SITE ALTERNATIVE MOTIVATION FOR THE PROPOSED BORROW-PITS ESTABLISHMENT FOR THE PREVENTATIVE MAINTENANCE OF EXISTING D192 ROAD.

RAL/T1255/2021

Prepared for: Roads Agency Limpopo SOC Ltd



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DOCUMENT TITLE:

Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.

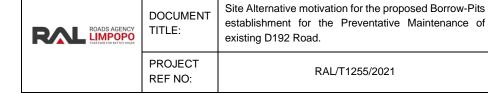


PROJECT REF NO:

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1. INTRODUCTION

1.1 Background

Roads Agency Limpopo SOC Limited (RAL) is proposing to undertake preventative maintenance of road D192 within Mokgalakwena Local Municipality in Waterberg District Municipality of Limpopo Province. The proposed preventative maintenance will require gravel material that will be sourced from the seven (07) identified Borrow pits (BP) along the D192 road. Mamadi and Company (Pty) Ltd (thereafter referred to as Mamadi) has been appointed as Independent Environmental Consultants to manage and submit the Basic Assessment Reports for the proposed Borrow-pits. The Basic Assessments reports were compiled and subjected to 30days review period. Comments were received from the Limpopo Department of Economic Development, Environment and Tourism (LEDET), recommending that an Ecological Assessment be undertaken for BP 2, BP 3, BP 4, BP 6, and BP 7. (Refer to **Appendix A** for the LEDET comments)

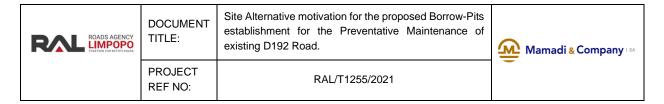
1.2 Purpose of the report

The purpose of the report is to provide the Department of Mineral Resources and Energy (DMRE) with the motivation for the site alternative and motivation for not undertaking the Ecological Assessment study.

2. CONSIDERED SITE ALTERNATIVES AND MOTIVATION

The site alternative was undertaken considering the following aspects:

- Biodiversity Impact,
- Socio-Economic Impact, and
- Heritage Impact.

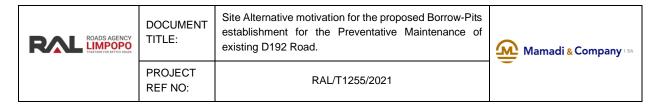


2.1 Borrow pit 2 Alternatives

2.1.1 Borrow pit 2 (Preferred site)

The proposed BP 2 is located on Portion 00003 Farm Olifantsklip 801 LR, within Rantlakane village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Ecological Support Area	
	1 (ESA 1) in terms of the Waterberg Bioregional Plan (WBP) gazetted in	
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.	
	Although the area is within ESA 1, the specific site was selected considering	
	that the vegetation is sparse as compared to the surrounding area.	
	The potential impacts associated with the borrow-pit activities has been	
	assessed and possible mitigation measures has been provided in the EMPr.	
	There is an existing access road, which will be widened to accommodate the	
	trucks movement, this will minimize the removal of vegetation for the access	
	road.	
Socio-Economic	The current land use of the area comprises of sparse vegetation, graveyard	
	within 100m of the proposed site. Residential areas situated within 500m of	
	the proposed BP 2 site. The site is within 500m of the D192 road where the	
	material will be transported for use, and this will minimize the cost for	
	transporting material to the working area.	
	RAL has appointed a Geotechnical Specialist to investigate the availability	
	of the required gravel material, and the findings of the reports indicate that	
	the site has enough of the required material.	
	The proposed site was selected with the assistance from the tribal authority	
	as the suitable site for the proposed Borrow-pit activity.	
Heritage	A Heritage Impact Specialist was appointed to assess the availability of	
	heritage and archeological features that may be impacted by the project. The	
	findings of the study indicated that there are no heritage or archeological	
	features within the identified site, however, there are community graves	



within 100m of the site. The graves will be demarcated with a danger tape
during construction.

