
PAULPUTS CSP PROJECT, NORTHERN CAPE

COMMENTS AND RESPONSES REPORT

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COMMENTS RECEIVED: EIA PHASE

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
I&AP REGISTRATIONS AND PUBLIC PARTICIPATION PROCESS			
1.	Can you please add me to the I&AP database for the Paulputs CSP Project?	Vered Karty Project Manager BrightSource Energy Email: 11-01-2016	Vered Karty was registered as an I&AP on the project's database.
2.	Please register BirdLife South Africa on this EIA using my details below.	Simon Gear Policy & Advocacy Manager BirdLife South Africa Email: 29-03-2016	Simon Gear of BirdLife SA was registered as an I&AP on the project's database.
ACKNOWLEDGMENT LETTERS RECEIVED FROM ORGANS OF STATE			
3.	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: TYPE: CSP PROJECT YOUR REFERENCE: PAULPUTS CSP PROJECT DESCRIPTION: PAULPUTS CSP PROJECT DATED: 2016/05/19	B N De Lange Land Use and Soil Management Department of Agriculture, Forestry and Fisheries Letter: 19-05-2016	Acknowledgment noted, no response required.

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	Please use the following reference number in all enquiries: AGRILAND REFERENCE NUMBER: 2016_05_0128		
COMMENTS RECEIVED FROM THE NATIONAL DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
4.	<p>The draft Environmental Impact Assessment report (EIAR) dated May 2016 and received by this Department on 09 May 2016 refers.</p> <p><u>This Department has the following comments on the abovementioned application:</u></p> <ul style="list-style-type: none"> i. It is noted that the exact thresholds related to the applied listed activities are not specified in the application form. For instance, the Environmental Assessment Practitioner (EAP) mentioned that “the facility will require the construction of new internal access roads within which will be wider than 8 metres”. Please ensure that all the required thresholds have been correctly specified in both the application form and the final EIAR. ii. If activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms iii. All the specialist assessments must include a cumulative environmental impact statement. Identified cumulative impacts must be clearly defined, and where possible the size of the identified 	<p>Ms Nonhlanhla Mkhwanazi Case Officer</p> <p>Department of Environmental Affairs</p> <p>Letter: 03-06-2016</p>	<ul style="list-style-type: none"> i. The application form has been amended to include relevant thresholds. ii. An amended application form will be submitted to the Department, if required following the finalisation of the EIA process. iii. Specialist assessments include a cumulative environmental impact statement. Identified cumulative impacts are defined, and where possible the size of the identified impact is indicated and quantified, i.e. hectares of cumulatively transformed land.

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	<p>impact must be indicated and quantified, i.e. hectares of cumulatively transformed land.</p> <p>iv. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology approved with the acceptance of the scoping report.</p> <p>v. The cumulative impacts significance rating must inform the need and desirability of the proposed development.</p> <p>vi. The preferred layout plan with the preferred substation, service routes, and construction camp must be indicated in the final EIAR. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map must also be included in the final EIAR.</p> <p>vii. Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative. Specifically, the solar field, power block and associated services must be removed from all sensitive areas as recommended by the specialists.</p> <p>viii. The Soils and Agricultural Study prepared by the Agricultural Research Council (ARC) Institute for Soil dated April 2016 stated that "the site was not visited during the course of this study, and so the detailed composition of the specific land types has not been ground-truthed. However, due to the very low prevailing agricultural potential, a site visit was not deemed necessary." You are requested to conduct a site visit and the findings of the site visit must inform the study to be included in the final EIAR.</p>		<p>iv. Identified cumulative impacts associated with the proposed development are rated with the significance rating methodology approved with the acceptance of the scoping report.</p> <p>v. The cumulative impacts significance rating inform the need and desirability of the proposed development (refer to Chapter 2).</p> <p>vi. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map is included in Appendix N of EIAR.</p> <p>vii. Recommendations provided by specialist reports were considered and used to inform the preferred layout alternative.</p> <p>viii. Please refer to Page 14 of the Soil and Agricultural Study (Appendix F) and Appendix Q2 for a letter from the Soil and Agricultural Specialist motivating why a site visit is not necessary.</p> <p>The Soil and Agricultural Specialist Report contained in Appendix F states "Regarding the standard requirement that a detailed soil investigation be undertaken, the following can be stated. The majority of solar power applications in this area of the Northern Cape comprise some of the lowest agricultural potential that one will</p>

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	<p>ix. It is noted by this Department that the Social Assessment conducted by Savannah was peer reviewed by an external review. Please ensure that the external peer review follows the following format:</p> <ul style="list-style-type: none"> » Acceptability of the ToR; » Is the methodology clearly explained and acceptable; » Evaluate the validity of the findings (review data evidence); » Discuss the mitigation measures and recommendations; » Evaluate the appropriateness of the reference literature; » Is the article well-written and easy to understand; and » Identify any short comings. 		<p>find anywhere in South Africa, with very hot, dry conditions and usually shallow, sandy soils with rock outcrops (which is the case with this application). A site visit would only confirm this situation. There might well be a soil erosion hazard regarding wind erosion, but that is mentioned in the report (see Table 3 and Table 4) with a range of mitigation measures specified, and a site visit would also not add significant value to that assessment. Where a specialist soil investigation for an environmental impact assessment is concerned, if there is any possibility of medium or high potential agricultural soils, or if there is any other specific situation that justifies a site visit, that would definitely be recommended in the report, but this is not the case for the Paulputs area.”</p> <p>ix. The requested format has been provided and is included in the Social Report (please refer to Appendix J)</p>

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	<p>x. It must be noted that this Department in its acceptance of SR letter requested that the avifaunal assessment must cover the summer and winter seasons. Upon review of this report, a six-day field study was conducted between August 2015 and April 2016 of which April is deemed as autumn. As such, the study must be conducted within the seasons as requested by the DEA. Futhermore, no reason or motivation was provided for the deviation from the acceptance of the SR.</p> <p>xi. The specialist studies to be conducted must comply with Appendix 6 of the EIA Regulations, 2014 and proof of compliance must be provided in the final EIAR.</p> <p>xii. In the Department's previous correspondence dated 18 February 2016, it was indicated that comments from the Department of Water and Sanitation: Impact and Resource Management Directorates must be obtained. However, proof that the comments were requested from the aforementioned Department is not provided. The EIAR must include proof that comments were requested from the Department of Water and Sanitation.</p> <p>xiii. The draft EIAR failed to include the traffic impact assessment as requested under point x of the acceptance of SR dated 18 February 2016. As such, the final EIAR must include a traffic assessment study. The study must determine the specific traffic needs during the different phases of implementation.</p> <p>xiv. The draft EIAR does not provide proof of compliance with Regulation 40, 41, 42, and 44 of the EIA</p>		<p>x. The avifaunal assessment undertaken by Adrian Hudson was peer reviewed by Rob Simmons for comment on the monitoring undertaken for the project. Please see attached Appendix Q. Rob Simmons upon review of the report states that two visits timed for August-November and March/April, as undertaken by the specialist, will record <u>resident</u> and <u>nomadic</u> birds present and breeding respectively and that summer and winter visit (as advised by the DEA) would miss both peaks and cannot be supported.</p> <p>xi. The specialist studies to be conducted must comply with Appendix 6 of the EIA Regulations, 2014 and proof of compliance will be provided in the final EIAR.</p> <p>xii. Proof that <u>the</u> comments were requested from the aforementioned Department is provided in Appendix C4.</p> <p>xiii. A traffic impact statement has been compiled and is included in Appendix Q of the EIAR</p> <p>xiv. Upon the release of the Draft EIAR the compliance with Regulations 40, 41, 42, and 44 of the EIA Regulations</p>

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	<p>Regulations 2014. Please ensure that all issues raised and comments received during the circulation of the EIAr 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 and included in the Final EIAr. Proof should be submitted to the Department of the attempts that were made to obtain comments and proof that the proposed development was advertised in at least one local newspaper.</p> <p>xv. The Environmental Management Programme (EMPr) must include a provision to audit the effectiveness of the mitigation measures and recommendations for amongst others the following: grievance incidents, waste management; alien and open space management, re-vegetation and rehabilitation, plant rescue and protection and traffic and transportation. The results must be made available to the Department and relevant competent authority on request and must be part of monitoring and audit reports.</p> <p>xvi. The EMPr must identify and indicate the applicable section of the National Heritage Act (Act 20 of 1999).</p> <p>xvii. Please note that the final EIAr must comply with all conditions of the acceptance of the scoping report signed 18 February 2016 and must address all comments contained in this comments letter.</p> <p>xviii. In terms of Appendix 3 of the EIA Regulations, 2014, the report must include an undertaking under oath or affirmation by the EAP in relation to:</p>		<p>2014 could not have been complied with because at that stage proof of compliance was not yet available. Please refer to the attached updated Appendix C which includes all issues raised and comments received to date. Please refer to Appendix C for proof of attempts made to obtain comments and proof that the proposed development was advertised in at least one local newspaper</p> <p>xv. The EMPr includes a provision to audit the effectiveness of the mitigation measures and recommendations for amongst others the following: grievance incidents, waste management; alien and open space management, re-vegetation and rehabilitation, plant rescue and protection and traffic and transportation. The requirement that that the results must be made available to the Department and relevant competent authority on request is included within the EMPr.</p> <p>xvi. The EMPr does identify and indicate the applicable section of the National Heritage Act.</p> <p>xvii. Please refer to Table 1 in the EIAr, which outlines the DEA requirements as outlined in the acceptance of the scoping report dated 18 February 2016, and where in the draft EIR the requirements have been addressed.</p> <p>xviii. Please refer to Appendix L of the EIAr which includes an affirmation by the EAP.</p>

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	<ul style="list-style-type: none"> » The correctness of the information provided in the reports » The inclusion of comments and inputs from stakeholders and I&APs » The inclusion of inputs and recommendations from the specialist reports where relevant » Any information provided by the EAP to I&APs; and, » Responses by the EAP to comments or inputs made by I&APs. <p>xix. The EIAR must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions. A sample of the minimum information required was listed under point 2 of the EIA information required in the acceptance of SR.</p> <p>xx. You are further reminded that the final EIAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of the EIAR in accordance with Appendix 3 of the EIA Regulations, 2014.</p> <p>xxi. 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>xxii. Failure to comply with the requirements of the acceptance of the SR, the comments of this letter as well as the requirements of the EIA Regulations, 2014, a negative Environmental Authorisation will be issued by this Department.</p>		<p>xix. The technical details for the proposed facility as well as their description and/or dimensions are included in a table format within Chapter 2.</p> <p>xx. Please refer to Table 1 of the EIAR</p> <p>xxi. Noted. It must be noted that a notification in terms of Regulation 23(1)(b) was submitted to the Department on 08 June 2016.</p> <p>xxii. Comment noted, no response required.</p>

