Burger and Koos Burger Adjacent	It is noted that it is unlikely that the occupiers of farm Ezelfontein 1/50 would experience any impacts resulting from the proposed CSP facilities since the site is blocked-off by a mountainous area on their farm.
54.	How do the impacted landowners feel about the projects?	Landowners Farm Ezelfontein 1/50	Emvelo Eco Projects are in the process of either buying or leasing the farms where the solar facilities will be located. The affected landowners are generally supportive of the proposed projects.
55.	Can the developer force the landowners to sell their farms?	Meeting: 15-02-2016	No the developer cannot force landowners to sell their properties.
56.	Has the developer bought the land where the projects are located or do they only lease the land?	Jacobus Spangenberg Adjacent Landowner Trooilaps Pan 15/53 Meeting: 18-02-2016	The developer is the registered property owners for farm Matjesriver 3/41 and farm Lot 944 Karos Settlement. Emvelo are in the process of purchasing farm Matjesrivier 2/41 and farm Matjesrivier RE/41. Farm Trooilpas Pan 4/53 is planned to be leased from the landowner.
57.	Dust from the construction of Ilanga 1 already has an impact on us as the wind blows the dust towards our farm. The new projects will increase this dust impact.	Ellewee van Zyl Adjacent Landowner Erf 943 Karos Settlement and Rooidraai RE/49	The Scoping Report states that the potential impact relating to dust is expected to be negative, probable, short term with a moderate intensity and have a low significance. It should be noted that the construction of Ilanga 1 will be completed by the time construction for CSP 7 commences. There is therefore not expected to be an increased dust impact. However, these impacts will be assessed in the EIA phase and the appropriate dust mitigation measures will be recommended in the EIA Report and EMPr.
58.	There Will definitely be an increase in traffic.		The construction phase will result in a number of trucks and construction vehicles accessing the site for the duration of

No.	Issue	Issue Raised By	Response
			<p>the construction phase, which anticipated to be approximately 36 months per CSP facility. Impacts associated with increased traffic will be assessed in the Social Impact Assessment that forms part of the EIA report.</p>
59.	Will the developer change the position of fences?		<p>Existing farm fences will not be affected by the project. Emvelo Eco Projects will however fence off each CSP site.</p>
60.	Will the temperature in the area increase from the solar developments? Will this affect the rain?		<p>There is currently no scientific evidence to prove whether CSP developments will impact rainfall. This issue will be considered further by the EIA team and more detail in this regard will be included in the detailed assessment.</p>
61.	Dust is currently the biggest issue that will affect us. These developments will also have a visual impact as the CSP tower facilities are visible from many kilometres away.		<p>The Scoping Report states that the potential impact relating to dust is expected to be negative, probable, short term with a moderate intensity and have a low significance. These impacts will be assessed in the EIA phase and the appropriate dust mitigation measures will be recommended in the EIA Report and EMPr.</p> <p>The Scoping Report acknowledges that visual impacts are expected to relate largely to intrusion due to the nature of the proposed development amongst a natural setting. It should be noted that the development will not significantly alter the visual impact already associated with the development of these types of facilities on already authorised sites within the area. A Visual Impact Assessment (VIA) will be undertaken in the EIA phase of the proposed project and the appropriate mitigation measures will be recommended.</p>
62.	How will the developer access the project sites? Will they definitely build their own road?	Johan Steenkamp Adjacent Landowner	<p>The developer proposes the construction of a new access road from the N10 onto the Farm Matjesrivier RE/41 to access the sites. Environmental impacts associated with</p>

