

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Natasha Higgitt
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CaseID: 6021

Date: Friday March 16, 2018
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Ms Nangamso Zizo Siwendu
Environmental Impact Management Services (Pty) Ltd
PO Box 2083
Pinegowrie
2123
South Africa

Proposed Umsinde Emoyeni Wind Energy Facility and Associated Infrastructure Grid, in the Western and Northern Cape Provinces.

Arcus Consultancy Services was appointed by Emoyeni Wind Farm Project Proprietary Limited (EWFP) to conduct the relevant studies for Environmental Authorisation for the Umsinde Emoyeni Wind Energy Facility (WEF) and associated infrastructure near Murraysburg, Western Cape. A small section of the project area is located within the Northern Cape Province. It must be noted that SAHRA cannot comment on the section of the development within the Western Cape. Comments from Heritage Western Cape (HWC) must be sought for the areas of the proposed development located within the Western Cape Province. As such SAHRA will only comment on the Umsinde Emoyeni WEF Phase 2 Project and the Umsinde Emoyeni Grid Connection Phase 1 Project.

The proposed project will comprise two phases, which will include 98 wind turbines each and associated grid connections. According to the maps provided, the Umsinde Emoyeni WEF Phase 2 Project has approximately 10 turbines located within the Northern Cape Province. A section of the Phase 1 Umsinde Emoyeni Grid Connection traverses the Northern Cape Province. Arcus appointed ACO Associates to conduct the Heritage Impact Assessment.

Hart and Almond, 2015. Heritage Impact Assessment for the Proposed Umsinde Emoyeni Wind Energy Facility.

According to maps provided, a total of seven heritage resources were identified within the Northern Cape section of the Umsinde Emoyeni WEF Phase 2 Project. These included L019, N041-044 and N057-058. These heritage resources include an engraved boulder, stone walled structures and a site with both Later Stone Age and Historical remains. These sites were either ungraded or given a 3B or 3C rating of significance.



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It is unclear whether these heritage resources are to be impacted by the proposed turbine positions or access roads as no map providing the location of the identified heritage sites in relation to the proposed development was supplied. Additionally, photographs and detailed descriptions of all the identified heritage resources was lacking in the report. It is noted that no GPS co-ordinates were provided citing the need to protect the heritage resources from illegal collections of artefacts; however an indication of how far each heritage site is located from a proposed development activity is required.

Highly significant palaeontological resources were identified within the larger Umsinde Emoyeni WEF Project area; however the location of these resources is unclear as no map providing the location of the identified palaeontological sites in relation to the proposed development was supplied. It is noted that this was intentionally omitted citing the need to conserve the fossils, however an indication of how far each fossil site is located from a proposed development activity is required. As such, it is unclear whether any palaeontological resources were identified within the Northern Cape and if such palaeontological resources will be impacted by the proposed development.

Recommendations in the submitted report include the following (as they pertain to the Northern Cape):

- Powerlines to avoid visually sensitive peaks, major ridgelines, scarp edges and slopes steeper than 1:5 gradient;
- Access roads to be in sympathy with the contours, avoid steep 1:5 slopes and drainage courses, and kept as narrow as possible;
- Mountain peaks and ridges as identified in the Visual Impact Assessment (VIA) must be avoided;
- Once the final layout of the WEF and associated transmission line is determined, a pre-construction palaeontological study must be undertaken over areas underlain by the Lower Beaufort Group bedrocks. The study must be conducted by a qualified palaeontologist;
- The employment of a palaeontologist during the construction phase, establishment of on-site curation facilities and identification of a repository for specimens;
- A Fossil Chance Finds Procedure must be implemented during the construction phase of the project. The Environmental Control Officer (ECO) must safeguard exposed fossils and alert the relevant Heritage Resources Authority;
- Conduct a final walk down of roads and check turbine positions for archaeological material. Should archaeological material be identified, they will be subject to sampling and removal from site (a permit must be applied from either HWC or SAHRA depending on where the heritage resources are located);
- Dolerite cluster and flat dolerite rafts must be checked for rock engravings. The location of these sites must be noted, sites photographed and recorded and moved out of harm's way, or the road should be re-aligned to avoid them;



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- All of the above recommended mitigation measures must be included and implemented as part of the EMPr for the project.

