

Power Line for the Grootpoort Photovoltaic Solar Power Plant: Comments and Response Report

Comments received during the 30-day review and comment period of the Basic Assessment Report (02 August - 02 September 2021)

Organisation	Person	Issue or comment raised (see Appendix C5 & C6)	Addressing or incorporation of issue or comment
Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In an email dated 02 August 2021, the following feedback was received from the Mr. Schutte in response to the project:</p> <p>Hereby do we acknowledge your proposed project.</p> <p>For future reference please quote OLKF0420-21.</p>	The response received in terms of the acknowledgement of the project is noted, as well as the reference number which has been allocated to the project.
Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Directorate	Shalot Sekonko	<p>In an email dated 03 August 2021, the following feedback was received from the DFFE: Biodiversity Directorate in response to the Notification of the availability of the BA Report for the project:</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the Notification of Environmental Impact Assessment Process:Power line for the Grootport PV Solar Power Plant near Luckhoff,Free State Province. Kindly note that the project has been allocated to Ms Rabothata (both copied on this email) and myself.</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for the attention of Mr Seoka Lekota.</p>	The feedback from the Biodiversity Directorate is acknowledged, as well as the process of the Directorate for the submission of Public Participation Documents.

Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Directorate	MMatlala Rabothata	<p>In an email dated 23 August 2021, the following request was received from the DFFE: Biodiversity Directorate in response to the Notification of the availability of the BA Report for the project:</p> <p>Kindly provide us with the link/drop box to access the abovementioned report.</p>	Ms. Lisa Opperman from Environamics responded via email on 23 August 2021 and provided the Department with the Dropbox link to access and download the BA report as requested.
Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In an email dated 09 August 2021, the following feedback was received from the Mr. Schutte in response to the project:</p> <p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Openserve) in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>Our Client (Openserve)'s existing infrastructure is affected by this proposal and the route is marked in BLUE on attached sketch as accurately as possible. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not to damage our infrastructure. Therefore any damages occurred during construction of work will be repaired at the customer's account.</p>	<p>Ms. Lisa Opperman from Environamics responded via email on 10 September 2021 acknowledging the comments and requirements raised. It was also confirmed that the information and requirements raised in the correspondence have been submitted to the developer for their records and implementation.</p> <p>The following responses are provided to the comments raised in the correspondence:</p> <p>The approval of the proposed project is noted.</p> <p>It is noted that the development of the proposed power line will affect the existing infrastructure of Openserve. The requirements set out in the comments for work near die infrastructure is not and will be adhered to during the construction phase. The developer also acknowledges these requirements.</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 (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocation will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>Mr Leonard Thikeson must be contacted at telephone number 081 459 5420. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p>	<p>The requirements that have to be met on the completion of the project is noted, including requirements and financial implications for the relocation or alteration of existing infrastructure of Openserve, as per the legislation.</p> <p>Mr Leonard Thikeson will be contacted as required prior to the commencement of construction, and all services will be indicated on site are required.</p>
Affected and surrounding landowner	EJ Dalton	<p>In an email dated 27 August 2021, the following comments were raised by Mr. Dalton on the BA Report:</p> <p>I do not know how all the "experts" that did assessments and reports were able to do it and not one asked permission to visit the proposed 200 x 8 Km area that traverses my farm Excelsior 676. The overgrazed land that i read about in the report must be pointed out to me please.</p> <p>1: I would like to know precisely where water to be used, will come from. Will it be taken from the Sarel Hayward canal and where if so.</p> <p>2: I want to suggest that the 22kV Scheiding to Luckhoff power line be fed from the Grootpoort 132kV substation. It will shorten the supply line and also lower the impedance to Luckhoff and the irrigation farms along the Sarel Hayward canal. That will eliminate the 22kV line that goes through</p>	<p>Ms. Lisa Opperman from Environamix responded via email on 13 September 2021. The following responses were provided:</p> <p>Firstly, more information was requested pertaining to overgrazed areas present within the corridor under assessment. The Terrestrial Biodiversity Report included as Appendix D1 of the Basic Assessment Report identifies two vegetation units within the corridor which have undergone overgrazing. This is the <i>Rhigozum trichotomum shrubveld</i> and the <i>Vachellia tortilis degraded woodland</i>. Figure 11 of the Basic Assessment Report includes a map illustrating the locations of all the vegetation units identified within the corridor. This map was attached to the response email. It was also indicated that these two vegetation units which have been</p>