No.	Issue	Issue Raised By	Response
			this proposed access road will be assessed within a separate Basic Assessment process.
63.	What are the chances of the developer extending the projects?	Trooilaps Pan 2/53, 3/53, 8/53 and 14/53	<p>The maximum size CSP plant allowed by the DOE is a 150MW. It's unlikely that the developer will at a later stage increase the footprint.</p> <p>CSP plants have a lifespan of up to 40 years, it is likely that an extension of the PPA for an additional 20 years will be at a later stage.</p>
64.	<p>Myself and farmers in the area have four major concerns with the proposed developments;</p> <ol style="list-style-type: none"> 1) Water- these developments impacting the farmers water supply 2) Safety and security – increasing the risk of theft and poaching 3) Roads- deteriorating the existing roads 4) The CSP towers will also have a visual impact and impact the areas sense of place. 		<ol style="list-style-type: none"> 4) It is proposed that water be abstracted from the Orange River. A water use license application will be submitted to the Department of Water and Sanitation as required. Other options such as obtaining water from the municipality will be investigated in the EIA. 5) Impacts relating to safety and security will be investigated in the EIA phase of the process. Impacts can potentially be mitigated through fencing of the site and having access controlled entrances and exists. The Social Impact Assessment will recommend the appropriate mitigation measures to address safety and security concerns. 6) The developer proposes the construction of a new access road from the N10 onto the Farm Matjesrivier RE/41 to access the sites. 7) The Scoping Report acknowledges that visual impacts are expected to relate largely to intrusion due to the nature of the proposed development. It should be noted that the development will not significantly alter

No.	Issue	Issue Raised By	Response
			<p>the visual impact already associated with the development of these types of facilities on already authorised sites within the area. A Visual Impact Assessment (VIA) will be undertaken in the EIA phase of the proposed project and the appropriate mitigation measures will be recommended.</p>
65.	Do the landowners have a choice between leasing and selling of their farms?		Yes. The developer will negotiate with the landowners in this regard.
66.	When does the developer intend starting the developments?	<p>Sonya Hofmann Impacted Landowner Farm Matjesrivier 2/41 Meeting: 19-02-2016</p>	<p>The developer plans to bid these projects into future rounds of the DoE's REIPPP Programme. Construction will commence once the project receives Preferred Bidder Status from the DOE and it has successfully reached Financial Close.</p>
67.	There is a ridge/dunes within site CSP 9 area that might prohibit some of the development.	<p>Marius Spangenberg Adjacent Landowner</p>	<p>Sensitive areas such as ridges or dunes will be avoided by the development as per recommendations from the specialist studies once they have verified the site through a site visit.</p>
68.	My only concern is the access road to my farm which is located along the border of Farm Trooilaps Pan 4/53 and Farm Trooilaps Pan 20/53. As long as the access road is still available and the project will not impact on the road it should be fine. Will the access road to CSP 9 also be the access road off the N10?	<p>Trooilaps Pan 17/53 Meeting: 19-02-2016</p>	<p>A small portion of the CSP 9 development footprint was proposed to be located on the north western corner of farm Trooilaps Pan 20/53. The inclusion of this portion would affect access for this landowner. The developer subsequently reduced the development footprint of CSP 9 to exclude the farm Trooilaps Pan 20/53. There will therefore be no impact on this access road.</p>

No.	Issue	Issue Raised By	Response
			The main access road for all the Karoshoek Solar Valley Developments will be located off the N10 and pass through Farm Matjesrivier RE/41.
69.	How far are you with the environmental process?	Ella Swanepoel Impacted Landowner Matjesrivier RE/41	The Scoping Reports are currently available for public review. I&APs were required to submit their comments on the report by 22 February 2016. The EIA phase will only commence once the Plan of Study has been approved by the Department.
70.	Will the local community benefit?	Meeting: 19-02-2016	Socio-economic benefits could accrue through job creation (primarily lower skilled levels) during the construction phase. The local community could thus benefit in this regard.
71.	Where will the electricity generated go to?		The purpose of each proposed CSP facility will be to export the generated power into the Eskom National electricity grid.
72.	How high will the tower facilities be?		Each tower facility is likely to be approximately 270m high. This is of relevance to site 7 and 8.
73.	Are you doing the same studies for all the projects?		The linear infrastructure (including power lines, a pipeline and roads) will be assessed under a separate environmental authorisation application process and will therefore have separate studies undertaken. The process for all CSP facilities under consideration is the same and therefore included the same type of specialist studies.
74.	When will be the next bidding round take place?	Jacob Barend Maree Impacted Landowner TN Howorth Trustee Meeting: 19-02-2016	It is anticipated that Bidding Round 5 will take place between August and October 2016.