Overall motivation of the preferred site

The proposed site was selected as the preferred site considering that the following:

- The site will have minimal negative impacts on the Ecology of the area; however, the necessary
 mitigation measures has been provided in the EMPr to minimize the impacts;
- The location of the site is within reasonable distance from the community;
- The site was selected with the help of the of the traditional authority;
- RAL has already invested funds on the specialist studies already undertaken on the proposed site and
- There are no Heritage or Archeological features identified within the proposed site.

2.1.2 Borrow-pit 2 (Alternative site)

The proposed alternative BP is located on Portion 00003 Farm Olifantsklip 801 LR, within Rantlakane village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Ecological Support Area	
	1 (ESA 1) in terms of the Waterberg Bioregional Plan (WBP) gazetted in	
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.	
	The site has dense vegetation and topography is slope. There is no access	
	road to the proposed site, and vegetation clearance will be required for the	
	access road. The potential impacts associated with borrow-pit will have	
	adverse impacts on the ecology and stability of the site.	
Socio-Economic	The current land use of the area comprises of dense vegetation, graveyard	
	within 100m of the proposed site and a reservoir with 50m of the proposed	
	site. Residential areas situated within 300m of the proposed BP site. The	
	site is within 300m of the D192 road where the material will be transported	
	for use, and this will minimize the cost for transporting material to the working	
	area.	

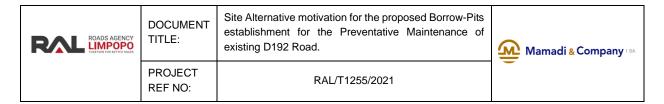
ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 154
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	The tribal authority has not given consent for the use of the proposed site a	
	such the Geotechnical investigation was not undertaken and the availability	
	of the required material is not known.	
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed	
	site, however, there are community graves within 100m of the site.	

Overall motivation of not considering the proposed site

The proposed alternative site was not selected as the preferred site considering that the following:

- The Ecological and site stability of the site will have severe impacts on the environment;
- The tribal authority has not given consent for the proposed site;
- The availability of the required gravel material is not known; and
- The Heritage status of the site is not known.



2.2 Borrow pit 3 Alternatives

2.2.1 Borrow pit 3 (Preferred site)

The proposed BP 3 is located on Portion 00001 Farm Olifantsklip 801 LR, within Rantlakane village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Ecological Support Area	
	1 (ESA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in	
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.	
	Although the area is within ESA 1, the specific site was selected considering	
	that part of the proposed site has already been disturbed by previous	
	Borrow-pit activities. The potential impacts associated with borrow-pit	
	activities has been assessed and possible mitigation measures has been	
	provided in the EMPr. The site already has an existing access road, this will	
	minimize the removal of vegetation for the access road.	
Socio-Economic	There is illegal dumping of building rubble on existing Borrow-pit area. The	
	residential area is situated within 800m of the proposed BP site. The site is	
	within 600m of the D192 road where the material will be transported for use,	
	and this will minimize the cost for transporting material to the working area.	
	RAL has appointed a Geotechnical Specialist to investigate the availability	
	of the required gravel material, and the findings of the reports indicate that	
	the site has enough of the required material.	
	The proposed site was selected with the assistance from the tribal authority	
	as the suitable site for the proposed Borrow-pit activity.	
Heritage	A Heritage Impact Specialist was appointed to assess the availability of	
	heritage and archeological features that may be impacted by the project. The	
	findings of the study indicated that there are no heritage or archeological	
	features within the identified site.	
Overall motivation of the preferred site		
The proposed was selected as the pre	eferred site considering that the following:	

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- Part of the proposed site have already been disturbed by previous Borrow-pit activities;
- There is an existing access road;
- The location of the site is within reasonable distance from the community;
- The site was selected with the assistance of the traditional authority;
- RAL has already invested funds on the specialist studies already undertaken on the proposed site and
- There are no Heritage or Archeological features identified within the proposed site.