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	<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		
HERITAGE IMPACTS			
5.	<p>Savannah Environmental (Pty) Ltd (Savannah) was contracted by Paulputs CSP RF (Pty) Ltd to complete an Environmental Impact Assessment (EIA) process for the Paulputs CSP Project, near Pofadder, Northern Cape Province. A Scoping Report was completed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) Regulations 2014. Savannah contracted David Morris and John Pether to conduct the Heritage Scoping Study and the Palaeontological Desktop Assessment for the project respectively. Morris, 2015. Paulputs CSP Facility near Poffadder, Northern Cape. Specialist Input for the Scoping Phase of the Environmental Impact Assessment: Archaeology.</p> <p>The author found that heritage resources from the Stone Age and Colonial/Historical periods may be present within the project area, and due to the sparse vegetation the heritage resources are likely to be highly visible.</p> <p>A grave of the Northern Border Police is known on the affected farm portion and a road-side grave is present.</p> <p>Recommendations provided in the report are as follows:</p>	<p>Natasha Higgitt Heritage Officer</p> <p>South African Heritage Resources Authority</p> <p>Letter: 15-01- 2016</p>	<p>A Heritage Impact Assessment was undertaken. Please refer to Appendix H of the EIR. The HIA includes the following studies:</p> <ul style="list-style-type: none"> » An Archaeological Impact Assessment (AIA); » An assessment of Burial Grounds and Graves; » An assessment of intangible heritage resources; and » A VIA on heritage resources is no longer required according to the specialist <p>A Fossil Finds Procedure will be included within the EMPr 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.</p>

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	<ul style="list-style-type: none"> » A site visit must be conducted to examine the proposed project area for heritage resources. » Identified heritage resources will be assessed for their significance » Nineteenth and twentieth century cultural heritage and intangible heritage values attached to places that are to be impacted by the development must be assessed during the pending EIA phase. » A Visual Impact Assessment must be conducted on identified heritage resources » Should heritage resources be uncovered during the construction phase of the project, all work in the area must cease immediately and be reported to SAHRA and/or the McGregor Museum, Kimberly. The find should be investigated by a professional archaeologist who will provide further recommendations. Should it be deemed necessary, a Phase 2 Mitigation permit must be applied for in order to conduct any sampling, excavations or collections of heritage deposit before the development can continue. <p><i>Pether, 2015. Brief Palaeontological Impact Assessment (Desktop Study). Proposed Pofadder Solar Thermal Plant. Portion 4 of the farm Scuit-Klip 92, Kenhardt District, Northern Cape.</i></p> <p>The author found that expected palaeontology in the project area includes freshwater clams and snail fossils, abraded bone fragments and loose teeth, however, due to the sporadic occurrences of fossils in the area, there is a low potential for uncovering fossil heritage. Should fossils be identified during the construction phase, they will be</p>		

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	<p>considered as significance finds due to the lack of fossil occurrences in the vicinity.</p> <p>Recommendations provided in the report include:</p> <ul style="list-style-type: none"> » Fossil Finds Procedures must be developed and implemented that details the guidelines and reporting/action protocols to be following when finds are uncovered. » The local Council of Geoscience in Upington may be utilized to contract a local geologist who will inspect excavations and liaise with the Environmental Control Officer and an advising palaeontologist. <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 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 Paulputs CSP Project. 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; » An assessment of intangible heritage resources; and » A VIA must be completed on identified heritage resources. 		

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	<p>No further palaeontological assessment is required. 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> <p>Decisions regarding Built Environment will be provided by Ngwao-Boswa Jwa Kapa Bokone (NBKB), the Northern Cape Provincial Heritage Resource Authority (Ratha Timothy - rtimothy@nbkb.org.za /053 831 2537).</p>		
6.	<p>Savannah Environmental (Pty) Ltd has been appointed by Paulputs CSP RF (Pty) Ltd to conduct an Environmental Impact Assessment (EIA) process in support of an Environmental Authorisation Application for the proposed Paulputs CSP Project, near Pofadder, Northern Cape Province. A draft EIA was conducted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations, 2014. The proposed Paulputs CSP project will consist of a field of heliostats and central receiver and will be constructed over an area of approximately 900 ha. Associated infrastructure will include a molten salt tower, power island, cabling linking the power block to the on-site substation, water supply abstraction point with filter and booster station, on-site lined ground water storage</p>	<p>Natasha Higgitt Heritage Officer</p> <p>South African Heritage Resources Agency</p> <p>Letter: 06-06- 2016</p>	<p>» The specialist has confirmed the site to be a memorial and not a burial. It is recommended that these memorial markers be respected by way of a 10 m buffer zone, or if this is not possible, an agreed-upon protective measure be implemented in consultation with affected family members. As this is not a burial, and none of the sites are older than 60 years, no CMP is expected to be required.</p> <p>» As the site is confirmed as a memorial and not a burial, and none of the sites are older than 60 years, they are not governed by the NHRA. Therefore, a social consultation process in terms of section 36(5) of the National Heritage Resources Act, 1999 (NHRA) and Chapter XI of the NHRA Regulations is not required, nor</p>

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	<p>reservoir, lined evaporation ponds, water treatment plant and associated chemical store, auxiliary wet cooled chiller plant, control room and office building, workshop, access roads and overhead powerline.</p> <p>David Morris from the McGregor Museum was appointed to conduct the Archaeological Impact Assessment (AIA) for the project. <i>Morris, 2016. Archaeological Specialist Input for the Environmental Impact Assessment Phase of the EIA for the Paulputs CSP Facility, near Pofadder, NC Province</i></p> <p>According to the submitted AIA, identified heritage resources fall outside the proposed development footprint and of low significance, however, it appears that the identified road side grave (Site 6) may be located within the proposed solar field array. The remaining archaeological resources (Early Stone Age [Site 6] and Later Stone Age scatter Site 7]) are of low significance. Additionally, it has been noted that the pipeline route was surveyed previously in 2014 and that artefact densities are extremely low along the route. It must be noted that a track log of the area surveyed was not supplied.</p> <p>Recommendations provided in the AIA report include the following:</p> <ul style="list-style-type: none"> » The rocky outcrops that occur at the north eastern side of the proposed project footprint should be avoided with a 60 m buffer; » Provisions for on-going heritage monitoring in a facility environmental management plan which also provides guidelines on what to do in the event of any 		<p>is a permit in terms of section 36(3) of the NHRA and Chapter IX of the NHRA Regulation required to be obtained.</p> <p>The layout presented in the EIA Report excludes the rocky outcrops from the heliostat field. It is noted in the EMPr that should it not be possible to avoid the rocky outcrops, an archaeological walk-down must be conducted to ensure that no heritage resources will be impacted by the proposed development. It is noted that the results of the walk-down must be submitted to SAHRA for comment prior to the commencement of construction.</p> <p>It is noted in the EMPr that If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. It is noted that if unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. It is noted that a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. It is noted that if the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.</p>

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	<p>major heritage feature being encountered during any phase of the development or operation;</p> <ul style="list-style-type: none"> » Inclusion of further heritage impact considerations in any future extension of infrastructural elements; » Immediate reporting to relevant heritage authorities of any heritage feature discovered during any; » phase of development or operation of the facility; and » Officials from the relevant heritage authorities (National and Provincial) to be permitted to inspect the operation at any time in relation to the heritage component of the management plan. <p>Final Comment</p> <p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the submitted AIA and promotes the recommendations included in the report. The following additional conditions must be included in the Environmental Management Programme (EMPr):</p> <ul style="list-style-type: none"> » A buffer of 30 m must be maintained around the identified grave (Site 6). A Conservation Management Plan (CMP) must be developed for the long term in situ conservation of the burial. The CMP must be submitted to SAHRA for comment; » Should it not be possible to conserve the burial, a social consultation process in terms of section 36(5) of the National Heritage Resources Act, 1999 (NHRA) and Chapter XI of the NHRA Regulations must be conducted, thereafter a permit in terms of 		

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	<p>section 36(3) of the NHRA and Chapter IX of the NHRA Regulation may be applied for if feasible; and</p> <ul style="list-style-type: none"> » Should it not be possible to avoid the rocky outcrops, an archaeological walk-down must be conducted to ensure that no heritage resources will be impacted by the proposed development. The results of the walk-down must be submitted to SAHRA for comment prior to the commencement of construction; » If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required. 		
ECOLOGICAL IMPACTS			
7.	The Department of Agriculture, Forestry and Fisheries (DAFF) has commented on the Background Information Document (BID) in October 2015. The DAFF has studied the	Jacoline Mans Chief Forester: NFA Regulation	

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	<p>draft EIA report and would like to make the additional comments.</p> <p>COMMENTS ON THE DRAFT EIA REPORT</p> <p>1) Page 63 refers to the National Veld and Forest Fire Act, 101 of 1998 (NVFFA) and stated that according to Section 12 of the Act, "the landowner would be required to burn firebreaks..." Although s12 refers to the duty to prepare and maintain firebreaks, it does not state that such firebreaks must be burned. In fact, if a firebreak is prepared by burning, then certain rules must be followed as prescribed in the Act under s12(2). If a registered Fire Protection Association (FPA) objects to the burning of a firebreak, the owner may not burn the firebreak (s12(4)). In arid and semi-arid regions, burning of firebreaks is not recommended. It may cause too much environmental damage. It may expose soil surfaces, making it more prone to wind erosion which may aggravate desertification. In the study site, the vegetation is of such a nature that there may not be sufficient woody flammable material to sustain a controlled burn (the area is classified as a 'low veldfire risk' area). Hence other methods are preferred, such as using existing roads as firebreaks or in years of above-average rainfall, mowing a firebreak.</p> <p>2) What is important about firebreaks is that it must be prepared on the property boundary (s12(1)), unless if the owner is a member of a registered FP in which case the FPA rules apply (which may differ from what is the Act.) It is also important to take note of the definition</p>	<p>Department of Agriculture, Forestry and Fisheries</p> <p>Letter: 11-05-2016</p>	<p>1) Table 3.1 in the EIAR has been edited accordingly.</p> <p>2) Table 3.1 in the EIAR has been edited accordingly</p>