No.	Issue	Issue Raised By	Response
75.	What access road will they use to access the proposed sites?	Nonnie van Vuuren Adjacent Landowner Farm Ezelfontein RE/50 Meeting: 19-02-2016	The main access road for all the Karoshoek Solar Valley Developments will be located off the N10 and pass through Farm Matjesrivier RE/41.
76.	Is there a possibility for the developments to extend to the east in the direction of our farm?	Waldo Nel (WN) Adjacent Landowner Farm Ezelfontein RE/50	The sand dunes and drainage lines that are located on Farm Lot 944 Karos Settlement and Farm Trooilaps Pan 17/53 would prevent any new developments in that area. The developer would need to have an agreement with the landowners of Trooilaps Pan 20/53 if they would want to develop any solar facilities on their farm.
77.	How long will it be before construction would start?	Meeting: 19-02-2016	The project is currently in the Scoping Phase of the Environmental Impact Assessment. The developer intends to bid the project under the DoE's REIPPP Programme. The project will only be constructed once the project receives Preferred Bidder Status from the DoE. It could take approximately 2 – 3 years before the project is constructed.
78.	Would the EIA process start again if another client wants to develop on the property?	Nonnie van Vuuren Adjacent Landowner Farm Ezelfontein RE/50	A new EIA process would be required to be undertaken for any new developments on the property; however, agreements would first need to be in place with the relevant landowners.
79.	Will these CSP developments increase temperature in the area and reduce rainfall in nearby areas?	Waldo Nel (WN) Adjacent Landowner	There is no scientific evidence available that CSP facilities have an effect on climate and rainfall. This issue will be considered further by the EIA team and more detail in this regard will be included in the detailed assessment.

No.	Issue	Issue Raised By	Response
80.	Will the power generated be for the local community?	Farm Ezelfontein RE/50 Meeting: 19-02-2016	The generated electricity will be evacuated into Eskom's National grid network.
81.	Will the workers be travelling every day to the site or will there be a labour camp? There is a concern of theft in the area.		Employees will be transported by buses to the site daily. A labour camp will therefore not be required. There will be measures put in place to control access onto the sites.
82.	Once the project has commenced, and then an issue comes up, is there something in place so that the landowners may object and stop the construction?		A grievance procedure will be implemented. A Community Liaison Officer will be appointed during the construction phase. A method of communication will be implemented whereby procedures to lodge complaints are set out in order for the local community to express any complaints or grievances during the construction of the projects.
83.	Does the developer need to use local people for employment or will they bring people into the area?		A certain percentage of the employees would need to be sourced from the local area, as per the DoE requirements. Primarily low skilled and semi-skilled personnel will come from the local area. Skilled personnel may need to be brought into the area.
84.	There is a mountainous area between our farm and the proposed developments so I do not think these developments will have much of an impact on us.		It is noted that it is unlikely that the occupiers of Farm Ezelfontein RE/50 would experience any impacts resulting from the proposed CSP facilities since the site is blocked-off by a mountainous area on their farm.
PROJECT TIMEFRAMES			
85.	When is the developer planning to BID the project to the DoE? Are all three projects going to be bid?	Shaun Cloete Environmental Officer Department of Water and Sanitation Meeting: 15-02-2016	The developer intends on bidding each project in to the Department of Energy's (DoE) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme Round 5 Bid Window later this year or into subsequent rounds. It is the intension of the developer to id all projects in the coming Bid window.

No.	Issue	Issue Raised By	Response
86.	When are they planning to bid the projects?	Teresa Scheepers Municipal Manager !Kheis Local Municipality Meeting: 18-02-2016	The developer intends on bidding each project in to the Department of Energy's (DoE) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme Round 5 Bid Window later this year or into subsequent rounds.
87.	How long does it take to develop these projects?	Johan van der Colff Impacted Landowner Trooilaps Pan 20/53	The construction phase for each CSP facility is approximately 30 to 36 months.
WATER USES AND WATER USE LICENSE APPLICATION PROCESS			
88.	The developer will require a non-binding water availability letter which needs to be applied for as part of the DoE bid requirements. In addition, the developer will require the acknowledgement of receipt of the water use license.	Shaun Cloete Environmental Officer	The developer will submit an application for a water use license as required. It is noted that the applications will be acknowledged by the Department of Water and Sanitation (DWS) for bid compliance purposes.
89.	How much water will be required during construction and operation phases?	Department of Water and Sanitation Meeting: 15-02-2016	Approximately ~240 000m ³ /annum of water will be required during the 30 to 36-month construction for each facility, and approximately ~300 000 to 400 000m ³ /annum of water will be required during the operations phase per project. Separate water use licences will be applied for each facility.
90.	The DWS will need the designs for the evaporation ponds.		The preliminary designs for the evaporation ponds will be submitted as part of the water use license application.
91.	Will access roads / pipelines / power lines cross drainage lines? The developer should avoid construction near drainage lines. Please note that the DWS requires a 100m buffer around the drainage lines and not 32m.		Drainage lines have been identified as sensitive areas within the scoping study and will be avoided as far as possible. An ephemeral drainage line, flowing in an east to west direction was identified, bordering the northern section of the proposed development footprint area. This drainage line