		<p>irrigable land across my farm Excelsior. A step down transformer will be needed, 132/22 kV.</p>	<p>overgrazed are illustrated on the map, as per the legend provided, and reference was given to the colour used on the map for illustrating the two units.</p> <p>Furthermore, the following responses were provided to points number 1 and 2 raised in the comments:</p> <ol style="list-style-type: none"> 1. For the sourcing of water for the development of the power line the applicant has indicated that water will be obtained from new boreholes that will be sunk at the site where the authorized Grootpoort Solar is located. Alternatively, water will be sourced from the local municipality. No water is proposed to be sourced from the Sarel Hayward Canal. 2. The authorised Grootpoort Solar Power Plant and power line are all "ringfenced" to only be plugged in at the designated points allocated by Eskom, and therefore from a technical perspective they cannot be connected to any other infrastructure that is not a part of the project or project designs. Considering this, it will not be possible to consider an alternative connection. The approach taken as part of the Basic
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Department of Forestry, Fisheries and the Environment (DFFE)	Ms. Thulisile Nyalunga	<p>The Application for Environmental Authorisation and Draft Basic Assessment Report (BAR) dated August 2021 and received by the Department on 02 August 2021, refer.</p> <p><u>This letter serves to inform you that the following information must be included to the final BAR:</u></p> <p>a) <u>Listed Activities and Application Form</u></p> <ul style="list-style-type: none"> Please ensure that all relevant listed activities (per the latest 2021 amendments) are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed. Kindly also expand on the project description in the BAR to provide details of the 	<p>The comments submitted by the Department of Forestry, Fisheries and the Environment on the draft BAR are noted. Responses to the comments and requirements raised by the Department are provided below.</p> <ul style="list-style-type: none"> It is confirmed that all relevant listed activities (including consideration of the amendments gazetted in GNR 517 of 11 June 2021) triggered by the proposed development have been applied for in the amended Application for Environmental Authorisation and included in the revised BA Report available for review and comments.

		<p>associated infrastructure, such as the service road which may impact on watercourses per the listed activities applied for.</p> <ul style="list-style-type: none"> • If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms. • It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. • The list of appendices on page 14 of the application form is misleading. The list of Surveyor General 21-digit codes and farm portions are attached in Appendix 3 instead of Appendix 6. You are requested to amend the list to reflect the correct appendices. • Provide a detailed description of the affected site in the application form, including ward numbers and portion numbers, as required on page 9 of the form. 	<p>A detailed description related to the project is provided for each listed activity applied for. The revised BA Report has been updated to provide more detail on the service road proposed. It must be noted that the service road will be a twin track gravel road up to 4m wide and will therefore not trigger any further listed activities, other than those already applied for.</p> <ul style="list-style-type: none"> • An amended Application for Environmental Authorisation has been submitted to the DFFE with the revised BA Report. The correct Application form has been used. • The relevant commenting authorities have been notified of the Basic Assessment process from the onset of the project and received notification of the availability of the draft BA Report for review and comment. Furthermore, these authorities are also registered on the project database (Appendix C3 of the revised BA Report). Written comments on the draft BA Report were received from the DFFE Biodiversity Directorate and are included and responded to as part of this Comments and Responses Report (the original comment is included in Appendix C5 of the revised BA Report). Figure 6 of the revised report provides an illustration of the relevant geographical areas relevant to the proposed project.
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		<p>b) <u>Layout & Sensitivity Maps</u></p> <ul style="list-style-type: none"> • The locality map provided does not meet the minimum requirements indicated on page 10 of the application form. The map must indicate the following: <ul style="list-style-type: none"> ➤ an accurate indication of the project site position as well as the positions of the alternative sites, if any; ➤ all supporting onsite infrastructure e.g. roads (existing and proposed service road); ➤ road names or numbers of all major roads in the area, as well as the roads that provide access to the site(s); ➤ the location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; ➤ closest town(s); ➤ buffer areas; ➤ all “no-go” areas; ➤ a north arrow; and ➤ a legend. 	<ul style="list-style-type: none"> • The locality map included as Appendix 7 of the amended Application Form has been updated to include the requirements as specified. • The relevant sensitivities and neighbouring renewable energy developments and existing grid infrastructure (where available) has been added to the map. • It is noted it is requested for the bend point coordinates to be added to the locality map, however due to technical constraints on the mapping site and challenges regarding the legibility of the coordinates on the map, this information has rather been included as Appendix 6 of the amended Application for Environmental Authorisation, which ensures that the information is legible and easily understandable.