2.2.2 Borrow-pit 3 (Alternative site)

The proposed alternative BP 3 is located on Portion 00001 Farm Olifantsklip 801 LR, within Rantlakane village.

ASPECT	IMPACT		
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)		
,	vegetation which is vulnerable in terms of Vegetation Conservation Status		
	(SANBI, 2008). The site is in an area classified as Ecological Support Area		
	1 (ESA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in		
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.		
	The site has no indigenous vegetation remaining and the area is currently		
	used for agricultural farming. The potential environmental impacts		
	associated with borrow-pit activities will be insignificant.		
Socio-Economic	The current land use is agricultural area with residential areas situated within		
Socio-Economic			
	400m of the proposed BP site. The site is within 300m of the D192 road		
	where the material will be transported for use, and this will minimize the cost		
	for transporting material to the working area. The proposed site is used for		
	agricultural purpose by the community members.		
	The tribal authority has not given consent for the use of the proposed site as		
	such the Geotechnical investigation was not undertaken and the availability		
	of the required material is not known.		
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed		
Overall motivation of not considering the proposed site			
The proposed alternative was not selected as the preferred site considering that the following:			
The site is utilised for agricul	The site is utilised for agricultural purpose;		

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company I SA
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- The tribal authority has not given consent for the proposed site;
- The availability of the required gravel material is not known; and
- The Heritage status of the site is not known.

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2.3 Borrow pit 4 Alternatives

2.3.1 Borrow pit 4 (Preferred site)

The proposed BP 4 is located on Portion 0 of Farm Hermasdal 789 LR, within Basterspad village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Ecological Support Area	
	1 (ESA 1) and ESA 2 in terms of the Waterberg Bioregional Plan (WBF	
	Gazetted in Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA	
	1.	
	The area classified as ESA 2 (which comprise approximately 50% of the 5ha	
	area), has already been disturbed. The potential impacts associated with	
	borrow-pit has been assessed and possible mitigation measures has been	
	provided. There is an existing access road, which will widened to	
	accommodate the trucks movement, and this will minimize the removal of	
	vegetation for the access road.	
Socio-Economic	Currently there are no activities taking place on the proposed site, however,	
	there are residential areas situated within 700m of the proposed BP site. The	
	site is within 700m of the D192 road where the material will be transported	
	for use, and this will minimize the cost for transporting material to the working	
	area.	
	RAL has appointed a Geotechnical Specialist to investigate the availability	
	of the required gravel material, and the findings of the reports indicate that	
	the site has enough of the required material.	
	The proposed site was selected with the assistance from the tribal authority	
	as the suitable site for the proposed Borrow-pit activity.	
Heritage	A Heritage Impact Specialist was appointed to assess the availability of	
	heritage and archeological features that may be impacted by the project. The	
	findings of the study indicated that there are no heritage or archeological	
	features within the identified site.	
Overall motivation of the preferred site		

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The proposed site was selected as the preferred site considering that the following:

- Part of the proposed site have already been disturbed;
- There is an existing access road;
- The location of the site is within reasonable distance from the community;
- The site was selected with the assistance of the traditional authority;
- RAL has already invested funds on the specialist studies already undertaken on the proposed site and
- There are no Heritage or Archeological features identified within the proposed site.

2.3.2 Borrow-pit 04 (Alternative site)

The proposed alternative BP 4 is located on Portion 0 of Farm Hermasdal 789 LR, within Basterspad village.

