

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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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.



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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	<p>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.</p> <p>Although the area is within ESA 1, the specific site was selected considering that the vegetation is sparse as compared to the surrounding area.</p> <p>The potential impacts associated with the borrow-pit activities has been assessed and possible mitigation measures has been provided in the EMPr.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p> <p>The proposed site was selected with the assistance from the tribal authority as the suitable site for the proposed Borrow-pit activity.</p>
Heritage	<p>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</p>

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	within 100m of the site. The graves will be demarcated with a danger tape during construction.
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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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>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.</p>



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	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, 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.



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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	<p>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.</p> <p>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 EMP. The site already has an existing access road, this will minimize the removal of vegetation for the access road.</p>
Socio-Economic	<p>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.</p> <p>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.</p> <p>The proposed site was selected with the assistance from the tribal authority as the suitable site for the proposed Borrow-pit activity.</p>
Heritage	<p>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.</p>
Overall motivation of the preferred site	
The proposed was selected as the preferred 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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>The current land use is agricultural area with residential areas situated within 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.</p> <p>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.</p>
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed
Overall motivation of not considering the proposed site	
<p>The proposed alternative was not selected as the preferred site considering that the following:</p> <ul style="list-style-type: none"> • The site is utilised for agricultural purpose; 	

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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	<p>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 (WBP) Gazetted in Provincial Notice 1 of 2019, No 2966 of 04 January 2019. ESA 1.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p> <p>The proposed site was selected with the assistance from the tribal authority as the suitable site for the proposed Borrow-pit activity.</p>
Heritage	<p>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.</p>
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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p>
Heritage	<p>The Heritage Impact Assessment has not been undertaken for the proposed site.</p>
Overall motivation of not considering the proposed site	
The proposed was not selected as the preferred site considering that the following:	

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- 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.



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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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p> <p>The proposed site was selected with the assistance from the tribal authority as the suitable site for the proposed Borrow-pit activity.</p>
Heritage	<p>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.</p>
Overall motivation of the preferred site	
The proposed site was selected as the preferred site considering that the following:	



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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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>There 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 will minimize the cost for transporting material to the working area.</p> <p>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.</p>
Heritage	The Heritage Impact Assessment has not been undertaken for the proposed site.
Overall motivation of not considering the proposed site	
The proposed site was not selected as 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.



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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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p> <p>The proposed site was selected with the assistance from the tribal authority as the suitable site for the proposed Borrow-pit activity.</p>
Heritage	<p>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.</p>
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 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	<p>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.</p> <p>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.</p>
Socio-Economic	<p>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.</p> <p>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.</p>
Heritage	<p>The Heritage Impact Assessment has not been undertaken for the proposed site.</p>
Overall motivation of not considering the proposed site	

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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, socio-economic and heritage impacts. And we request that the Department accept and assess the Basic Assessment report without the Ecological Impact Assessment report.