		<ul style="list-style-type: none"> • The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. Google maps will not be accepted. • Ensure that the GPS co-ordinates (bend points) of the development are provided. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection. 	
		<p>c) <u>Alternatives</u></p> <ul style="list-style-type: none"> • Please note that written proof of an investigation and motivation must be provided if no reasonable or feasible alternatives exist in terms of Appendix 1. Kindly ensure that the best practicable environmental option is selected and that your reasons are not only limited to financial constraints. 	<p>Section 5.1 of the revised BA Report provides the details and feedback of all alternatives considered for the proposed development, which includes the no-go alternative, location alternatives, design and layout alternatives and technology alternatives. Where no reasonable or feasible alternatives are available this has been motivated for.</p> <p>In ensuring that the best practicable environmental option is selected, existing disturbances within the landscape have been considered, as well as the shortest possible route to the grid connection point to reduce impact. The route which the grid connection corridor follows provides an opportunity for the consolidation of linear disturbance and infrastructure within the landscape based on the presence of the R48 regional road which is parallel to the assessed route. No reasons in terms of limited financial constraints have been included in the consideration of alternatives.</p>

		<p>d) <u>Specialist Assessments</u></p> <ul style="list-style-type: none"> • Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation. • The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted. • It is noted that the avifaunal study is marked as a draft, that it is a preliminary desktop assessment, not the final assessment, and that it was not confirmed by a site visit. Please note that all specialist studies must be final and must not recommend further assessments to be completed post authorisation. The avifaunal specialist assessment must be a final version, verified by a site visit, and must also be provided to I&APs for comment. Your attention is drawn to the provisions of regulation 19(1)(b) in this regard. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons, and where necessary, include further expertise advice. • It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government 	<ul style="list-style-type: none"> • The specialist studies included as part of the revised BA Report (Appendix D), provides the details of the methodology used for the study, as well as the details of all infrastructure considered and assessed. • The specialist studies (Appendix D of the revised BA Report) provide the details of any limitations and gaps associated with the studies. All studies have been conducted in the correct season and no gaps in this regard are noted. • The gaps in the avifauna specialist study are noted. It can be confirmed that the revised BA Report includes the final Avifauna Impact Assessment, inclusive of fieldwork, (Appendix D3) which has been made available for review and comment to all registered I&APs. The EAP notified the DFFE of the applicability of Regulation 19(1)(b) on 09 September 2021, which was acknowledged by the Department on 16 September 2021. • No contradicting recommendations have been specified by the appointed specialists. Therefore, this comment is not applicable. • The specialist studies (Appendix D of the revised BA Report) which require to be undertaken in terms of the Protocols have complied with this requirement. The relevant specialists are also SACNASP
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		<p>e) <u>Cumulative Assessment</u></p> <ul style="list-style-type: none"> • Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following: <ul style="list-style-type: none"> ➢ Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. 	<ul style="list-style-type: none"> • Similar projects within a 30km radius from the project are present to the south (Section 7.4.1 of the revised BA Report). The entire Section 7 of the revised BA Report considers the cumulative impacts associated with the development. The requirements of the Department are met in this section as per the points below: <ul style="list-style-type: none"> ➢ The identified cumulative impacts associated with the development are