ASPECT	IMPACT
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)
	vegetation which is vulnerable in terms of Vegetation Conservation Status
	(SANBI, 2008). The site is in an area classified as Ecological Support Area
	2 (ESA 2) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.
	The site has no indigenous vegetation remaining and is currently used for
	agricultural farming. The potential environmental impacts associated with
	borrow-pit activities will be insignificant.
Socio-Economic	The current land use of the site is agricultural with residential areas situated
	within 500m of the proposed BP site. The site is within 500m of the D192
	road where the material will be transported for use, and this will minimize the
	cost for transporting material to the working area. The proposed site is used
	for agricultural purpose by the community members.
	The tribal authority has no given consent for the use of the proposed site as
	such the Geotechnical investigation was not undertaken and the availability
	of the required material is not known.
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed
	site.
Overall motivation of not considering	the proposed site
The proposed was not selected as th	e preferred site considering that the following:

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company I SA
	PROJECT REF NO:	RAL/T1255/2021	

- The site is utilised for agricultural purpose;
- The tribal authority has not given consent for the proposed site;
- The availability of the required gravel material is not known; and
- The Heritage status of the site is not known.

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 15A
	PROJECT REF NO:	RAL/T1255/2021	

2.4 Borrow pit 6 Alternatives

2.4.1 Borrow pit 6 (Preferred site)

The proposed BP 6 is located on Farm Jakhalskuil, 754 LR & Farm Schuurmanshoogte 792LR Jakkalskuil village.

ASPECT	IMPACT
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)
	vegetation which is vulnerable in terms of Vegetation Conservation Status
	(SANBI, 2008). The site is in an area classified as Critical Biodiversity Area
	1 (CBA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019.
	There have been vegetation clearance activities observed around the
	proposed site. The potential impacts associated with borrow-pit has been
	assessed and possible mitigation measures has been provided. There is an
	existing access road, that cut across the proposed Borrow-pit site, and this
	will minimize the removal of vegetation for the access road.
Socio-Economic	There are no activities taking place on the proposed site, except firewood
	collection by the community. There is residential area situated within 100m
	of the proposed BP site. The site is within 100m of the D192 road where the
	material will be transported for use, and this will minimize the cost for
	transporting material to the working area.
	RAL has appointed a Geotechnical Specialist to investigate the availability
	of the required gravel material, and the findings of the reports indicate that
	the site has enough of the required material.
	The proposed site was selected with the assistance from the tribal authority
	as the suitable site for the proposed Borrow-pit activity.
Heritage	A Heritage Impact Specialist was appointed to assess the availability of
	heritage and archeological features that may be impacted by the project. The
	findings of the study indicated that there are no heritage or archeological
	features within the identified site.
Overall motivation of the preferred site	
The proposed site was selected as the	e preferred site considering that the following:

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 154
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- Part of the proposed site have already been disturbed by vegetation clearance activities;
- There is an existing access road;
- The location of the site is within reasonable distance from the community;
- The site was selected with the assistance of the traditional authority;
- RAL has already invested funds on the specialist studies already undertaken on the proposed site and
- There are no Heritage or Archeological features identified within the proposed site.

2.4.2 Borrow-pit 6 (Alternative site)

The proposed alternative BP 6 is located on Farm Jakhalskuil, 754 LR & Farm Schuurmanshoogte 792LR Jakkalskuil village.

ASPECT	IMPACT		
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)		
	vegetation which is vulnerable in terms of Vegetation Conservation Status		
	(SANBI, 2008). The site is in an area classified as Critical Biodiversity Area		
	1 (CBA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in		
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019.		
	The site has dense indigenous vegetation, that has not been disturbed and		
	there is no access road to the proposed site. The potential environmental		
	impacts associated with borrow-pit activities will be severe.		
Socio-Economic	The are no activities taking place at the proposed site. There is residential		
	area situated within 700m of the proposed BP site. The site is within 800m		
	of the D192 road where the material will be transported for use, and this w		
	minimize the cost for transporting material to the working area.		
	The tribal authority has not given consent for the use of the proposed site as		
	such the Geotechnical investigation was not undertaken and the availability		
	of the required material is not known.		
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed		
	site.		
Overall motivation of not considering	Overall motivation of not considering the proposed site		
The proposed site was not selected a	s the preferred site considering that the following:		

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- The site has not been previously disturbed;
- The tribal authority has not given consent for the proposed site;
- The availability of the required gravel material is not known; and
- The Heritage status of the site is not known.