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	<p>of "landowner" under the NVFFA (see s2(1)(xiii) when interpreting responsibilities under the NVFFA.</p> <p>3) The developer should take note of section 16 of the NVFFA, which stated: "The right or duty to prepare and maintain a firebreak... prevails over any prohibition in any other law... except that the owner must-</p> <p>a. Where possible, transplant any plant which is protected in terms of any law; or</p> <p>b. Where it is safe and feasible, position the firebreak so as to avoid such plant or tree."</p> <p>4) Page 64 refers to the National Forests Act, 83 of 1998 (NFA) and stated that the relevant authorities under the NFA is DAFF and NC DENC. Kindly note that the DENC does not have a mandate under the NFA.</p> <p>5) Page 64 stated under the NFA the following: "No Protected tree species or indigenous tree species were identified on site." It might be true for protected tree species, but it is definitely not true for indigenous tree species. The specialist report refers to indigenous tree species recorded on site, <i>Parkinsonia Africana</i> and <i>Boscia foetida</i> to name but a few.</p> <p>6) Page 69 and 70 refers to Northern Cape Nature Conservation Act, 9 of 2009 (NCNCA) and the Flora Permit requirement under the NCNCA. Kindly note, a Fauna Permit may also be required under the NCNCA.</p> <p>7) The draft EIA report, under applicable legislation, did not mention the Sub-division of Agricultural Land Act 70 of 1970 (SALA). If the land is demarcated as 'agricultural land', it cannot be changed to another land use without the supported recommendation under the SALA. A local authority cannot change the zoning of demarcated agricultural land to any other zoning without a letter</p>		<p>3) Table 3.1 in the EIAr has been edited accordingly</p> <p>4) Table 3.1 in the EIAr has been edited accordingly</p> <p>5) Table 3.1 in the EIAr has been edited accordingly</p> <p>6) Table 3.1 in the EIAr has been edited accordingly</p> <p>7) The application for the rezoning from Agricultural land use to a Special land use shall be pursued once the EIA phase is completed. A valid EA is required as part of the rezoning application.</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	<p>from the Registrar of this Act. What is the current zoning of the proposed development site and was an application to change the zoning (if zoned Agriculture) submitted to the DAFF, Registrar of the SALA, for review?</p> <p>8) Page 94, number 5.3 refers to the Ecological Environment. Page 94 and 95 refers to the affected Bushmanland Arid Grassland and stated that "at a national scale this vegetation type has been transformed to a slight degree and approximately 27% is conserved in the Augrabies Falls National Park". Where did the 27% statistic come from (please provide the source)? Mucina & Rutherford (2006) indicated that the conservation target is 21% and that only small patches are conserved. Savannah Environmental draft EIA reports on the Karoshoek Solar Valley projects (i.e. Ilanga CSP2, CSP3, etc.) stated that only a small percentage of Bushmanland Arid Grassland vegetation type is conserved, with the specialist report referring to a little as 1% of this vegetation type in formal conservation areas. Please clarify.</p> <p>9) Page 133 confirmed that vulnerable <i>Aloe dichotoma</i> was recorded in the study area. The statement that <i>A. dichotoma</i> may be impacted on was repeated several times. There is currently a moratorium in place in the Northern Cape prohibiting the removal of Quiver trees from the wild (Proclamation No. 968 of 1 April 2005). It is imperative that Nature Conservation be consulted in this regard; otherwise the presence of this species on site (if affected) may result in a fatal flaw.</p>		<p>8) This statement is an error and should state that only small patches are statutorily conserved in Augrabies Falls National Park and Goegab Nature Reserve. Very little of the area has been transformed. This has been edited accordingly in the EIAr.</p> <p>9) Nature Conservation is included in the Database of I&APs (refer to Appendix C of the EIAr) and has been consulted regarding the proposed project. The area reflected as a no go area within the ecological sensitivity map (refer to Appendix A) was determined as such due to the occurrence of <i>Aloe dichotoma</i> in this area. This area cannot be developed. It is understood that the applicant will have to accommodate the identified "no go area" during planning, construction, operation and decommissioning. All locations where this species was recorded is given in Error! Reference source not</p>

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	<p>COMMENTS ON THE ECOLOGICAL IMPACT ASSESSMENT REPORT</p> <p>10) Page 13 of the specialist Ecological Impact Assessment Report, number 2.2.2.1 refers to the NFA and stated that the list of protected tree species are given under the NEM:BA TOPS list. The statement is incorrect. The TOPS list refers to species listed as Threatened or Protected under the National Environmental Management Biodiversity Act (Act No 10 of 2004). The list of protected tree species under section 12(1) of the NFA, was published in GN1161 of 20 November 2015.</p> <p>11) The report stated that <i>Aloe dichotoma</i> was recorded in the study area and that the study site falls in an Ecological Support Area (ESA), thus Nature Conservation must be consulted to determine if these two factors may derail the proposed development. It is not clear if the specimens of <i>A. dichotoma</i> can be avoided.</p>		<p>found. of the Ecological Report (refer to Appendix D of the EIAR). All individuals of this species were recorded outside of the footprint of the CSP facility and can therefore be avoided, and not affected by the development. The occurrence of this species is therefore not seen as a fatal flaw.</p> <p>10) Page 13 of the Ecology report has been corrected.</p> <p>11) The development will affect less than 30% of the width of the migration route and should have very little effect on species using this route. It must also be noted that the migration route indicated is part of a large system of migration routes and that the percentage of these migration routes that will be impacted will be negligible. It must also be noted that the migration route indicated in Error! Reference source not found. is part of a large system of migration routes and that the percentage of these migration routes that will impacted upon will be negligible (Error! Reference source not found.). According to the SANBI guidelines set for ESAs and CBAs, ESAs do not exclude development and "significant" change is allowed for biodiversity patterns</p>

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	<p>12) The specialist Ecological Impact Assessment Report did not mention the NCNCA under applicable legislation. It is definitely applicable, because of the protected plant species recorded in site such as <i>Hoodia fordonii</i> and <i>Boscia foetida</i>.</p> <p>13) Page 52 of the report refers to DAFF comments made on the Background Information Document in October 2015 and potential impacts on <i>Schotia brachypetala</i> var. <i>angustifolia</i> (see 3rd bullet, number 8.7 of page 52). Thank you for pointing it out. It was a typing error and I was actually referring to <i>Schotia afra</i> var. <i>angustifolia</i> which I know occur in the vicinity of Pofadder along drainage lines, because we often go there for seed collection. It should be avoided as far as possible.</p> <p>14) Should any unexpected NFA listed protected tree species be found on site, please apply for a Forest act License prior to disturbance.</p>		<p>and some change is allowed for biodiversity processes, due to development, in ESA1 and ESA2 areas. The fact that the development is situated within an ESA can therefore not be seen as a fatal flaw.</p> <p>The area considered as a no go area was determined as such due to the occurrence of <i>Aloe dichotoma</i> in this area. This area cannot be developed. All locations where this species was recorded is given in Error! Reference source not found. of the Ecological Report (refer to Appendix D of the EIAR). All individuals of this species were recorded outside of the footprint of the CSP facility and can therefore be avoided, and not affected by the development.</p> <p>12) The specialist Ecological Impact Assessment Report was corrected to include the NCNCA under applicable legislation (refer to Section 2.3 of the Ecology Report contained in Appendix xD)</p> <p>13) <i>Schotia afra</i> var. <i>angustifolia</i> does occur in the region but inhabits riverbanks of which none occur in the study area.</p> <p>14) Comment noted.</p>

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ISSUES RAISED BY LANDOWNERS			
8.	Agreement regarding the maintenance of the fences between Abengoa's property and my farm needs to be reached. I currently have a lot of jackals entering my farm from their property. This is a concern to me as I am losing income since the jackals are killing my sheep.	Fanie van der Heever Adjacent Landowner	The gentlemen's agreement of dual ownership on border fences shall be maintained which implies that 50% of maintenance costs shall be carried by the developer.
9.	We have experienced problems regarding the storm water runoff from Abengoa's site onto the Paulputs gravel road. The road is not useable as the storm water runoff floods the road. The new project must ensure that the storm water management system is correctly engineered.	Scuit-Klip 1/92 Meeting: 26-05-2016	The reported problem has received the needed attention since the problem was observed and Abengoa's engineers are working on probable mitigation measures to address this accordingly. The EMPr includes a requirement that appropriate stormwater management measures are implemented to address such issues.
10.	I have no issues with the development expect for dust issues.	Willem Burger Adjacent Landowner Farm Paardeneiland RE/90 Meeting: 26-05-2016	The EMPr includes a requirement for the implementation of appropriate dust suppression measures during construction and operation of the facility.
WATER RESOURCES & WATER USE LICENSE APPLICATION PROCESS			
11.	Are there any drainage lines on the site?	Ms C Schwartz & Mr M Cebekhulu Orange Proto CMA Department of Water & Sanitation	According to the aquatic specialist, drainage lines are present on site. It must be noted that these systems were highly fragmented by the roads and farming practices in the past while the adjacent projects have now disrupted any flows within these systems. The significance of this impact at the time of assessing the adjacent projects was low, due to the impacts

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		Meeting: 27-05-2016	and high degree of fragmentation coupled to the general lack of any important / visible aquatic habitat.
12.	How much water is required to be abstracted from the Orange River?		Approximately 300 000 cubic meters of water will be required annually during the operation phase.
13.	How much water is required to be abstracted from the Gariiep (Orange) River?		
14.	How far is the development from the Gariiep (Orange) River?		The development is between 20 – 25km from the Orange River.
15.	How long is the proposed pipeline?		The pipeline will be approximately 35km in length. The exact length will be known once the designs are finalised.
16.	How will sewage be dealt with during the construction and operation phases of the project?		<p>Portable chemical toilets will be used during the construction phase. A service provider will be appointed to supply and service the portable chemical toilets.</p> <p>A water treatment plant will be installed on the site for the operation phase. The waste water will be reused and recycled as far as possible. Water that cannot be reused will be discharged into the onsite evaporation ponds.</p>
17.	What studies are being undertaken in the EIA? Have these been undertaken as yet.		<p>The following studies have been undertaken as part of the EIA process:</p> <ul style="list-style-type: none"> • Soils and Agricultural Potential Impact Assessment • Avifauna Impact Assessment • Visual Impact Assessment • Social Impact Assessment • Ecological Impact Assessment • Water Resources Assessment • Heritage Impact Assessment <p>The studies were undertaken in April 2016. The draft EIA Report was made available for a 30-day review period from</p>

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			4 May 2016 – 3 June 2016. The review period ends on 3 June 2016.
18.	Who is undertaking the Water Resource Assessment? The National Water Resource Planning directorate should be consulted during the water use license application process to determine how much water can be abstracted from the reserve.		Brain Colloty from Scherman Colloty and Associates is undertaking the Water Resource Assessment. The relevant stakeholders will be consulted as part of the water use licensing process.
19.	What is the quaternary catchment number?		The site is located in sub-quaternary catchment 3349.
20.	Will water be stored on site?		Water will be stored on site in a water reservoir or storage tank. The capacity of the reservoir or storage tank will be confirmed once the designs have been finalized.
21.	Does the Municipality have capacity to accommodate solid waste?		The Municipality will need to confirm that capacity is available. If there is insufficient capacity, then waste will be disposed of at other waste disposal sites in the region.
22.	Does the 300 000 cubic meters include the water volumes required for dust suppression measures that will be implemented during construction?		The required water volumes do not include the water volumes required for dust suppression measures during the construction phase. The appointed contractor will be required to provide the applicant with the amount of water required. We acknowledge that water volumes are a concern and waterless dust suppression techniques are therefore being investigated.
23.	Where will water for the project be sourced? Has a water use license application been undertaken?	Peter Cloete District Ecologist Northern Cape Department of Environment and Nature Conservation Teleconference: 09-06-2016	Water is proposed to be abstracted from the Gariep (Orange) River. The water use license application process will be undertaken once the project receives preferred bidder status from the Department of Energy. The applicant has requested a non-binding letter from the Department of Water and Sanitation in the interim.