		<ul style="list-style-type: none"> ➤ Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. ➤ The cumulative impacts significance rating must also inform the need and desirability of the proposed development. ➤ A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>defined and discussed in Sections 7.5 and 7.6 of the revised BA Report. This includes an indication of the significance ratings.</p> <ul style="list-style-type: none"> ➤ The process flow is included as Figure 7.2 of the revised BA Report. ➤ The cumulative impact significance is considered within section 4.2 (Section 4: Need and Desirability). Refer to the last point of discussion under this section for the required information. ➤ Section 7.7 of the revised BA Report provides a conclusion regarding the cumulative impacts, as well as a overall cumulative impact environmental statement.
		<p>f) <u>Undertaking under Oath</u></p> <ul style="list-style-type: none"> • The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. Please note that the final BAR must also have an undertaking under oath/ affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include: <i>"an undertaking under oath or affirmation by the EAP in relation to:</i> <ul style="list-style-type: none"> ➤ <i>the correctness of the information provided in the reports;</i> 	<ul style="list-style-type: none"> • The undertaking under oath by the EAP (administered by a Commissioner of Oaths) is included in Appendix A of the revised BA Report. The DFFE official template for the undertaking under oath has been used.

		<ul style="list-style-type: none"> ➤ <i>the inclusion of comments and inputs from stakeholders and I&APs;</i> ➤ <i>the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> ➤ <i>any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.</i> 	
		<p>g) <u>Public Participation Process</u></p> <ul style="list-style-type: none"> • The BAR indicates that the team is still in process of identifying and making contact with some affected and surrounding landowners, whose contact information is not obtainable through Windeed searches and other means, and that this process will be completed to ensure notification of all affected and surrounding landowners. Please ensure that all affected landowners have been notified of the application and have been provided with an opportunity to comment on the draft BAR, per regulation 41(2)(b) of the EIA Regulations, 2014. Your attention is drawn to the provisions of regulation 19(1)(b) in this regard. • Please ensure that the following information is included in the final BAR: <ul style="list-style-type: none"> ➤ Proof of a newspaper advert, site notices and written notification letters to the landowners; ➤ A list of registered interested and affected parties (I&APs) as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; ➤ Copies of all comments received during the draft BAR comment period; and ➤ A comment and response report which contains all comments received and responses provided to all 	<ul style="list-style-type: none"> • The Environamics team have undertaken consultation with the local agricultural co-operation to obtain further information regarding the relevant landowners (section 5.2.1 of the revised BA Report). The I&AP database (Appendix C3) has been updated where information has become available. For proof of correspondence with the local agricultural cooperative please refer to Appendix C4 of the revised BA Report. It must be noted the DFFE was notified of Regulation 19(1)(b) for the project on 09 September 2021, and acknowledgement from the Department was received on 16 September 2021. • The following information, as requested, is included in the revised BA Report: <ul style="list-style-type: none"> ➤ Proof of the placement of the newspaper advert in the Bloem Nuus newspaper is included as Appendix C1 of the revised BA Report. Proof of the placement of site notices is included in