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 15A
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2.5 Borrow pit 7 Alternatives

2.5.1 Borrow pit 7 (Preferred site)

The proposed BP 7 situated on Farm Jakhalskuil, 754 LR within Jakkalskuil village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Critical Biodiversity Area	
	1 (CBA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in	
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019.	
	There have been previous Borrow-pit activities and illegal waste dumping	
	within the proposed site. The potential impacts associated with borrow-pit	
	will have impacts has been assessed and possible mitigation measures has	
	been provided in the EMPr. There site is situated along the existing gravel	
	road and no access road will required and this will minimize the removal of	
	vegetation.	
Socio-Economic	There is no activities on site, except for the observed illegal dumping	
	activities. Residential areas situated within 100m of the proposed BP site.	
	The site is within 800m of the D192 road where the material will be	
	transported for use, and this will minimize the cost for transporting material	
	to the working area.	
	RAL have appointed a Geotechnical Specialist to investigate the availability	
	of the required gravel material, and the findings of the reports indicate that	
	the site has enough of the required material.	
	The proposed site was selected with the assistance from the tribal authority	
	as the suitable site for the proposed Borrow-pit activity.	
Heritage	A Heritage Impact Specialist was appointed to assess the availability of	
	heritage and archeological features that may be impacted by the project. The	
	findings of the study indicated that there are no heritage or archeological	
	features within the identified site.	
Overall motivation of the preferred site		

ROADS AGENCY LIMPOPO TOGETHER FOR BETTER ROBES	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 15A
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The proposed site was selected as the preferred site considering that the following:

- Part of the proposed site have already been disturbed by previous Borrow-pit activities and illegal dumping;
- There is an existing access road;
- The location of the site is within reasonable distance from the community;
- The site was selected with the assistance of the traditional authority;
- RAL has already invested funds on the specialist studies already undertaken on the proposed site and
- There are no Heritage or Archeological features identified within the proposed site.

2.5.2 Borrow-pit 7 (Alternative site)

The proposed BP 7 situated on Farm Jakhalskuil, 754 LR within Jakkalskuil village.

ASPECT	IMPACT	
Biodiversity	The site falls within the Makhado sweet bushveld (Hardly Protected)	
	vegetation which is vulnerable in terms of Vegetation Conservation Status	
	(SANBI, 2008). The site is in an area classified as Critical Biodiversity Area	
	1 (CBA 1) in terms of the Waterberg Bioregional Plan (WBP) Gazetted in	
	Provincial Notice 1 of 2019, No 2966 of 04 January 2019.	
	The site has dense indigenous vegetation, that has not been disturbed and	
	there is no access road to the proposed site. The potential environmental	
	impacts associated with borrow-pit activities will be severe.	
Socio-Economic	The current land use is dense vegetation with residential areas situated	
	within 600m of the proposed BP site. The site is within 1km of the D192 road	
	where the material will be transported for use, and this will minimize the cost	
	for transporting material to the working area.	
	The tribal authority has no given consent for the use of the proposed site as	
	such the Geotechnical investigation was not undertaken and the availability	
	of the required material is not known.	
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed	
	site.	
Overall motivation of not considering the proposed site		

ROADS AGENCY LIMPOPO LIMPOPO LIMPOPO LIMPOPO	DOCUMENT TITLE:	Site Alternative motivation for the proposed Borrow-Pits establishment for the Preventative Maintenance of existing D192 Road.	Mamadi & Company 18A
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The proposed was not selected as the preferred site considering that the following:

- The site has not been previously disturbed.
- The tribal authority has not given consent for the proposed site;
- The availability of the required gravel material is not known; and
- The Heritage status of the site is not known.

3. CONCLUSIONS

Based on the findings of the alternative assessment, the preferred sites will have minimal environmental, socioeconomic and heritage impacts. And we request that the Department accept and assess the Basic Assessment report without the Ecological Impact Assessment report.