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			connects to a larger drainage system to the west of the site (flowing in a south to north direction). A small tributary of a smaller drainage system extends into a small portion of the proposed development footprint area (to the north). Section 21(c) & (i) water uses will be applied for if required. It is noted that a 100m buffer area is required by the DWS.
92.	Will a water reservoir be constructed or will it be a steel container? This information will be relevant for the water use license.		The types of water reservoirs to be used will be confirmed in the EIA report. The relevant information required for the water use license will be provided by the applicant.
93.	Will the waste water be heated?		Wastewater will be released from the power generation process and may therefore be heated.
94.	The developer must indicate what kind of ablution facilities will be provided on site during the construction and operation phases of the project. Will a septic tank system be used or will the developer install an effluent processing plant on the site? These details must be included in the water use license application.		It is likely that portable toilets will be used during the construction phase and that a septic tank system will be installed for the operation phase.
95.	A geohydrological report will need to be submitted with the water use license application.		Comment noted, a geohydrological study will be undertaken as part of the water use license application process once the final positioning of all infrastructure has been determined. The report will be submitted by the developer as part of the water use license application.
COMMENTS RECEIVED FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
96.	This Department has the following comments on the abovementioned application: <ul style="list-style-type: none"> i. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. ii. If the activities applied for in the application form differ from those mentioned in the final SR, an 	Mmamohale Kabasa Case Officer and Sabelo Malaza Chief Director: Integrated Environmental Authorisations	<ul style="list-style-type: none"> i. All relevant listed activities associated with the development of the Ilanga CSP 7 have been applied for in an application for Environmental Authorisation which has been submitted to the National Department of Environmental Affairs on 27 January 2016. All listed activities have been described and linked to the specific development activities associated with the proposed CSP facility

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	<p>amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link: http://www.environment.gov.za/documents/forms</p> <p>iii. Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014.</p> <p>iv. The final SR must include a comments and responses report.</p> <p>v. The EAP must provide detailed motivation and reasons on the applicability of Item 14 of GN R.983 and 6 of GN R. 984. In addition, the impacts, and any specialist study to assess the impacts for these activities must be provided in the draft EIAR.</p> <p>vi. GN R.983 Item 19: With regards to infilling and excavation of watercourses for the construction of the CSP Energy facility, this Department requires the applicant to provide an indication of the preferred and alternate locations from which the</p>	<p>Department of Environmental Affairs</p> <p>Letter: 29-02-2016</p>	<p>in Chapter 4, Section 4.1 of the Final Scoping Report.</p> <p>ii. The activities applied for in the application form correspond with the listed activities mentioned in Chapter 4, Section 4.1 of the Final Scoping Report, and amendment to the application is not required at this time.</p> <p>iii. All issues raised and comments received during the 30-day public review period (22 January 2016 – 22 February 2016) have been included and addressed in the Final Scoping Report where required. All comments received and associated responses are included in the comments and responses report (refer to Appendix C8 of this Final Scoping Report). All comments received are included in Appendix C6 of the Final Scoping Report. Proof of correspondence as well as proof of attempts made to obtain comments from various stakeholders is included in Appendix C4 and C5 of the Final Scoping Report. The Public Participation Process undertaken for the Ilanga CSP 9 Project Scoping phase was conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014.</p> <p>iv. All comments received and associated responses are included in the comments and responses report in Appendix C8 of this Final Scoping Report.</p> <p>v. A detailed motivation and reasons of the applicability of Item 6 of GN R. 984 are included within Chapter 4, Table 4.1. A water use license will</p>