		<p>comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.</p> <ul style="list-style-type: none"> • Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended and the approved public participation plan. • Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za) in respect of the proposed activity are adequately addressed in the final BAR. 	<p>Appendix C2 of the revised BA Report. And proof of the written notices submitted to landowners and other means of communication are included in Appendix C4 of the revised BA Report.</p> <ul style="list-style-type: none"> ➤ The list of registered I&APs is included as Appendix C3 of the revised BA Report. ➤ Copies of all original comments received on the draft BA Report during the 30-day review and comment period is included in Appendix C4 (email correspondence) and Appendix C5 (formal written comments) of the revised BA Report. ➤ This comments and Responses Report (Appendix C4 of the revised BA Report) contains all comments received (including those from the DFFE) during the 30-day review period of the draft BA Report (as well as the comments received prior to the 30-day review and comment period), as well as the responses provided from the project team. • Proof of correspondence with all the various stakeholders of the project is included in Appendix C4 of the revised BA Report, including proof of the attempts made to obtain comments. The public participation process has been undertaken in line with the
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			<p>Regulations and the approved public participation plan.</p> <ul style="list-style-type: none"> • All issues raised on the draft BA Report have been addressed and considered within the revised BA Report accordingly. Further comments received during the 30-day review and comment period of the revised BA Report will be included, considered and addressed in the final BA Report to be submitted to the DFFE for decision-making.
		<p>h) <u>Environmental Management Programme</u></p> <ul style="list-style-type: none"> • Please ensure that any specific mitigation measures identified in the BAR and specialist reports are incorporated into the site-specific section of the generic Environmental Management Programmes (EMPr) (contemplated in Regulations 19(4) for substation and overhead electricity transmission and distribution infrastructure). • Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr (for the construction and post-construction monitoring phases), and for the submission of such compliance reports to the competent authority. 	<ul style="list-style-type: none"> • The site specific mitigation measures, not covered by the generic mitigations provided for in the generic EMPrs for the development of a power line and substation, are included in Part C of Appendix F1 and Appendix F2 of the revised BA Report. • The recommendations regarding the auditing of compliance with the EA and EMPr and submission of compliance reports are included in Part C, Section 8.5 of Appendix F1 and Appendix F2 of the revised BA Report.
		<p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised, as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p>	<ul style="list-style-type: none"> • The information required has been included under Section 8.2 of the revised BA Report.

		Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.	<ul style="list-style-type: none"> The prescribed timeframes of the Regulations for the Basic Assessment process are noted. It must be noted the DFFE was notified of Regulation 19(1)(b) for the project on 09 September 2021, and acknowledgement from the Department was received on 16 September 2021.
		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.	<ul style="list-style-type: none"> It is noted and acknowledged by the Applicant that no activity may commence prior to obtaining an Environmental Authorisation.
Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Directorate	Ms. M Rabothata / Mr. S Lekota	The following comments were received by the DFFE: Biodiversity Directorate via email on 02 September 2021.	Responses to the comments are provided in the rows below.
		Based on the information provided in the report, most of the powerline footprint falls within Ecological Support Areas (ESA1). The site is classified as Northern Upper Karoo and a small section of the vegetation type Besemkaree Koppies Shrubland. The Northern Upper Karoo is classified as Least threatened. The proposed site for the development varies from being in a completely modified to slightly degraded state with the project area having medium-high sensitivity and with the implementation of mitigation measures that would reduce these impacts from a higher to a lower significance.	It is noted that the Department considers that with the implementation of appropriate mitigation measures the impact significance can be reduced.
		<p>Notwithstanding the above, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> The proposed layout plan of the development must be consistent with the sensitivity map. 	<ul style="list-style-type: none"> Figure 6 of the revised BA Report includes the layout map of the proposed development, overlain with the sensitivities of the area to be affected.