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IMPACTS TO AVIFAUNA			
24.	<p>Thank you for the opportunity to comment on the above report. BirdLife South Africa supports the responsible development of renewable energy. However, birds may be injured or killed at Concentrated Solar Power (CSP) facilities if they collide with the reflective surfaces (e.g. heliostats), or with associated infrastructure (e.g. powerlines and fences). CSP tower technology presents an additional risk to birds – they may be burned if they fly through the area of concentrated solar flux. CSP facilities may also impact on birds indirectly by destroying or degrading large areas of habitat and displacing sensitive species.</p> <p>i. If solar energy is to be developed without having marked negative impacts on birds, rigorous impact assessment of proposed CSP facilities is critical. We are therefore pleased to note that an avifaunal specialist was appointed to undertake an avifaunal impact assessment. However, only two site visits were conducted (one in the wet season and one in the dry season), as opposed to the four or more site visits BirdLife South Africa recommends for developments of this nature and scale (as per draft Guidelines included with our comments on the scoping report dated 3 December 2015). Provided they are well-timed, two site visits may be adequate to obtain a representative sample of the diversity of species likely be affected by the facility, however, they may not be adequate to record finer details such as patterns of movement, important habitats, breeding areas, rare species etc. This information could be central to properly assess and mitigate impacts. Given the</p>	<p>Samantha Ralston Birds and Renewable Energy Manager and Simon Gear Programme Manager: Policy and Advocacy</p> <p>BirdLife South Africa</p> <p>Letter: 27-05-2016</p>	<p>i. The avifaunal assessment undertaken by Adrian Hudson was peer reviewed by Rob Simmons for comment on the monitoring undertaken for the project. Please see attached Appendix Q. Rob Simmons upon review of the report states that two visits timed for August-November and March/April, as undertaken by the specialist, will record <u>resident</u> and <u>nomadic</u> birds present and breeding respectively and that summer and winter visit (as advised by the DEA) would miss both peaks and cannot be supported.</p> <p>ii. On inspection of the “<i>Guidelines to minimise the impact of solar facilities and infrastructure on avifauna</i>” references the following can be noted that, of the 86 references in the BLSA Guidelines of November 2016:</p> <ul style="list-style-type: none"> • 33 References are avifauna and windfarm studies (conclusions drawn from windfarm studies and applied to solar facilities is erroneous as the infrastructure and mechanism associated with each are vastly incongruent) ; • 27 references are related to avifauna census and other methodologies and not studies specific to avifauna and solar (or even renewable energy) studies; • 10 references are solar related, but not avifauna related; • 4 references are not based on peer reviewed articles (although one, Walston <i>et al</i>, will be published in July 2016. It must also be noted that according to Walston <i>et al</i>. the injuries and fatalities are considerably lower than most

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	<p>proximity to an Important Bird and Biodiversity Area we suggest that a rigorous assessment would be prudent. The avifaunal specialist report does not clarify if the “wet season” site visit was indeed well-timed and coincided with the expected increase in species diversity, abundance and activity associated with the wet season.</p> <p>ii. Despite the literature review including “Guidelines to minimise impact of solar facilities and infrastructure on avifauna”, little further mention is made of these guidelines in the avifaunal specialist study. Key references included in the draft Guidelines, and included our comments on the draft Scoping Report, are absent from the avifaunal study and literature review. Most notably we refer to Walston et al. 2015 and the recently published peer reviewed paper arising from this report². While the McCrary (1986) study is a useful resource, it is out-dated. Shawn Smallwood’s testimony details the shortcomings of the their approach to estimating fatality rates at Solar One. To summarise, the approach did not adequately account for searcher efficiency and scavenger removal. In his report, Mr Hudson suggests the information on which our comments were based was from “colloquial articles”. We disagree and suggest that the lengthy reference list included in our draft Guidelines would be a good departure point for a more detailed and up-to-date literature review.</p> <p>iii. A further shortcoming of the avifaunal impact assessment is that the Red Data Book statuses</p>		<p>colloquial articles and BLSA predictions, as stated in the June BLSA newsletter. In fact it works out to a mean of approximately 110 birds per facility per annum);</p> <ul style="list-style-type: none"> • 9 references deal with avifauna and collisions with power lines; • Thus leaving only 3 references that are actually avifauna – solar related. One of these articles was McCrary et al. as used in the report I compiled, one was PV related and one was BLSAs previous guidelines for solar written by Smit in 2012, thus effectively only one peer reviewed literature source on the impact of solar facilities on birds was utilised. <p>iii. Corrections have been made to the Avifaunal Report in response to comments received from BirdLife regarding the conservation status of avifauna in the study area.</p> <p>iv. Editorial errors in the avifauna report have been corrected.</p> <p>v. Corrected in the report, but although the Maccoa Ducks have been occupying the pond at Kaxu for more than a year now, not a single fatality has been recorded. This will however form part of the monitoring plan.</p> <p>vi. The absence of the birds from the area was based on:</p> <ul style="list-style-type: none"> • The fact that they are absent from the area; and

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	<p>provided in the main text are out-of date. For example, the report suggests that Secretarybird is Near Threatened, but it is now listed as Vulnerable both globally and regionally. The Red Data Book statuses appear to be correctly reflected in Appendix A. This inconsistency should be corrected in the report.</p> <p>iv. Although it does not affect the substance of the assessment, there are also a number of editorial errors in the avifaunal assessment and draft EIA report that should be corrected. For example, the page header of the avifaunal impact assessment incorrectly refers to the report as a Scoping Report. Similarly, the page header from page xxvi onwards of the Executive Summary of the EIR refers to a Scoping Report, and page xv suggests the deadline for comment is in 2015. We hope that similar oversights have not crept in to more material aspects of the impact assessment.</p> <p>v. One major oversight in the avifaunal assessment is that the potential for the evaporation ponds, on site and at the adjacent CSP facilities, to attract birds and increase the risk of collisions and solar flux injuries, has not been adequately considered. Although relatively new, the ponds at Kaxu are already attracting species such as Maccao Duck (Near Threatened and listed under the Convention of Migratory Species). As they mature, the evaporation ponds are likely to attract more birds. The risks associated with this should be carefully assessed and</p>		<ul style="list-style-type: none"> • The fact that the vegetation communities within the study area are very different than that of the majority of the IBA. <p>It is quite true that these species may have been displaced through construction, but it is also likely that they may remain displaced due to continued activity or it may be likely that they did not occur there to begin with. We all know that lion and rhino occurred in this area, we cannot assume their presence because they have been recorded in this area previously. In addition (according to the Southern African Bird Atlas):</p> <ul style="list-style-type: none"> • Secretary bird has never been recorded in the QDS in which the study area occurs. • Sclaters Lark has never been recorded in the QDS in which the study area occurs. • Ludwigs Bustard has never been recorded in the QDS in which the study area occurs. • Lanner Falcon has never been recorded in the QDS in which the study area occurs • Kori Bustard has never been recorded in the QDS in which the study area occurs • Martial Eagle has never been recorded in the QDS in which the study area occurs <p>vii. Cumulative impacts were not assessed based on the impacts of the CSP tower facility alone but on the impacts that are common to CSP tower facilities and all other solar power facilities in the area (CSP trough and PV facilities included). By definition cumulative impacts are impacts that are common to various developments in an area.</p>

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	<p>mitigated. For example, we recommend that they should be located well away from the heliostat field.</p> <p>vi. We are somewhat comforted by the fact that few Red Data Book species and few Important Bird and Biodiversity Area trigger species have been recorded on site, despite the proximity to an Important Bird and Biodiversity Area. However, we do not share the specialist's confidence that species such as Secretarybird, Kori Bustard, Ludwig's Bustard and Sclater's Lark are entirely absent from the area. Larks are locally nomadic, and bustards and Secretary birds move regionally. Some birds may also have been temporarily displaced by construction activities associated with Kaxu and Xina. We also do not support the specialist's confidence in his significance ratings - there are many sources of uncertainty, including with regards to the species present on site, their use of the area, the potential for birds to be attracted to the facility, and how to quantify the risk of collisions and solar flux injures. The limitations of the assessment should be acknowledged.</p> <p>vii. We also question the approach to assessing cumulative impacts and suggest that the potential cumulative risks and benefits of developing a cluster of solar energy developments should be more rigorously assessed. This should not be limited to the impacts of CSP tower projects, but should extend to all energy-related infrastructure proposed and developed in the area. We suggest that consideration be given to the likely and known impacts, monitoring</p>		<p>The avifaunal specialist is not appointed to monitor impacts at Xina and Kaxu, but is appointed to monitor impacts at Khi Solar One near Upington.</p> <p>As mentioned in the Avifaunal report, monitoring is recommended and would be included in the EMPr for the project. The Avifaunal specialist has suggested and had an extensive and very robust monitoring programme approved for Khi Solar One and will be publishing the findings in peer reviewed journals.</p>

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	<p>requirements, and the likely effectiveness of mitigation plans at the adjacent facilities. We are surprised that the avifaunal specialist is unable (or unwilling) to comment on these, as we understand that he has been appointed to monitor the impacts of Xina and Kaxu on birds. We suggest that, should the application be approved despite the shortcomings of the assessment, efforts to monitor and mitigate impacts should be coordinated between the projects. We also urge that the impacts are monitored in accordance with the methods outlined in our draft Best Practice Guidelines and that the results of this work be shared with BirdLife South Africa. We further request that these results be published in a peer review journal, so that we can better understand and mitigate impacts of CSP in the future to ensure that impacts on birds and other biodiversity are minimised.</p>		
ROADS CONSTRUCTION AND REALIGNMENT			
25.	<p>Will any new roads need to be constructed as part of the Paulputs CSP project?</p>	<p>Peter Cloete District Ecologist</p> <p>Northern Cape Department of Environment and Nature Conservation</p> <p>Teleconference: 09-06-2016</p>	<p>A new access road is proposed to be constructed off the R357 (Onseepkans Rd). It should be noted that the existing road MN73 will need to be realigned to accommodate the heliostat field and tower of the CSP facility. A separate Basic Assessment process will be undertaken for the realignment of the MN73 road.</p>
GENERAL			
26.	<p>The no-go areas are not included in the sensitivity map of the ecological report.</p>	<p>Peter Cloete District Ecologist</p>	<p>Based on the sensitivity factors such as conservation importance, ecological integrity and probability of</p>