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	<p>material used for infilling will be sourced and where excavated material will be stored and/or disposed of.</p> <p>vii. The listed activities represented in the final SR and the application form must be the same and correct.</p> <p>viii. It is noted that no activity under GN R 985 is being applied for. However, should they at a later stage be found to be applicable, an amended application form as well as written comments must be obtained and submitted to this Department confirming their applicability to the proposed development. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> <p>ix. The specialist studies conducted must be specific to each of the sites applied for. The specialist must provide recommendations and mitigation measures specific to each site and the EAP must provide mitigation measures; an assessment and recommendations for each site as well as the cumulative impacts for each of the facilities.</p> <p>x. The following activities applied for may trigger Section 19 and Section 21 of the National Water Act No. 36 of 1998: GN R. 983 Activities 12 and 19. The hydrological assessment to be conducted must also assess the impacts on the surface hydrology of the proposed development area. The terms of reference for the study must include, <i>inter alia</i> the following:</p>		<p>be applied for, for the discharge of wastewater to the evaporation dams as required.</p> <p>vi. The preferred and alternate locations from which the material used for infilling will be sourced and where excavated material will be stored and/or disposed of will be described and assessed during the EIA phase of this project.</p> <p>vii. The listed activities represented in the final SR and the application form are the same and correct.</p> <p>viii. Comment noted.</p> <p>ix. Comment noted. The specialist studies will be specific to each of the sites applied for. The specialist will provide recommendations and mitigation measures specific to each site. Savannah will provide mitigation measures; an assessment and recommendations for each site as well as the cumulative impacts for each of the facilities.</p> <p>x. A hydrological assessment which will include: identification and sensitivity rating of all surface water courses for the impact phase of the proposed development; identification, assessment of all potential impacts to the water courses and suggestion of mitigation measures; and, recommendations on the preferred placement of the facility and all associated infrastructure and preference must be provided to the avoidance of watercourses on the property, will be included in the EIA Report as required.</p> <p>xi. Confirmation of water availability will be provided for in the EIA Report once the applicant has consulted the DWS.</p>

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	<ul style="list-style-type: none"> • Identification and sensitivity rating of all surface water courses for the impact phase of the proposed development; • Identification, assessment of all potential impacts to the water courses and suggestion of mitigation measures; and, • Recommendations on the preferred placement of the facility and all associated infrastructure and preference must be provided to the avoidance of watercourses on the property. <p>xi. It is imperative that a reliable water source is secured for the success of this project. The Department requests proof of availability of water for the facility from the relevant authority.</p> <p>xii. The final SR must provide a comparative analysis for alternative water sources for the proposed development. The preferred water source alternative must further motivate the preferred technology choice for the facility.</p> <p>xiii. A cumulative assessment must be undertaken for the sourcing of water as there are numerous other facilities in the region.</p> <p>xiv. Should a water abstraction point in the Orange River and a pipeline to pipe the water to the facility be required, the impact of these must be assessed.</p> <p>xv. The Department requires a cumulative impact assessment to be undertaken in the final SR to determine potential fatal flaws.</p>		<p>xii. All identified water source alternatives are described and included in Chapter 3, Section 3.4 (page 42) of the Final Scoping Report.</p> <p>xiii. A cumulative assessment for the sourcing of water will be undertaken during the EIA phase of the project.</p> <p>xiv. The impacts of abstracting water from the Orange River have been described and evaluated and are included within Chapter 6, Section 6.4 to 6.6 as well as Appendix G of the Final Scoping Report. A detailed assessment of impacts will be included within the EIA Report.</p> <p>xv. Cumulative impacts associated with the development of the Ilanga CSP 9 Project and other proposed solar energy facilities are described and assessed in Chapter 6, Section 6.6 (page 160) of the Final Scoping Report. No fatal flaws have been identified regarding the development of the Ilanga CSP 9 Project.</p> <p>xvi. The terms of reference of the Avifaunal Assessment to be conducted must include, inter alia the following: determine the impacts that the proposed activity (including the powerline) may have on avifauna; must cover at a minimum the summer and winter seasons; the assessment must include mitigation measures to discourage the avifauna from entering the solar field as well limit nesting and breeding grounds within the solar field. In addition, the avifaunal specialist study will be expanded to include vantage point surveys as well as flight paths to consider how birds will move</p>