		<ul style="list-style-type: none"> • An avifaunal specialist must be consulted to conduct a detailed specialist study for the project area and monitoring of the potential impact of the power line and findings of the impact assessment ratings as well as a clear impact statement be included in the final report. • Preconstruction walk-through of the approved development footprint must be conducted to ensure that sensitive habitats and species are avoided where possible. • Alien Invasive plant species management and Rehabilitation plans must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion. • Permits from relevant authorities must be obtained for the removal or disturbance of any TOPs, Red Data listed or provincially protected species. • Appropriate buffer must be established around medium sensitive habitats, i.e. Drainage channels and riparian zones. • Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Drainage features). • A detailed wetland assessment should be conducted to determine the exact edges of potential wetlands and drainage channels. 	<ul style="list-style-type: none"> • The final Avifauna Impact Assessment Report (Appendix D3 of the revised BA Report) includes a detailed study, based on field survey, as well as confirmed impact assessment ratings and an overall impact statement. • The requirement for a pre-construction walk-through of the final development footprint is noted. This requirement has been included in Section 8.1.1 of both Appendix F1 and Appendix F2 of the revised BA Report. • An Alien Invasive plant species management and Rehabilitation plan is included as Appendix F3 of the revised BA Report made available to the DFFE Biodiversity Directorate for a 30-day review and comment period. This plan will also be submitted with the final BA to the DFFE for decision-making. • The need to obtain permits from the relevant authorities for the removal or disturbance of any protected species is noted. This requirement has been included in Section 8.1.1 of both Appendix F1 and Appendix F2 of the revised BA Report. • The drainage channels and riparian zones present within the grid connection corridor are all considered as being of a high sensitivity by the wetland specialist
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			<p>(Appendix D2 of the revised BA Report). The specialist has recommended that a buffer zone of 32 meters should be implemented around the drainage channels and riparian zone to prevent sediment changes to the channels. No activities or disturbance may take place within the 32m buffer.</p> <ul style="list-style-type: none"> • The wetland specialist has recommended that a buffer zone of 32 meters should be implemented around the drainage channels and riparian zone to prevent sediment changes to the channels. No activities or disturbance may take place within the 32m buffer. Refer to Appendix D2 of the revised BA Report. • A detailed Wetland Impact Assessment and Risk Assessment (Appendix D2 of the revised BA Report) has been undertaken as part of the BA process. The report specifically identifies the locations of wetlands and drainage features within the grid connection corridor.
		<p>In conclusion please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.</p>	<p>The process for the submission of all Public Participation Process documents is noted and will be followed accordingly.</p>

<p>South African Heritage Resources Agency (SAHRA)</p>	<p>Sityhilelo Ngcatsha</p>	<p>In a letter dated 01 September 2021, the following final comments were provided by SAHRA on the proposed project:</p> <p>Final Comment</p> <p>The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EMP:</p> <ul style="list-style-type: none"> • 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development; • 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development; • 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Sityhilelo Ngcatsha/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule; • 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the 	<p>The final comments made by SAHRA are noted and have been included in the EMP(s) of the project as relevant. Refer to the responses below:</p> <ul style="list-style-type: none"> • It is noted that there are no objections to the proposed development. • It is noted that the specialist recommendations are supported and that no further conditions are provided. • The requirements for a situation where evidence is found has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • The requirements for a situation where unmarked human burial are uncovered has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • Section 51(1) of the NHRA is noted in terms of offences. • The conditions that apply with regards to the appointment of specialists has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • The final BA Report will be uploaded to SAHRIS once available. • The decision on the Application for Environmental Authorisation will be uploaded to SAHRIS once available.
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Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In a letter dated 09 August 2021, the following comments were raised by Mr. Schutte in response to the project:</p> <p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Openserve) in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p>	<p>Ms. Lisa Opperman from Environamics responded via email on 10 September 2021 acknowledging the comments and requirements raised. It was also confirmed that the information and requirements raised in the correspondence have been submitted to the developer for their records and implementation.</p>

