

**KAROSHOEK SOLAR ENERGY FACILITY PROJECT
 EIA PHASE COMMENTS AND RESPONSES REPORT**

No.	Issue	Raised by	Response
General			
1.	Logistics and transport of project materials and warehousing. We would like to introduce ourselves as a major role player in the transport and logistics field, not only in the Northern Cape, but also having a national footprint with Warehousing the main centres. It would be much appreciated if we could be registered with FG Emvelo Energy (Edms) Bpk as a vendor on this project, and arrange for a meeting in this regard.	Francois Kempen, Mac Donalds Transport, comment by fax and e-mail, 30 March 2012.	Comment noted. Contact details and request have been passed onto the developer. FG Emvelo will contact you should they wish to meet with your company.
2.	Industry participant. Development consideration.	Nasi Rwigema, Project Manager Solafrika Independent Power Producer, comment by e-mail, 30 March 2012.	Comment noted. Registered on the stakeholder database.
3.	Dear Sir/Madam, 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 AgriL and application facility in future. Detail of your application as captured: Type: Draft Scoping Reports: Karoshoek Solar Valley Your reference number: 14/12/16/3/3/2/292Dated: 23 March 2012. Please use the following reference number in all enquiries: AgriLand reference number: 2012_03_0325	H.J. Buys, pp Director: Land Use and Soil Management, National Department of Agriculture, Forestry and Fisheries, comment by e-mail, 23 March 2012.	Comment noted.

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	Enquiries can be made to the above postal, fax or e-mail address.		
4.	To: Shawn Johnston, Unlike most other Regions, WESSA Northern Cape is unstaffed, and run by a group of volunteers. We currently have nobody on our Committee to handle the Conservation portfolio, and pressure of work means that we are not able to participate in Environmental Impact Assessments at this time. However, we will try to monitor documents sent to us and respond as and when we are able to do so. Please note that a lack of response does not mean that we condone this project; it simply means that we do not have the capacity to respond to all correspondence received. In the interest of saving paper, trees and costs, please do not post any hardcopies or discs to us, unless specifically requested. We cannot currently deal with these and they will be destroyed. Our contact details. Should your project fall outside the Northern Cape Province, consult our website (www.wessa.org.za) for the contact details of the relevant WESSA office. Please do not use the e-mail address se@museumsnc.co.za for WESSA correspondence. Kindly send all documents to WESSA:NC at wessanc@yahoo.com . Our fax (053 842 1433) belongs to the McGregor Museum, and should only be used under exceptional circumstances, and for single pages only. This is a communal machine, so please mark all documents clearly 'WESSA', or direct	Suzanne Erasmus, Chairperson, Wildlife and Environmental Society of South Africa, Northern Cape Branch, comment by e-mail, 02 April and 13 June 2012	Comment noted.

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	them to me by name. We prefer to communicate by e-mail.		
Land Claim by Mr. P. Steenkamp			
5.	After my discussion with Mr. Shawn Johnston I would like to pass the following information on. There was a sale agreement around the Farm 0 of Karos 959 between Mr. P.L.B Steenkamp and Mr. Van Rensburg. Unfortunately the sales contract was unsuccessful due to the neglect of certain agreements. I P.L.B. Steenkamp have restitution rights on the said property and invoke my right to restitution. A dispute has been declared for a claim for restitution on the property, for compensation and loss of income. This information was sent to Mr. Truter of AIDA Properties as well, however Mr. Truter is ignoring it. You can acquire more information about the case, the case number is: 2130/2010 at the High Court in Kimberley. Law suites have been issued and the court case has started on 09 March. I can be contacted at 079 881 9360 and my Advocate Kamie Strydom on 082 524 9133.	P. Steenkamp, Landowner Farm 0 of Karos 959, comment by fax 30 March 2012.	Comments noted. The issue of the land claim will be dealt with by the developer and the landowner outside of the EIA process.
Agriculture and Forestry			
6.	Page 28 of the DSR refers to the Department of Forestry and Fishery (DAFF). Please note it should read Department of Agriculture, Forestry and Fisheries.	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted. Relevant changes made to the FSR.