No.	Issue	Issue Raised By	Response
	<p>xvi. The terms of reference of the Avifaunal Assessment to be conducted must include, <i>inter alia</i> the following:</p> <ul style="list-style-type: none"> • Determine the impacts that the proposed activity (including the powerline) may have on avifauna; • Must cover at a minimum the summer and winter seasons; • The assessment must include mitigation measures to discourage the avifauna from entering the solar field as well limit nesting and breeding grounds within the solar field. • The avifaunal specialist study must be expanded to include vantage point surveys as well as flight paths to consider how birds will move through the property. The study must also propose adequate mitigation measures to reduce the facilities impacts on avifauna frequenting the area. • Assess the cumulative impact on avifauna within the site and within the local area. <p>xvii. An Agricultural Specialist Study must be conducted. The terms of reference for the study must include, <i>inter alia</i>, the following:</p> <ul style="list-style-type: none"> • Assessment of the loss of agricultural land; • The current state of agricultural activities on land; • The impact of the loss of agricultural land within the property as well as the cumulative impact of the loss of 		<p>through the property. The study will also propose adequate mitigation measures to reduce the facilities impacts on avifauna frequenting the area. The study will also assess the cumulative impact on avifauna within the site and within the local area. The avifaunal impact assessment will be included in the EIA Report.</p> <p>xvii. An Agricultural Specialist Study was conducted as part of the Scoping Phase and is included as Appendix J of the Final Scoping Report. From this study it is concluded that the potential of the site is very low and that no impact on agriculture is expected. Further assessment is therefore not required.</p> <p>xviii. All in-house specialists used for the specialist studies were peer reviewed by external specialists (refer to Appendix D-1 and K-1 for confirmation of peer review).</p> <p>xix. Appendix 2 of GNR 982 has been considered and details in this regard are included in Table 1 (page iv). Each chapter contains a table outlining the Appendix 2 requirements that are included in each chapter.</p> <p>xx. All identified alternatives are described and included in Chapter 3, Section 3.4 of the Final Scoping Report. The alternatives considered in the scoping phase includes the following i) site alternatives, ii) layout and design alternatives, iii) technology alternatives iv) water source alternatives, v) the 'do-nothing' alternative. The advantages and disadvantages that the development will have on</p>

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	<p>agricultural land on the site and within the area.</p> <p>xviii. <u>Should in-house specialists be used for any specialist study, the specialist study must be peer reviewed by external specialists.</u></p> <p>xix. This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternative and preferred sites.</p> <p>xx. Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.</p> <p>xxi. A significant amount of materials and equipment will be delivered to the site during the construction phase of the development. A traffic assessment study must be done. The study must determine the specific traffic needs during the different phases of implementation.</p> <p>xxii. In accordance with Appendix 2 of the EIA Regulations 2014, the details of-</p>		<p>the environment and the community is included throughout Chapter 3 of the Final Scoping Report.</p> <p>xxi. The impacts on traffic are described and assessed within Chapter 6, Section 6.4 and Appendix K of the Final Scoping Report.</p> <p>xxii. The details of the Environmental Assessment Practitioner and expertise to conduct the Scoping and EIA Phases are included in Chapter 1, section 1.4, as well as Appendix A of the Final Scoping Report.</p> <p>xxiii. The Final Scoping Report was compiled in accordance with Appendix 2 and Regulation 21 (1) of the EIA Regulations, 2014.</p> <p>xxiv. The Final Scoping Report has been submitted within the required timeframes of the EIA Regulations 2014.</p>

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	<p>i. The EAP who prepared the report; and ii. The expertise of the EAP to carry out the Scoping and Environmental Impact assessment procedures; must be submitted</p> <p>xxiii. You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations, 2014.</p> <p>xxiv. Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24 F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by this Department.</p>		
SOCIO-ECONOMIC IMPACTS			
97.	In terms of local employment opportunities, please explain how the 50km radius works?	Cllr James Moya Ward Councillor Ward 14	The proposed projects will be bid into the DoE's REIPPP Programme. The DoE stipulated that a certain percentage of employment opportunities have to be sourced from the local area. The local area can be defined as the area within a 50km radius from the development. It would be beneficial