		<p>Our Client (Openserve)'s existing infrastructure is affected by this proposal and the route is marked in BLUE on attached sketch as accurately as possible. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not to damage our infrastructure. Therefore any damages occurred during construction of work will be repaired at 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 (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocation will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>Mr Leonard Thikeson must be contacted at telephone number 081 459 5420. Two (2) 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 /</p>	<p>The following responses are provided to the comments raised in the correspondence:</p> <p>The approval of the proposed project is noted.</p> <p>It is noted that the development of the proposed power line will affect the existing infrastructure of Openserve. The requirements set out in the comments for work near die infrastructure is not and will be adhered to during the construction phase. The developer also acknowledges these requirements.</p> <p>The requirements that have to be met on the completion of the project is noted, including requirements and financial implications for the relocation or alteration of existing infrastructure of Openserve, as per the legislation.</p> <p>Mr Leonard Thikeson will be contacted as required prior to the commencement of construction, and all services will be indicated on site are required.</p> <p>The validity of the approval is noted, as well as the process should construction commence after six months. The requirements where changes or deviations are relevant to the power line prior to construction is also noted.</p>
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South African Radio Astronomy Observatory (SARAO)	Mr. Selaelo Matlhane	<p>In a letter dated 03 September 2021, received via email on 16 September 2021, the following comments were raised by SARAO on the draft Basic Assessment Report:</p> <p>This letter is in response to the proposed solar facility and its possible impact on the Square Kilometre Array radio telescopes.</p> <p>SARAO has undertaken a high-level impact assessment concerning the development of a single circuit power line connecting the solar facility to the national grid network. Based on the information provided it was determined that the project represents a low risk of interference to the SKA radio telescope with a compliance surplus of 66.75 dBm/Hz. As such, we do not have any objection to the proposed project.</p>	<p>It is noted that the proposed power line poses a low risk of interference to the SKA radio telescope and that there is no objection from SARAO towards the project. No further response required.</p>

Comments received prior to the release of the Basic Assessment Report for the 30-day review and comment period

Organisation	Person	Issue or comment raised (see Appendix C5 & C6)	Addressing or incorporation of issue or comment
Department of Forestry, Fisheries and the Environment	BC Admin	<p>In an email dated 29 July 2021, the following request was received from the DFFE: Biodiversity Directorate in response to the Notification of the EIA process for the project:</p>	<p>Ms. Lisa Opperman from Environamix responded via email on 29 July 2021 confirming that the DFFE Directorate: Biodiversity Conservation is registered on the project</p>

(DFFE): Biodiversity Directorate		DFFE Directorate: Biodiversity conservation would like to register as the I&AP for the mentioned project. Kindly notify us as soon as the report becomes available.	database and will therefore receive notification of the availability of the BA Report once available for review and comment.
Letsemeng Security	Eunice Dibe	In an email dated 30 July 2021, in response to the Notification of the EIA process for the project, the I&AP indicated the following: I am interested.	Ms. Lisa Opperman from Environamics responded via email on 02 August 2021 and acknowledged the interest of the I&AP on the project and confirmed that the I&AP has been registered on the project database.
Eskom	John Geeringh	In an email dated 29 July 2021, the following feedback was received from Eskom in response to the Notification of the EIA process for the project: Please send me a KMZ file of the proposed grid connection. Please find attached Eskom general requirements for works at or near Eskom infrastructure and servitudes	It can be confirmed that the Eskom general requirements for work at or near Eskom Servitudes and Infrastructure has been submitted to the Applicant for their consideration and implementation. The KMZ (Google Earth) file requested of the proposed grid connection was submitted to Mr. Geeringh via email by Ms. Lisa Opperman on 02 August 2021.
Mvelaphande Trading (representing Telkom)	Chris Schutte	In an email dated 29 July 2021, the following request was received from Mr. Schutte in response to the Notification of the EIA process for the project: We need to print the sketches and if there are infrastructure affected we need to indicate it on the sketches, please supply us with sketches in A3 and pdf format.	Ms. Lisa Opperman from Environamics responded via email on 02 August 2021 and acknowledged the email. The footprint map illustrating the larger grid connection corridor, as being assessed as part of the BA process, was submitted to the party as well.