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**RE: REQUEST FOR AMENDMENT TO THE SAHRA HRC – KOUGA WIND ENERGY FACILITY:
ARCHAEOLOGY SECTION
(SAHRA REF: 9/12/044/0001; DEA REF: 12/12/20/1756)**

The Archaeology Section of the SAHRA HRC (Heritage Review Comment) – Kouga Wind Energy Facility (dated 2011-02-23) based on the 'CHIA – Establishment of a Commercial Wind Farm, Kouga Local Municipality, Eastern Cape, South Africa' (ArchaeoMaps – 2010-12-31) refers. SAHRA Recommendations on the report is subdivided according to the 3 development clusters, namely the Eastern Cluster, the Central Cluster and the Western Cluster. With reference to the SAHRA Recommendations for the Central Cluster the HRC states that:

- o *'Either the positions of turbines 33, 36, 41, 48 and 40 is shifted north away from the dunes; or*
- o *A Phase 2 is undertaken in the form of test excavations to better understand the sensitivity of this zone located between the dune system and Site 2.3..'*

The project proponent, Red Cap Investments, would at present prefer the Phase 2 test excavation Site Management option above repositioning of the turbines. However, while sensitivity of sub-surface deposits may well be expected in the vicinity of Turbine Line 33-36, the current Turbine Line 40-41-48 mainly follows an eroded portion of the dune, where sandy deposits have been eroded down to the mudstone (geological / palaeontological) level, implying thus that development will take place on archaeological basal layers (turbines will be anchored in stone not in the dune deposits): Test pit excavations in this area will not yield archaeological data.

It the light of the above it is requested that SAHRA reconsiders the request for test excavations to only include excavations along the Turbine Line 33-36, and that the current request for test excavations along Turbine Line 40-41-48 be reconsidered against monitoring of the Turbine Line only. (Possible sensitivity of the dune remains undeniable; but at present envisioned to a monitoring and recording level rather than a test pit requirement. Both micro-siting and on-site archaeological monitoring has been recommended for the Turbine Line 41-41-48 area, implying that the northern part of the dune will be monitored on at least 2 occasions during the course of development to record possible exposures and make recommendations with regards thereto if necessary.)

[In addition geo-referenced data from both the Thuyspunt development (ACO UCT 2010 – now available on the net, but not at the time of the CHIA report submission) and the Melkhout-Oysterbay Transmission Line (Anderson 2010, as referenced in the CHIA report) indicates that the western part of the dune system (Turbine Line 40-41-48) seems less sensitive that the eastern part of the dune system (Turbine Line 33-36). However,

dune landscapes are known to be rapidly changing environments and continuing recording thereof will further our understanding of the dune system – See Kouga Commercial Wind Farm .kmz file]



Figure 1: Turbine localities 33, 36, 40, 41 and 48 in relation to recorded sites (Kouga Commercial Wind Farm, Thuspunt and Melkhout-Oysterbay TL)



Figure 2: Thick sandy overburden along Turbine Line 33-36 (1)



Figure 3: Thick sandy overburden along Turbine Line 33-36 (2)



Figure 4: Shallow geological layers along Turbine Line 41-41-48



Figure 5: Shallow mudstone (dark red) levels along Turbine Line 41-41-48 (1)



Figure 6: The intersection between the Aeolian dune and the mudstone levels of Turbine Line 40-41-48

I trust SAHRA will consider the abovementioned request for revision of the SAHRA HRC comment to Phase 2 test pitting along Turbine Line 33-36 and archaeological monitoring for Turbine Line 40-41-48 in the light of restrictions imposed on possible outcomes of test pit excavation in the archaeological basal members of the Turbine Line 40-41-48 area.

Yours sincerely,

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