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		//Khara-Hais Local Municipality	to employ people that are located as close to the project as possible.
98.	To ensure that no conflict arises, we make sure that people are sourced from all four communities. My request to Savannah Environmental is that Emvelo Eco Projects should recognize ward leaders and keep them involved in the process as these leaders can assist with solving social conflicts.	Meeting: 18-02-2016	The request to consult the relevant ward structures regarding procurement and employment is noted by the applicant.
99.	Please let the ward leaders know when they are planning to start the developments. It is important that the developer and contractors contact me and involve me throughout the entire labour process; as I know what labour is available in Ward 14 and can assist in controlling social conflicts. The main thing is utilising as much labour as possible from Ward 14 as well as source other services and materials required for the project from ward 14 in order to benefit the local community as far as possible.		
100	Will only one ward benefit, or will the entire !Kheis Municipality benefit?	Samuel Esau Ward Councillor – Ward 2 !Kheis Local Municipality	Employment opportunities and socio-economic development opportunities will be available for the local communities within a 50km radius from the project area. A Social Development Framework will be drafted as it is one of the requirements from DOE. It is therefore ensured that maximum social benefit is achieved for surrounding municipalities inclusive of the !Kheis Municipality.
ROADS AND TRAFFIC IMPACTS			
101	What is the plan in terms of safety on the road? Especially referring to the curve in the road. Can you give us an expected date for the realignment of the N10 road? The roads used for Site 3, 4 and 5 also need safety in place.	Cllr James Moya Ward Councillor Ward 14 //Khara-Hais Local Municipality	An environmental authorisation for the realignment of the N10 to facilitate access to the Ilanga CSP site (DEA Ref: 14/12/16/3/3/2/763) was received from the Department of Environmental Affairs on 22 September 2015. The realignment of the portion of the N10 road will commence

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		Meeting: 18-02-2016	shortly. This realignment of the N10 Allows for improved safety of users of the N10.
102	Will the access roads be tarred?	Teresa Scheepers Municipal Manager !Kheis Local Municipality Meeting: 18-02-2016	The access road will be tarred.
103	What road is the developer planning to use to access the site?	Gog van der Colff Impacted Landowner Trooilaps Pan 20/53	The developer plans to construct a new road from the N10 within the farm Matjesrivier 2/41.
VISUAL IMPACTS			
104	The towers will be visible for only certain parts of the road. The dust would not really have an effect on many people. The operational phase will have high visual impacts from the towers.	Teresa Scheepers Municipal Manager !Kheis Local Municipality Meeting: 18-02-2016	The Scoping Report acknowledges that visual impacts are expected to relate largely to intrusion due to the nature of the proposed development. It should be noted that the development will not significantly alter the visual impact already associated with the development of parabolic trough facilities on already authorised sites within the area. A Visual Impact Assessment (VIA) will be undertaken in the EIA phase of the proposed project and the appropriate mitigation measures will be recommended.
IMPACTS ON AVIFAUNA			
105	Thank you for the opportunity to comment on the above report. Since the proposed developments are located close to one another and the impacts and issues are likely to be	Simon Gear Policy & Advocacy Manager	BirdLife South Africa's solar energy draft guidelines are noted. It is noted however that these are still in draft form

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	<p>similar, we have chosen to comment on all three applications together.</p> <p>Please note that BirdLife South Africa has had solar energy guidelines since 2012 (see attached). These guidelines relied largely on the avifaunal specialist to guide the scope of the assessment and are undergoing a substantial update (see attached) to provide more clarity. While the updated guidelines have not been finalised, we encourage environmental assessment practitioners to familiarise themselves with the updated version and use them to guide the scope of impact assessments.</p> <p>BirdLife South Africa supports the responsible development of renewable energy. One of the challenges is that limited information is available on the impacts of solar energy facilities on birds, particularly CSP. However, the presence of CSP can have direct impacts on avifauna by killing or injuring birds that collide with heliostats or with associated infrastructure. Birds may get burned at CSP facilities when they fly through concentrated beams of solar flux. CSPs could also impact birds indirectly by destroying or degrading large areas of habitat and displacing sensitive species. The presence of red-listed species such as Black Harrier, Lanner Falcon and Kori Bustard need to be looked into consideration. Considering that less than 1000 pairs of Black Harriers are left in South Africa.</p> <p>Poorly surveyed sites during scoping phase could result in limitations to the study. Thus, a single site visit will not allow for seasonal variation in the composition and</p>	<p>and Mmatjie Mashao Birds and Renewable Energy Intern BirdLife South Africa Letter: 24-02-2016</p>	<p>and have not been adopted. It is therefore questionable whether these can be implemented.</p> <p>The comments and concerns regarding the potential impacts of CSP facilities, bird mortalities and habitat loss are noted. An avifaunal specialist study including fieldwork will be undertaken during the EIA phase. The presence of species of concern such as the Black Harrier, Lanner Falcon and Kori Bustard will be evaluated.</p> <p>The request to extend the survey beyond the development footprint will be considered in the EIA phase.</p> <p>It must be noted that the avifaunal assessment will be conducted of a summer and winter seasons as required by the Department of Environmental Affairs. The avifaunal impact assessment will be made available for public review during the EIA phase.</p> <p>The design and location of evaporation ponds relative to all projects (Ilanga CSP 7, 8 and 9) of the development will be assessed as part of the EIA phase.</p> <p>The avifaunal desktop assessment acknowledges that the Orange River may attract water bird species that may cause mortality when birds fly thorough concentrated beams of solar flux. This potential impact will be further assessed through the impact assessment studies. Appropriate bird deterrent measures will be recommended by the specialist and contained within the EMPr.</p>