In an Interim Comment issued on the 25/02/2016, SAHRA noted the several preliminary conditions to be included in the Final EIA and EMPr.

Since the comment was issued, the layout of the proposed development has been revised. A revised EIA report for the Umsinde Emoyeni WEF Phase 1 and Phase 2, as well as the Umsinde Emoyeni Grid Connection Phase 1 and Phase 2 have been submitted, along with a Heritage Addendum.

Hart, T. 2018. Project addendum: UmSinde Emoyeni Wind Farm Project, Heritage Component of EIA process.

*SAHRA will only comment on the Umsinde Emoyeni WEF Phase 2 Project and the Umsinde Emoyeni Grid Connection Phase 1 Project as these developments are located in the Northern Cape. *

The amended layout has not affected the overall recommendations of the previous heritage specialist reports. The visual impacts to the historical farmsteads have been reduced and the revised layout has avoided impacts to heritage resources. The previous reports recommendations are supported.

Final Comment

The SAHRA Archaeology, Palaeontological and Meteorites (APM) Unit has no objection to the proposed development and supports the recommendations of the heritage specialists. The recommendations of the specialists and the following conditions must be included in the EMPr:

- It must be emphasized that SAHRA can only comment on the section of the development located within the Northern Cape (Phase 1 Grid Connection and Phase 2 WEF). Comments from HWC must be sought regarding the areas of the proposed development located within the Western Cape Province;
- A Walk-Down of the final positions of the turbines and access road routes must be completed prior to construction by a qualified archaeologist and a qualified palaeontologist. The locations of construction camps and laydown yards must also be assessed as part of the walk-down report. The report must CLEARLY state which heritage resources are located within the Northern Cape and Western Cape Provinces to allow the relevant Heritage Resource Authority (HRA) to provide comments. The report must also clearly state the distance between each proposed project activity and identified resources via detailed descriptions, photographs and a map;
- A bufferzone of 50 m must be maintained from all identified heritage resources. A Conservation



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Management Plan (CMP) must be developed for all heritage resources that are to be retained *in-situ*. The CMP must include and is not limited to details regarding on-going monitoring and access controls for affected interested and affected parties i.e. family member related to the graveyards. This CMP must be submitted to SAHRA for comment;

- Turbine placements must avoid areas underlain by the Lower Beaufort Group rocks. Should this not be possible, a Watching Brief must be conducted during the construction phase of the project. This must include the on-site presence of a qualified palaeontologist who will monitor excavations for turbine foundations, access roads and underground cables within the Lower Beaufort Group rocks. A Watching Brief Report detailing the results of the monitoring must be submitted to SAHRA for comment;
- Chance Finds and Fossil Finds Procedures must be developed and implemented for the project. These procedures must include standard protocol, steps and reporting structures to be followed should any heritage and/or fossil heritage is uncovered during all phases of development;
- 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 (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. 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. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- Should comments from HWC require the re-alignment of the Phase 1 Transmission line and the route through the Northern Cape be amended, the revised Heritage report assessing the new route must also be submitted to SAHRA for comment;
- The applicant is responsible for ensuring that comments from HWC are received regarding the areas of the proposed development located in the Western Cape Province;
- As the Final EIA/EMPr has been completed, and SAHRAs comments not incorporated as part of the submission to the Competent Authority for decision making, this comment must be forwarded directly to the Competent Authority for their consideration as per section 38(8) of the NHRA. Proof of this submission must be provided to SAHRA; and
- Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

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Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/169786>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.