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		Northern Cape Department of Environment and Nature Conservation Teleconference: 09-06-2016	occurrence of species of conservation importance a sensitivity map of the area was compiled and is given in Error! Reference source not found. of the Ecology report. The area considered as a no go area was determined as such due to the occurrence of <i>Aloe dichotoma</i> in this area. There is currently a moratorium on the removal of this species from the wild and thus this area cannot be developed. This area, and the Aloe dichotoma species occurring in the area, does not fall within the footprint area and will therefore not be affected by the development in any way
27.	Are dust suppression techniques considered within the EIA Report?		The management of dust is considered in the Environmental Management Programme which is included as Appendix K of the EIA Report.
28.	Will the water pipeline require a separate EIA?		The water pipeline is being assessed under the EIA process for the Paulputs CSP facility.
29.	Have comments been submitted by Department of Agriculture, Forestry and Fisheries (DAFF): Forestry Management? Were any concerns regarding protected tree species raised?		Comments were submitted by DAFF with respect to protected tree species. No protected tree species were identified on the site.
30.	Please inform me of any site visits with the National DEA.		Site visits are usually arranged once the final EIA Report is submitted. Mr Cloete will be notified of any site visits requested by National DEA.

COMMENTS RECEIVED: SCOPING PHASE

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I&AP REGISTRATIONS AND PUBLIC PARTICIPATION PROCESS			
1.	Your company is currently conducting an Environmental Impact Assessment for the proposed Paulputs 200MW CSP project in the Northern Cape. Please forward me the BID for this application and register me as an Interested & Affected party?	Melanie Miles Content Researcher Leads 2 Business Email: 16-09-2015	Ms Mile's was registered as an Interested and Affected Party (I&AP) on the register of I&APs for the project.
2.	This communicate serve as a formal registration on your above mentioned project database. Reason being: As the current CLO of AEPC in the existing project, I'm constantly in contact with stakeholders. And always be in a spot of border concerning questions related to this and future projects. I personally believe it could be advantageous for all involved if and when I know more of the processes and prospects in and around the area. Take into account that I fully understand the confidentiality concerning certain processes, but still think that I can do with more generic info from your site if and when available.	Charles Gregory March Community Liaison Officer Abengoa Abeinsa XiNa Solar One & Khi Solar One Email: 17-09-2015	Mr March was registered as an I&AP on the projects database.
3.	When will public participation meetings take place?	Peter Cloete Research and Developments and Conrad Geldenhuys Research and Developments Northern Cape Department of Environment and Nature Conservation	Focus group meetings with the landowners located adjacent to the proposed site and pipeline route were convened on 18 November 2015. Meetings convened with key organs of state departments as follow: DWS: 17 November 2015, DENC, today 19 November a meeting with Department of Roads and Public Works has been arranged. 1. A public meeting and follow-up focus group meetings will be convened in the EIA phase of the process.

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		Meeting: 19-11-2015	
ACKNOWLEDGMENTS RECEIVED FROM ORGANS OF STATE AND PARASTATALS			
4.	We hereby acknowledge your proposed project. For future reference, please quote CPDR0647-15.	Chris Schutte Mvelaphande Trading (on behalf of Telkom) Email: 9-10-2015	Acknowledgment noted, no response required.
5.	Please find attached requirements for works at or near Eskom infrastructure.	John Geeringh Senior Environmental Advisor GC Land Development Eskom Email: 16-11-2015	Eskom's requirements for works at or near Eskom infrastructure is noted. The information received from Eskom has been provided to the project developer for consideration during the design phase of the proposed project
6.	The Department confirms having received the Scoping Report for environmental authorisation of the above-mentioned project on the 18 th November 2015. As required in terms of the Environmental Impact Assessment Regulation, 2014. The application has been assigned the reference number NC/NAT/NAM/KHA/POF1/2015. Kindly quote this reference number in any future correspondence in respect of the application. Please note the responsible officer is going to be Ms. Onwabile Ndzumo.	Ms. L. Tools-Bernado EIA Administration Department of Environment & Nature Conservation (DENC) Letter: 01-12-2015	Acknowledgment noted. Ms Onwabile Ndzumo's details have been included on the database of I&APs. A meeting was held with Peter Cloete and Conrad Geldenhuys from the Research and Developments Department of the Northern Cape Department of Environment and Nature Conservation on 19 November 2015. The minutes have been included here.
7.	The Department of Rural Development and Land Reform (DRDLR) would like to convey its gratitude for being notified about the availability of the basic scoping report for	Khathu Muruba Professional Town and Regional Planner	Acknowledgment noted, no response required.

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	<p>the project. The Department has perused the documentation(s) sent. Based on the above, the Department does not have any objections to the Paulputs CSP Project (200MW concentrated solar power project). However, the Department would like to be notified of anything related to the project in future.</p>	<p>Spatial Planning & Land Use Management Branch National Department Of Rural Development & Land Reform Email: 9-12-2015</p>	
COMMENTS RECEIVED FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
<p>8.</p>	<p>The draft Scoping Report (SR) dated November 2015 and received by this Department on 18 November 2015, and the acknowledgement letter of the SR issued by this Department on 23 November 2015 refer.</p> <p><u>This Department has the following comments on the abovementioned application:</u></p> <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 amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms 	<p>Mr Sabelo Malaza Chief Director: Integrated Environmental Authorisations Signed by Coenrad Agenbach Deputy Director: Strategic Infrastructure Developments Department of Environmental Affairs (DEA) Letter: 08-12-2015</p>	<p>The Departments comments on the Paulputs CSP Project are noted.</p>

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	<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.</p> <p>iv. 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>v. Scoping specialist studies, if applicable, must be submitted to the Department with the final SR.</p>		
	<p>vi. This Department requires a cumulative impact assessment to be undertaken in the final SR to determine potential fatal flaws.</p>		<p>Potential cumulative impacts are evaluated in the Scoping Report. Refer to section 6.6 of the Scoping Report. The Scoping Study found no fatal flaws.</p>
	<p>vii. The Department requests the EAP to include the specialist consultants who will conduct the specialist assessments.</p>		<p>The specialist consultants who will conduct the specialist assessments are listed in the Scoping Report in Table 8.1 of Chapter 8.</p>
	<p>viii. This Department requires an avifaunal assessment study to be included as part of the PoSEIA. This must be a separate study and not form part of the ecological impact assessment.</p>		<p>The requirement for a separate avifauna impact assessment study has been included as part of the PoSEIA. Refer to Table 8.1 in Chapter 8 of the Scoping Report.</p>
	<p>ix. 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</p>		<p>Chapter 6 of the Scoping Report identifies and assesses impacts. Chapter 6 provides for mitigation measures to the impacts during the EIA phase</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	measures of the impacts on the alternative and preferred sites.		
	x. 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 1 (2) (e) and 3 (1) (h) (i) 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 1.		A description of identified alternatives that are feasible and reasonable is provided in Section 2.4 of the Scoping Report. Advantages and disadvantages to the environment as well as to the community can only be provided following site investigations which are scheduled to be undertaken during the EIA phase
	xi. In accordance with Appendix 1 (3) (1) (a) of the EIA Regulations 2014, the details of – (i) The EAP who prepared the report; and (ii) The expertise of the EAP to carry out Scoping and Environmental Impact assessment procedures; must be submitted.		The details are provided in Section 1.4 of Chapter 1 and Appendix A of the Scoping Report
	xii. 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.		It is noted that the final SR to be submitted to the 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. A checklist with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 has been included in the Scoping Report. Refer to Table 1 of the Scoping Report.
	xiii. 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).		It is noted that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

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	<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		
IMPACTS ON THE SKA: SOUTH AFRICA			
9.	<p>This letter is in response to your email request, to provide an assessment on the potential development of concentrated solar power electricity generation facilities in the Northern Cape Province and the risk they may pose on the Square Kilometre Array Project.</p> <p>A high level risk assessment has been conducted at the South African SKA Project Office to determine the potential impact of such facilities on the Square Kilometre Array. This letter serves to confirm the outcomes of the risk assessment, and proposals for any future investigations associated with this facility.</p> <ol style="list-style-type: none"> i. The location of the proposed facility has been provided background information document compiled by Savannah Environmental (Pty) Ltd; ii. The nearest SKA station has been identified as SKA ID 1896, at approximately 107 km from the proposed installation; iii. Based on distance to the nearest SKA station, and the information currently available on the detailed design of the CSP installation, this facility poses a very low risk of detrimental impact on the SKA; iv. Any transmitters that are to be established, or have been established, at the site for the purposes of voice and data communication will be required to comply with the relevant AGA regulations 	<p>Adrian Tiplady Head of Strategy SKA South Africa</p> <p>Letter: 30-09-2015</p>	<p>It is noted that the proposed Paulputs CSP project will pose a very low risk of detrimental impact on the SKA and that no mitigation measures would be required at this stage. The South African SKA Project Office will be kept informed of progress with this project, and it is acknowledged that the Office reserves the right to further risk assessments at a later stage.</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	<p>concerning the restriction of use of the radio frequency spectrum that applies in the area concerned;</p> <p>v. As a result of the very low risk associated with the CSP facility, no mitigation measures would be required at this stage. However, the South African SKA Project Office would like to be kept informed of progress with this project, and reserves the right to further risk assessments at a later stage.</p> <p>This technical advice is provided by the South African SKA Project Office on the basis of the protection requirements of the SKA in South Africa, and does not constitute legal approval of the renewable energy project in terms of the Astronomy Geographic Advantage Act, the Management Authority, and its regulations or declarations.</p>		
IMPACTS ON INFORMATION COMMUNICATION TECHNOLOGY			
10.	<p>We want to plot the site of the solar collector to check our surrounding radio network. I cannot find the Paulputs project on your site for more information. Do you have the coordinates of the tower, width and height?</p>	<p>Leonard Shaw Specialist Network Architecture and Planning</p> <p>Telkom</p> <p>Email: 02-10-2015</p>	<p>The height of the tower will be up to 300m. The width will be approximately 40 m in diameter at the base and 30 m in diameter at the top. The exact position of the tower will be finalised during the EIA phase pending the findings and conclusions of the EIA report. Coordinates will be provided during the EIA Phase.</p> <p>Approximate coordinates for tower is as follows: 28°51'41.18"S 19°34'37.74"E</p>
11.	<p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Telkom SA SOC Ltd) in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p>	<p>Chris Schutte Mvelaphande Trading (on behalf of Telkom)</p> <p>Email: 30-11-2015</p>	<p>The position of existing Telkom infrastructure is noted, however it is unlikely that the project developer's contractors will damage Telkom's lines. The project developer do not foresee the need to relocate any structures at this point in time.</p>