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	<p>behaviour of the local avifauna. Therefore, we suggest that due to the presence of potentially affected species, surveys should be extended beyond the development footprint.</p> <p>Solar energy guidelines suggest that all CSPs should conduct at least 12 months' preconstruction monitoring to include all seasons of the year. The variable rainfall in the region means that there are likely to be significant differences in bird communities. Pre-construction monitoring results will be used to determine if the project should proceed, what measures are necessary to avoid, minimize and mitigate the impacts of the project, and the nature and extent of construction-phase and post-construction monitoring. Since Ilanga 1 is still under construction, we would like to know what monitoring plans are in place there, and whether pre-monitoring results at Ilanga CSP 7, 8 and 9 can be shared with us and made available to the public.</p> <p>We are happy to see that you have mentioned the planned construction of evaporation ponds at the proposed development site. Evaporation ponds could be designed to provide habitat for some bird species in this arid environment. While this may benefit some species, it could also pose a threat to birds if the water is contaminated. It may also present a risk if birds are attracted to the area as they may be vulnerable to colliding with the heliostats, or being burned by solar flux. The most appropriate design and location of ponds relative to all phases of the development should be assessed in the EIA.</p>		<p>The concern regarding cumulative impact of displacement, particularly for red-listed species and species with restricted range is noted. Collaboration with other developers/operators will be considered by the developer.</p> <p>With regards to Ilanga I, the Environmental Authorisation does not include any requirements for bird monitoring on the site, however, monitoring will be implemented as part of best practice.</p>

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	<p>Another concern is that the Orange River arcs around the site, as is raised in the avifaunal assessment report. The river may bring in water bird species and that may cause mortality when birds fly through the concentrated beams of solar flux.</p> <p>The proposed development is situated close to other facilities around the area. Therefore, the cumulative impact of displacement is a concern, particularly for red-listed species and species with restricted range. Collaboration with other developers/operators of solar facilities is encouraged in the area to ensure that environmental impacts are minimised.</p> <p>BirdLife South Africa is looking forward to being kept informed as the impact assessment progresses. We are happy to get involved at all the stages of the development and help with guidance regarding any bird issues.</p>		
GENERAL			
106	How many developers are there?	Jacoline Mans Chief Forester: NFA Regulation Department of Agriculture, Forestry and Fisheries Letter: 18-02-2016	Emvelo is the main developer for the Karoshoek Solar Valley Development.

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107	Are all the properties leased from the landowners?	Samantha De la Fontaine District Ecologist Northern Cape Department of Environment and Nature Conservation Meeting: 18-02-2016	Emvelo is the registered property owners for Farm Matjesriver 3/41 and Farm Lof 944 Karos Settlement. The developer is in process of purchasing Farm Matjesrivier 2/41 and Farm Matjesrivier RE/41. Farm Trooilpas Pan 4/53 is planned to be leased from the farm owner.
108	Will there be an on-site camp for employees?	Teresa Scheepers Municipal Manager !Kheis Local Municipality Meeting: 18-02-2016	A labour camp will not be constructed on the site. Labour, specifically unskilled and semi-skilled labour, for the project will be sourced from the local communities within the vicinity of the project site. Workers will be bussed to the site each day during the construction period.