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7.	The DAFF is mainly concerned about the potential impact on protected tree species. See the National Forest Act of 1998 (NFA) as amended, section 12(1)(d) read with s15(1) and s62(2). The list of protected tree species was published in GN 734 of 16 September 2011.	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted. The ecologist took this into consideration during the EIA phase.
8.	The impact on protected trees must be minimized through careful site selection. If the impact cannot be avoided and numerous protected trees will be affected by the larger Karoshoek Solar Valley development, a biodiversity offset might be required. It is not clear from the DSR what will be the extent of the impact on protected trees. This office is kindly requesting additional information e.g. the number of protected trees that will be affected, to enable us to determine whether a biodiversity offset will be triggered. If an offset is triggered, the DAFF recommends that it will be included in the conditions of the Environmental Authorization. The nature of the offset must be negotiated with the DAFF and the Department of Environment and Nature Conservation Northern Cape (DENC).	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted. There are three tree species protected under the National Forests Act that were observed within the site and may be impacted by the development. The protected tree species observed were <i>Boscia albitrunca</i> and <i>Acacia erioloba</i> and <i>Aloe dichotoma</i> (Refer to Appendix F for ecology report)
9.	The Lower Gariiep Alluvial Vegetation type should be considered a 'no-go' for development due to its 'endangered' status. <i>Gordonia Duneveld</i> should also be excluded from development if possible due to the presence of sand dunes. Drainage lines should be avoided as it may	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted. The Lower Gariiep Alluvial Vegetation will not be impacted by the proposed development. No areas of <i>Godonia Duneveld</i> occur within the proposed development areas, but some areas of this vegetation type occur along the eastern margin of the development areas of

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	contain higher densities of protected trees.		site 1.3. The developer is advised to avoid this vegetation type. Mitigation measures within the EIA report includes "Sensitive areas such as drainage lines should be demarcated by an ecologist prior to construction" (Refer to Appendix F for ecology report).
10.	The developer must note that Environmental Authorization issued by the Department of Environmental does not imply that a Forest Act License will automatically be issued. Forest Act Licenses can be and have been refused in the past.	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted.
11.	The DAFF is kindly requesting copies of the specialist studies that will be conducted during the EIA phase, especially the ecological and/or biodiversity assessment. This office would also like to get a copy of the draft Environmental Management Plan (EMP) to see how the impact on protected trees will be managed.	Jacoline Mans, Chief Forester: NFA Regulation, National Department of Agriculture Forestry and Fisheries Northern Cape, comment by e-mail, 10 April 2012.	Comment noted. The ecology study and draft EMP are appended to the Draft EIA report, which will be submitted to the DAFF for review and comment once available (Refer to Appendix F for ecology report, and Appendix L for the EMP for each site).
12.	Dear Sir/Madam, 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: Larger Karoshoek Valley Solar Park Your reference number: 14/12/16/3/3/1/554 Property Description: Karos 959 Date: 7 May 2012. Please use the following reference number in all enquiries: AgriLand reference number: 2012_05_0146	H.J. Buys, pp Director: Land Use and Soil Management, National Department of Agriculture, Forestry and Fisheries, comment by e-mail, 17 May 2012.	Comment noted.

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	Enquiries can be made to the above postal, fax or e-mail address. Yours sincerely, HJ Buys pp DIRECTOR: LAND USE AND SOIL MANAGEMENT □Online application available at: http://www.agis.agric.za/agriland		
Heritage			
13.	In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer (or mine) to ensure that a Heritage Impact Assessment is done. This must include the archaeological component (Phase1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required. In the Final Scoping Report received by SAHRA it was indicated that the developer will conduct the relevant assessments of the archaeological resources on the properties. A separate assessment will need to be compiled for each of the freestanding developments (Sites 2, 3, 4 and 5), while Sites 1.1, 1.3 and 1.4 can be assessed in a single report.	Katie Smuts and Colette Scheermeyer, South African Heritage Resources Agency, comment by e-mail, 28 May2012.	Comments noted. A heritage impact assessment (HIA) was conducted for the entire Karoshoek Solar Valley Development in a single report. Each site was however assessed separately within the impact assessment section in the HIA. The HIA also took paleontological sites into consideration (refer to appendix H for HIA).

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	<p>The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of this site.</p> <p>No indication was made that a similar assessment would be made of the Palaeontological resources of the area. Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological study must be undertaken to assess whether or not the development will impact upon palaeontological resources or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary. (See attached list of accredited Palaeontologists). A single regional Palaeontological assessment will suffice for all the proposed developments.</p>		

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	<p>If the property is very small or disturbed and there is no significant site the specialist may choose to send a letter to the heritage authority to indicate that there is no necessity for any further assessment.</p> <p>Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p>		