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	<p>Our Client (Telkom SA COC Ltd)'s infrastructure is affected by this proposal and the route is marked in Orang on attached sketch as accurately as possible. Therefore any damages occurred during construction of work will be repaired as the customer's account.</p> <p>On completion of this project, please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (Telkom SA SOC Ltd) infrastructure has to be relocated or altered as a result of your activities the cost of such alterations or relocation will be for your account in terms of section 25 of the Electronic Communication Act.</p> <p>Mr Vivian Groenewald must be contacted at telephone number 081-362-6738, 2 (Two) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>Please notify this office and forward an as built plan, within 30 days of completion of construction.</p> <p>Mr Vivian Groenewald must be contacted from our Client (Telkom SA SOC Ltd) Network Fields Services before commencement of any work.</p>		<p>The need for notification prior to construction and as built plans is also acknowledged by the project developer.</p>

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LANDOWNER CONCERNS			
12.	We received a letter yesterday (21 October 2015) about the environmental study on the matter mentioned above. As the owner of the neighbouring farm Konkoonsies I would like to be in on the discussion around some previous problems around the severe dust pollution on my land, during preparing and removal of the dusty topsoil. Due to the late receipt of your letter through the post I hope I am not too late to discuss this serious matter. In the future kindly use this email address for any further correspondence.	Francois van den Heever Adjacent Landowner Konkoonsies Trust Email: 22-10-2015	Mr Van den Heever's email was acknowledged. It was noted that the public participation process for the project was still underway and that I&APs would still be provided with opportunities to raise their concerns or issues within the EIA process. Landowner meetings were convened during the 30-day review period of the Scoping Report in November 2015. A meeting was held with Mr Van der Heerver on 18 November 2015. The issues raised have been minuted, included in the Comments and Responses Report and brought to the attention of the project developer. Mitigation measures to suppress dust emissions as a result of the proposed project will be investigated during the EIA Phase and mitigation measures to suppress dust emissions will be included as part of the EMPr.
13.	How far will the facility be from the existing road gravel road (MR73)?	Willem Burger Adjacent Landowner (Project Site & Pipeline) Farm Paardeneiland RE/90	The gravel road (MR73) currently bisects the site. The road will need to be realigned so that it does not traverse through the facility. A meeting was held with the road owner on 17 December 2015 (refer to Comment no. 60.) More information will be made available during the EIA Phase.
14.	Where will the pipeline be routed?	Meeting: 18-11-2015	The pipeline will run parallel to the existing KaXu Solar One pipeline within the servitude of the existing R357 Onseepkans road until it reaches the farm Vrugbaar. The abstraction point on the Orange River will be located on the remaining extent of the farm Vrugbaar 422.
15.	Dust will be an issue during the construction of the pipeline as it settles on the grass. Grazing camps located closest to the facility will be affected as sheep will not eat dust covered grass.		Mitigation measures to suppress dust emissions as a result of the proposed project will be investigated during the EIA Phase and mitigation measures to suppress dust emissions will be included as part of the EMPr.

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
16.	Please ensure that the contractors do not damage to the boundary fences along the pipeline route.		Contractors will be required to replace the fences if they are damaged as a result of construction activities.
17.	The possibility of stock theft will increase.		Construction workers are supervised. Incidences of stock theft should be reported to the construction team.
18.	I have three camps that are located next to the proposed water pipeline. These camps do not have any water sources. Would it be possible to tap into the pipeline to get water for the three camps? I would require at least a 1000l/day.		The proposed project is not intended to provide a water supply service. The feasibility of the request will need to be explored with the Department of Water and Sanitation.
19.	Dust caused by construction activities and an increase in traffic and abnormal loads is a serious concern. The surrounding land is used for grazing purposes and my livestock do not eat grass covered in dust.	Fanie van der Heever Adjacent Landowner (Project Site)	Mitigation measures to suppress dust emissions as a result of the proposed project will be investigated during the EIA Phase and mitigation measures to suppress dust emissions will be included as part of the EMPr.
20.	Tremors caused by blasting that took place for the previous project have resulted in cracks occurring in the walls of infrastructure on my farm. Will blasting take place for the CSP project?	Konkoonsies Trust Meeting: 18-11-2015	The need for blasting during construction is not confirmed. This would be confirmed through the findings of the geotechnical assessment.
21.	Who will be responsible for the upkeep and maintenance of perimeter fencing?		The landowner will be responsible for upkeep and maintenance of his perimeter fence. The contractor will be responsible for repairs to the boundary fence if the fences are damaged as a result of construction activities.
22.	We do not have any concerns regarding the project or the construction of the proposed pipeline.	Willem Jannetjys & Elmien Jannetjys Landowners (Pipeline)	It is noted that Mr and Mrs Jannetjys do not have any concerns regarding the project or construction of the pipeline at this time.
23.	Would it be possible for the surrounding farmers to tap into the water pipeline? We applied for a water use license with the Department of Water and Sanitation for 4000l/day and we are waiting for a response.	Farm Astof 2/421 Meeting: 18-11-2015	The proposed project is not intended to provide a water supply service. Feasibility of the request will need to be explored with the Department of Water and Sanitation.
24.	There are geotechnical issues within the area. Hard rock (klipbanke) as large as 50m x 100m occurs within the vicinity. It will be very costly to lay the pipeline as a lot of blasting will have to be undertaken.	Niel van Rensburg Adjacent Landowner (Pipeline)	It is noted that there may be geotechnical issues which would need to be considered within the EIA. However it must be reiterated that the pipeline will run parallel to the existing KaXu Solar One pipeline within the servitude of

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		Astof RE/421 Meeting: 18-11-2015	the existing R357 Onseepkans road therefore due to previous geotechnical investigations undertaken for the KaXu Solar One pipeline, the underlying geology is already known. This information has been forwarded to the project developer.
25.	How many pumps will be used to extract water from the river and what is the elevation difference between the river and the proposed site?		X2 abstraction pumps, x2 booster pumps, Elevation difference = 394m
26.	It is preferred that the pipeline traverse as close as possible to the property edge to keep the current land use vacant for future farming purposes.	Lukas van Zyl Impacted Landowner (Pipeline) Vrugbaar Boerdery	The pipeline will run parallel to the existing KaXu Solar One pipeline within the servitude of the existing R357 Onseepkans road until it reaches the farm Vrugbaar. The abstraction point on the Orange River will be located on the remaining extent of the farm Vrugbaar 422.
27.	I am concerned that my existing pipeline will be at risk during blasting which will be undertaken for the construction of the new pipeline.	Farm Vrugbaar RE/422 Meeting: 18-11-2015	It is noted that the landowner is concerned that blasting activities may put his existing pipeline at risk. The need for blasting during construction is not confirmed. This would be confirmed through the findings of the geotechnical assessment. This issue has been brought to the attention of the project developer.
28.	I am concerned about the impact that the potential increase in dust would have on the vineyards during the construction of the pipeline.		Mitigation measures to suppress dust emissions as a result of the proposed project will be investigated during the EIA Phase and mitigation measures to suppress dust emissions will be included as part of the EMPr.
ECOLOGICAL IMPACTS			
29.	DEPARTMENTAL MANDATE The Branch: Forestry and Natural Resource Management in the 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.	Jacoline Mans Chief Forester: NFA Regulation Department of Agriculture, Forestry and Fisheries	The proposed project will comply with the relevant sections on the NFA as required. DAFFs requirements in response to the Background Information Document have been included in the Plan of Study for the EIA (Chapter 8 of the EIA Report) and will therefore be part of the EIA Phase of the project.

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	<p>The proposed development must comply with the following sections of the NFA:</p> <p>Section 15(1): "No person may-</p> <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>Section 62(2)(c): "Any person who contravened 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>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>Letter: 30-10-2015</p>	<p>The specialist Ecologist responded to DAFFs comments on the Background Information Document in the Ecology Report (refer to page 30 of Appendix E of the Scoping Report).</p> <p>The land has been rezoned as Special Solar by the landowner who is the same entity as the applicant.</p> <p>The Forestry Office in Upington has been registered as a commenting authority.</p>

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	<p>COMMENTS ON BACKGROUND INFORMATION DOCUMENT</p> <p>Kindly ensure that you assess the potential impact on slow growing protected trees (if any) and where possible avoid such trees. The assessment should include the impact on riparian vegetation at the water abstraction point at the Gariiep (locally known as the Orange) River. The riparian Lower Gariiep Alluvial Vegetation type is classified as 'endangered' and the NFA listed protected and rare Ebony tree (<i>Euclea pseudebenus</i>) species is associated with this vegetation type in the vicinity of Onseepkans.</p> <p>The proposed development, with a footprint of 900 ha, is located adjacent to the existing Xina CSP and KaXu CSP. It is important to note that this Department will assess cumulative impacts on NFA listed protected tree species.</p> <p>The indigenous and endemic <i>Schotia brachypetala</i> var. should also be avoided as far as possible and if impacts cannot be avoided, rehabilitation with the same species should be included as mitigation in the EMP.</p> <p>For land zoned for agriculture, the Sub-division of Agricultural Land Act 70 of 1970 may also be applicable, requiring inputs from the DAFF. Any land demarcated under the Act, thus agricultural land, cannot be changed to another land use without the supported recommendation under Act 70 of 1970. A local authority cannot change the zoning of demarcated agricultural land to any other zoning without a letter from the Registrar of this Act. The contact persons are: Ms Mashudu Marubini (Delegate of the Minister for Act 70 of 1970, MashuduMA@daff.gov.za, tel (012) 319 7619); Ms Thoko Buthelezi (AgriLand Liaison</p>		<p>The EMP has been edited accordingly to include this mitigation measure</p> <p>Comment noted, The application for the rezoning from Agricultural land use to a Special land use shall be pursued once the EIA phase is completed. A valid EA is required as part of the rezoning application.</p>

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	<p>office, ThokoB@daff.gov.za, tel (012) 319 7634) or Ms. Hettie Buys Act 70/70 Registry (HettieB@daff.gov.za).</p> <p>Kindly ensure that you register the Forestry Office in Upington as a commenting authority and supply copies (hardcopies or electronic) of the ecological impact assessment specialist report, as well as other relevant documentation, for commenting purposes.</p>		
30.	<p>With reference to the sensitivity map, what criteria were used to identify the sensitive areas on the site?</p>	<p>Peter Cloete Research and Developments and Conrad Geldenhuys Research and Developments Northern Cape Department of Environment and Nature Conservation Meeting: 19-11-2015</p>	<p>The criteria used by the ecologist, Adrian Hudson of Hudson Ecology, to identify sensitive ecological areas included a literature review, review of previous work conducted for the property and a site investigation which was conducted from 4 August 2015 – 14 August 2015. Twelve study sites within the study area were randomly selected to describe the character of the environment as well as flora and fauna species that may be impacted by the proposed activities. The ecologist based his assessment on the Precautionary Principle (COMEST 2005) which assumes a higher conservation importance. The methodology and criteria used to identify areas of sensitivity are described in the Ecological Scoping Study. Please refer to Appendix E of the Scoping Report, Section 8, specifically Section 8.5 which as used to develop the sensitivity map.</p> <p>During the EIA Phase, based on the sensitivity factors such as conservation importance, ecological integrity and probability of occurrence of species of conservation importance a sensitivity map of the area was compiled and is given in Error! Reference source not found. of the Ecology Report.</p>
31.	<p>The term "Natural Areas" on the sensitivity map needs to be clarified. How do the natural areas identified differ from</p>		<p>The Ecological Scoping Study provides a description of these terms and is included as Appendix E of the Scoping</p>

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	<p>the areas identified as "moderate ecological function" shown in pink? Does it imply that the pink areas are not natural areas? There needs to be a better description of "natural areas" and areas of "moderate ecological sensitivity".</p>		<p>Report. In terms of Section 8.5 of the Ecological Scoping Study (Appendix E): Natural area: The natural areas are considered of very high conservation importance due to the presence of Red Data species in these areas and the intrinsic importance of these areas. Moderate ecological function area: Areas that have been disturbed by farming are considered of moderate conservation importance due to the fact that rehabilitation of these areas is possible.</p> <p>The pink areas are not natural areas in terms of the Ecological Scoping Study. The pink area is showing an area that has been disturbed by farming and is considered of moderate conservation importance due to the fact that rehabilitation of this area is possible (in the long term).</p> <p>During the EIA Phase, based on the sensitivity factors such as conservation importance, ecological integrity and probability of occurrence of species of conservation importance a sensitivity map of the area was compiled and is given in Error! Reference source not found. of the Ecology Report.</p>
32.	<p>In what season is the ecological specialist study scheduled to take place?</p>		<p>The ecological study will take place in the wet season. The specialist plans to conduct the assessment after January 2016.</p>
33.	<p>The Northern Cape is currently experiencing drought conditions. It is advised that the specialist notes that drought conditions in their reporting.</p>		<p>It is noted that the specialist should note the drought conditions on site. This has been communicated to the specialist. Due to staff being located on the project site, it is definitely possible for the ecologist to be alerted to rainfall events and co-ordinate field work accordingly.</p>
34.	<p>It is recommended that bat populations will have to be investigated and assessed, especially in the mountainous</p>		<p>A bat study has been undertaken. Please refer to Appendix X of the EIAR.</p>

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	<p>areas. It is understood that insects are attracted to the residual glow from the tower in the evening which may attract bats. The impact of this would need to be understood. Marnus Smit, a previous employee of the DENC, may have existing data on bat populations in the area which the specialist could use.</p>		
POTENTIAL IMPACTS ON AVIFAUNA			
	<p>Thank you for the opportunity to comment on the above report. BirdLife South Africa supports the responsible development of renewable energy in South Africa and we recognise the potential benefits of Concentrated Solar Power (CSP). Our goal is to ensure that the impacts on birds are properly understood and minimised, so that the renewable energy is developed in an environmentally sustainable manner. Key to this is developing the right technology in the right place.</p> <p>Worldwide there has been little rigorous monitoring of the effects of CSP on birds, and where monitoring has been done, the data are rarely made publically available. What is understood, is that potential impacts could be significant. Impacts include habitat loss, disturbance, displacement, and mortality as a result of impact trauma (e.g. collisions with the reflective heliostats) or solar flux related injuries (i.e. burning). It has also been suggested that the CSP facilities could act as an ecological trap, attracting insects and birds.</p> <p>One of the first power tower facilities to be studied was Solar One (10MW) in California, where the fatality rate has been estimated to be 215 birds per year. More recently, fatality rates at the 377 MW Ivanpah Power Tower Facility in California were estimated to be approximately 3500 birds</p>	<p>Samantha Ralston Birds and Renewable Energy Manager</p> <p>Simon Gear Programme Manager: Policy and Advocacy</p> <p>BirdLife SA</p> <p>Letter: 03-12-2015</p>	<p>The Mattheus-Gat Conservation Area is defined as a natural area in terms of the Ecological Scoping Study. The study site falls outside of this area. The Ecological Study identified the area as an area that is considered of potential high conservation importance due to the presence of Red Data species in these areas and the intrinsic importance of this area. The location of the proposed Paulputs CSP facility on the border of the Mattheus-Gat Conservation Area Important Bird and Biodiversity Area (SA034) will be assessed in the EIA Phase and has been included in the Plan of Study for the EIA.</p> <p>As stated in the Scoping Report there is an operating CSP plant on this same farm portion – KaXu Solar One, as well as a second facility under construction – Xina Solar One. The existing operating CSP plant presented a unique opportunity to understand the nature and extent of avifauna interactions with a CSP facility in this area and specifically on this property. Therefore, although a precautionary approach was taken as part of the ecological assessment, this survey and findings were fully informed by observations at an operational plant.</p> <p>BirdLife SA visited the KaXu facility in October 2015 and so also have a first-hand understanding of the nature of</p>

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	<p>per year. A number of incidental fatalities have also been reported at CSP trough facilities in California (e.g. 183 dead birds were found at the Genesis Solar Plant over a 28 month periods). It is not clear if similar mortality rates will be experienced in South Africa, but a precautionary approach is warranted. We are therefore extremely concerned that the proposed Paulputs CSP facility is located on the border of the Mattheus-Gat Conservation Area Important Bird and Biodiversity Area (SA034). This important fact was not reported in the draft Scoping Report or the avifaunal assessment.</p> <p>Important Bird and Biodiversity Areas (IBAs) are places of international significance for the conservation of birds and other biodiversity. The Mattheus-Gat IBA is one of a few sites protecting both the Red Lark (<i>Certhilauda burra</i>; globally Vulnerable) and Sclater's Lark <i>Spizocorys sclateri</i>; near-threatened). Both are endemic species with restricted ranges. Red Lark inhabits red sand dunes and sandy plains with a mixed grassy dwarf shrub cover while Sclater's Lark occurs erratically on gravel plains. The area around the IBA has been poorly atlased, but the IBA potentially supports 16 of the 23 Namib-Karoo biome-restricted assemblage species and a host of other arid-zone birds. It is seasonally important for nomadic larks, such as Stark's Lark, and sparrow-larks, which are abundant after good rains.</p> <p>IBA trigger species include globally threatened Red Lark, Sclater's Lark, Kori Bustard <i>Ardeotis kori</i>, Ludwig's Bustard <i>Neotis ludwigii</i> and Black Harrier <i>Circus maurus</i>, and regionally threatened Karoo Korhaan <i>Eupodotis vigorsii</i>. Biome-restricted species include Stark's Lark, Karoo Long-billed Lark <i>Certhilauda subcoronata</i>, Black-eared Sparrow-</p>		<p>the area and the birds active in the study area. No concerns regarding this area being fatally flawed for CSP development were raised when on the site.</p> <p>It is noted that Birdlife SA locates the site on the border of the IBA and not within the IBA itself.</p> <p>The avifaunal fieldwork consisted of a six day field study. During this period six vantage point surveys were conducted and transects were conducted in the washes (riparian zones). Red Larks although occurring regionally was not observed during the six day field study. Sclater's Lark is not known to occur in the area and was not observed during the avifaunal field study. Starks lark and sparrow-Larks are known to occur regionally however were not observed during the six day field study.</p> <p>It is noted that although the IBA trigger species are known to occur regionally, however only one – the Sociable Weaver - was observed during the six day field study.</p> <p>Of the biome restricted species none, were observed during the field study, however it is noted that these species are known to occur in the region.</p> <p>There is low abundance and activity in the area, and specifically on this farm portion, primarily as a result of existing and on-going disturbance in the area (that is, 2x CSP facilities plus granite mining activities).</p> <p>The avifauna monitoring programme considers a wet season and a dry season survey, includes Vantage point</p>

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	<p>lark <i>Eremopterix australis</i>, Tractrac Chat <i>Cercomela tractrac</i>, Sickle-winged Chat <i>C. sinuata</i>, Karoo Chat <i>C. schlegelii</i>, Layard's Tit-Babbler <i>Sylvia layardi</i>, Karoo Eremomela <i>gregalis</i>, Cinnamon-breasted Warbler <i>Euryptilasubcinnamomea</i>, Namaqua Warbler <i>Phragmacia substriata</i>, Sociable Weaver <i>Philetairus socius</i>, Pale-winged Starling <i>Onychognathus nabouroup</i> and Black-headed Canary <i>Serinus alario</i>. Additional priority species in the IBA include Martial Eagle <i>Polemaetus bellicosus</i>, Secretarybird <i>Sagittarius serpentarius</i>, Verreaux's Eagle³ <i>Aquila verreauxii</i>, Booted Eagle <i>Hieraetus pennatus</i>, Black-chested Snake Eagle <i>Circaetus pectoralis</i>, Cape Eagle-Owl <i>Bubo capensis</i>, and Spotted Eagle-Owl <i>B. africanus</i>. A pair of Verreaux's Eagles was observed on two consecutive days in that area when BirdLife South Africa visited the IBA in early 2014. In light of the risks associated with CSP projects, particularly power towers, and the uncertainty in predicting impacts, BirdLife South Africa cannot support the development of further CSP projects in, or close to IBAs. There are already at least two CSP (trough) projects (KaXu and Xina) and two PV projects (Konkoonsies 1 and II) on the border of the Mattheus- Gat Conservation Area IBA. Cumulative impacts from renewable energy are therefore a significant concern, adding to existing pressures of overgrazing, drought linked to climate change, powerlines and quad biking.</p> <p>In light of the above, BirdLife South Africa strongly urges that alternative locations for the CSP facility are considered in the EIA. Alternatively, we suggest that this application should be withdrawn.</p>		<p>surveys, conducted over at least 10 days, transects, as well as monitoring at an operational facility, and a second facility under construction.</p> <p>The BirdLife South Africa's draft Best Practice Guidelines for bird and solar energy were not attached to the submission. It is however, noted that the draft guidelines are out for comment until 11 January 2016, and only thereafter will be finalised and circulated for implementation.</p>

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	<p>Should the applicant wish to pursue development of this site we suggest that the burden of proof must be on demonstrating that the project will not negatively impact on any IBA trigger species, or their habitats. This will be hard to do, even with rigorous impact assessment in accordance with BirdLife South Africa's draft Best Practice Guidelines for bird and solar energy (attached), as there is the risk that birds will be attracted to the solar facilities, and seasonal and inter-annual fluctuations in bird populations are likely. The current methods suggested for the avifaunal study are definitely inadequate and more regular field surveys are strongly encouraged, although unlikely to change our position. BirdLife South Africa's position with regards to locating CSP facilities near IBAs and other important bird areas for birds is only likely to change once the results of monitoring existing CSP facilities are made available and we have a better understanding of the impacts and how to mitigate them.</p>		
SOCIAL IMPACTS			
35.	<p>We wish to greet you with happiness and blessings to all of you and your colleagues. We had just saw the news regarding new CPS in 'Die Gemsbok' about projects soon to start within the Khai Ma Municipality area. As we wasn't involve in the meetings and previous discussion we had took the time to do research and read through some of your content as published on your website. The reason for our email is thus:</p> <ul style="list-style-type: none"> » We believe that this position must be filled by someone locally (from within the Khai Ma Municipality). Reason being is that the current CLO of Abengoa / Abeinsa EPC is not from this area and therefore. This is problematic as our people from the Municipality never got the opportunity to partake in such jobs, to be of service in 	<p>A.A. Silo Community Mentoring Forum (CMF)</p> <p>Khai Ma Local Municipality</p> <p>Letter: 20-11-2015</p>	<p>Your comment is noted however it is not the intention of the public participation process to fill a position as you have implied.</p>

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	<p>their own area. Our request and plea is therefore that jobs relating to the upcoming projects, must include mostly local (Pella; Pofadder; Onseepkans; Witbank; Aggeneys; etc.) people, as we believe that they too can do a great job if given the opportunity and skills development.</p> <p>We there request that more public participation must be involve in such job opportunities. We do not want people within jobs to take over where unemployed people could've serve. We also would like to get more information regarding meeting dates, database applications (to inform our local businesses) to ensure that if there is work that local companies can do, privilege should be given to them. Further we would like to request the following:</p> <ol style="list-style-type: none"> 1. More Joint Ventures (JV's) must be implemented with local companies 2. Services such as basic construction, fencing, cleaning services, water purification services, transport, catering should be allocated more to Khai Ma Businesses. We believe that companies do get businesses from outside the Municipality do to such work, where as we do have companies within our sector who are able to such jobs. 3. Labour brokers as you must have heard and know are problematic as we would further like to encourage you to make use of appointing workers straight under you or through joint venture with local labour companies. <p>We believe that we all are feeling the change of perhaps work for the people, and we also need to see that our local business are been lift up for the better of us all.</p>		

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WATER USE LICENSE APPLICATION PROCESS, WATER USES AND PIPELINE			
36.	Will the new pipeline cross any drainage lines?	Shaun Cloete Lower Orange Water Management Area	Infrastructure such as roads and pipelines could possibly cross drainage lines, however this will be confirmed in the EIA phase.
37.	Where will water for the project be sourced?	Department of Water and Sanitation Meeting: 17-11-2015	Water will be required to be abstracted from the Gariep (Orange) River directly. Water sources considered within the Scoping Report include: abstracting water directly from the Gariep (Orange) River; obtaining water from a Khai Ma Local Municipality and direct abstraction from boreholes. Obtaining water from the municipality is not considered as a viable source of water. Groundwater is also not considered a viable water source due to its scarcity and brackish quality.
38.	<p>A non-binding confirmation of water availability letter, stating that a reserve determination study would need to be undertaken, will be provided to the applicant. If there is an existing reserve, permission must be acquired from RDM to use this reserve, as long as the existing reserve is not older than 5 years. Existing reserves were identified for the surrounding projects in the area and could be used to determine the water availability for the project.</p> <p>DWS is required to prioritise the processing of water use applications that are considered strategic water users. Renewable energy projects are identified as strategic water users, therefore water use license applications (WULAs) will be processed faster.</p>		It is noted that the existing reserve would be utilised to determine water availability for the project. A water use license application will be submitted by the applicant in preparation for bidding the project to the Department of Energy's (DoE) Renewable Energy Independent Power Producers Procurement (REIPPP) programme.
39.	Will there be evaporation ponds?		There will be six lined evaporation ponds of approximately 1 ha each at this facility.
40.	Will raw water abstracted from the Orange River be stored on site?		Raw water abstracted from the Gariep/Orange River will be stored in water reservoir/s on site. Section 21(b) of the Water Act (Act No 36 of 1998) will be triggered. This water use will be applied for in the WULA.

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41.	<p>DWS would need to be informed of the type of pump station that would be installed. Will a new pump station be constructed? What type of pump station would be used? How far will it be located from the river bank?</p> <p>Details relating to the pump station will need provided in the WULA.</p>		<p>This level of detail is not yet known and will be provided in the EIA phase.</p>
42.	<p>Will the pipeline traverse along the river bed?</p>	<p>Peter Cloete Research and Developments and</p>	<p>The abstraction point will be located adjacent to the river on the bank. The pipeline will follow the same alignment as the KaXu pipeline, taking the water south to the project site.</p>
43.	<p>Will the project have evaporation ponds? Will monitoring of the evaporation ponds be undertaken during the operational phase?</p>	<p>Conrad Geldenhuys Research and Developments</p>	<p>There will be six evaporation ponds on site. These ponds will be required to be lined, in accordance with the WULA to be made to DWS. Long-term monitoring a leak detection will be undertaken through the operation phase and up to final closure.</p>
44.	<p>Is there an alternative for the pipeline route?</p>	<p>Northern Cape Department of Environment and Nature Conservation</p>	<p>No alternative pipeline routes have been identified by the applicant at this stage because the proposed pipeline will run parallel to the existing KaXu Solar One pipeline within the servitude of the existing R357 Onseepkans road.</p>
45.	<p>Please note that the proposed activity will require a water use authorisation from this department as in terms of Section 21(a), (b), (c), (i) and (h) of the National Water Act (Act 36 of 1998)</p>	<p>Meeting: 19-11-2015</p>	<p>A Water Use License application will be prepared and submitted to the DWS for the planned water uses.</p>
46.	<p>Due to the high number of renewable energy projects that 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 applicants 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</p>	<p>SA Manamthela Lower Orange Water Management Area Department of Water and Sanitation Letter: 18-12-2015</p>	<p>It is noted that the applicant who wishes to submit applications for water use authorisations may 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.</p>

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GENERAL			
47.	What is the generating capacity of the solar facility? What will be the output of the plant? What kind of technology will be used?	Shaun Cloete Lower Orange Water Management Area	The CSP facility will have a generating capacity of up to 200MW. Concentrated Solar Power (with molten salt storage technology) is proposed to be utilised for this project.
48.	When will the applicant bid the project to the DoE?	Department of Water and Sanitation	The applicant intends on bidding this project into Bidding Window 5 in of the REIPPP programme in 2016.
49.	Who is the developer of the proposed project?	Meeting: 17-11-2015	Abengoa Solar Power South Africa is the developer for the project.
50.	Will new roads be constructed?		The MR73 gravel road will need to be realigned in order to accommodate the heliostat field. The site has existing access which was constructed for the KaXu and Xina projects therefore existing roads will be used as far as possible during the construction phase of the Paulputs CSP Project and two alternative access roads have been considered within the Scoping Report (refer to Section 2.4.5).
51.	Will a wet or dry-cooling system be used for this CSP facility?		A dry-cooling system will be used for the proposed project.
52.	What is the development footprint of the neighbouring CSP projects?	Peter Cloete Research and Developments	The existing KaXu Solar One facility is approximately 450ha in extent and the Xina Solar One project, currently under construction, is approximately 600ha in extent.
53.	Why is a new pipeline route being investigated? Why can't the developer use the existing pipeline that provides water to the other two projects?	and Conrad Geldenhuys Research and Developments	Each project is required to be considered a stand-alone facility by the Department of Energy. Shared or common infrastructure is preferred, but would need to be negotiated through the project development process. As such, this EIA must consider a project-specific pipeline, access road, grid connection etc.
54.	Will cumulative impacts be assessed within the EIA?	Northern Cape Department of	A cumulative impact assessment will be undertaken as per the EIA Regulations, 2014.

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55.	Will dust suppression methods be applied?	Environment and Nature Conservation	Dust suppression methods will be applied. The need for measures will be stipulated within the EMPr.
56.	Does the development area fall within the SEA process? It seems that the government is trying to roll out the SEA process in specific areas to streamline renewable energy developments.	Meeting: 19-11-2015	The SEA process for determining REDZ focus areas did not consider CSP technology – only wind and PV. However the project is located within the Eskom “Critical Power” Corridor as identified through the Eskom SEA.
57.	Will the heliostats be constructed on terraces around the tower or will they be constructed on a flat surface?		Terracing is not required for the heliostat field, as is typical for a trough plant facility. Limited vegetation clearing will be required around heliostat pedestals.
58.	How large are the heliostats in comparison to the troughs?		Trough plants comprise rows/trough of mirrors, which are close to ground level and up to 8m in height when in the stowed position. Each heliostat is approximately 36m ² in surface area.
59.	Do the size of the heliostats have an impact on the generation capacity?		All technology providers have varying dimensions for the heliostats. The larger the heliostat, the fewer heliostats are constructed within the heliostat field. The smaller the heliostat, the more are constructed within the field.
60.	<ul style="list-style-type: none"> The Northern Cape Department of Roads and Public Works is the road owner. Realignment of the road will require the following process to be followed; the applicant must apply for realignment of the road on behalf of the road owner. The applicant must arrange a site walk with the DR&PW before the application is submitted. The contact person regarding the realignment application and site walk is Romeo Chivhase (Contact Number: 0790615015). He will be available from 4 January 2015 until 8 January 2015 and then 18 January 2015 onwards. Mr Roberts suggested making contact with Mr Jaco Rudolphse from the Kimberly DR&PW Office (Contact Number: 0768116206) before submitting the application to ensure all requirements are met. 	<p>Harold Roberts District Manager – Department Roads and Public Works</p> <p>Meeting: 17-12-2015</p>	The Department of Roads and Public Works have confirmed that they do not oppose the realignment of the road, and that an application for the realignment of the MR73 may be filed with DENC. The process for the route deterioration will be initiated between the developer and the Department of Roads and Public Works.

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	<ul style="list-style-type: none">• It is important to use the client's letter head in the application.• The application must be addressed to the Namakwa (Springbok) Office. From here the application will be sent to Kimberly office for final assessment.		