

DATE: 2013-06-02

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LETTER OF RECOMMENDATION:

RESPONSE TO THE SAHRA FINAL COMMENT (2013-04-30) – CMP: SITE 2.3, RED CAP CENTRAL CLUSTER WIND FARM, EC [SAHRIS CASE ID: 188]

In accordance with consultation regarding the SAHRA Final Comment relating the CMP for Site 2.3, Red Cap Wind Energy Facility, Kouga Municipality, Eastern Cape, SAHRIS Case ID: 188, ArchaeoMaps has been advised to refrain from acceptance thereof, or further comment on, or revision of the particulars of the submitted CMP of Site 2.3, up and until such time as proof can be submitted by SAHRA that these requirements are in accordance with basic environmental legislation, related requirements and principles. The following has been pointed out and would need further clarity:

1. Rezoning requirements apply, as understood the area under question exceeds requirements for rezoning from agricultural to conservation. In the case of Site 2.3 it is understood that SAHRA would need to be the applicant for the rezoning application;
2. As a norm rezoning applications do not trigger BA or EIA requirements. However, it has been advised to request at minimum an economic and agricultural assessment with regards to the impact of the proposed conservation requirements (rezoning application area, including 200/100m conservation buffer zone) on the direct economic sustainability of the property. In addition concerns raised by the Department of Agriculture during the PPP of the EIA for the Red Cap Central Cluster Wind Farm needs to be observed – concerns believed to have been instrumental in the rezoning of only development footprints for purposes of the Wind Farm development and not of the total properties in question. The above assessments thus requested with reference to the general principles of Integrated Environmental Management (IEM) inherent in environmental management and focussing on assessment of the natural environment, the cultural environment and the socio-economic relationship(s) relevant to the applicable study site / development in question;
3. Further clarity is requested with regards to the date of the SAHRA Final Comment for the CMP of Site 2.3 (2013-04-30) with respect to the date of submission of the CMP (2010-12-31) – this specifically with reference to EIA commenting timeframes for purposes of EA with the aim thereof being responsible / sustainable development. This said with cognisance to the SAHRA revised ARC Comment (2011-02-22) which stated that: *'The Conservation Management Plan itself will be commented (on) by SAHRA apart from this Review Comment'*.

Archaeological matters on which clarity would be appreciated include:

4. The SAHRA revised ARC Comment (2011-02-22) states erroneously that *'the author* (Karen van Ryneveld) *and the developer agreed on site preservation.'* It needs to be noted that the option of

mitigation of Site 2.3 was included in the Phase 1 AIA (dated 2010-09-20). It was disapproved by the Gibb appointed external reviewer (Dave Halkett) and assumed based also on environmental concerns. In addition a meeting was held between SAHRA, Red Cap, Gibb and the offices of the external reviewer on 2010-12-15 – a meeting that ArchaeoMaps was not aware of. Despite requests for the agenda of this meeting, this has to date not been received. ArchaeoMaps was informed of the decision of conservation rather than mitigation. In the case of the CHIA (dated 2010-12-31) ArchaeoMaps reported on environmental and heritage decisions made, and was not as stated part of the discussion or agreement thereof. With reference to the original proposal for mitigation included in the Phase 1 AIA report, if SAHRA can provide clarity on why mitigation is only now considered as heritage management option (your e-mail dated 2013-05-02 which states *'otherwise mitigation might be a better option'*);

5. Regarding the SAHRA Site Significance Rating of Site 2.3: In Both the Phase 1 AIA and the CHIA Site 2.3 was ascribed a SAHRA High Significance and a Generally Protected A Field Rating. The SAHRA guidelines (2007, pp8) stating that: *"General' Protection A (Field Rating IV A): This site should be mitigated before destruction (usually High / Medium Significance'* (being the 3rd lowest rating of the described 7-tier significance rating scheme). Within the significance rating scheme there are 5 levels of High Significance. Why are High Significance ratings not considered in context with the applicable field ratings?;
6. The Phase 1 AIA and CHIA was done for purposes of EIA's for the proposed Red Cap Wind Farm developments. With regards to the Central Cluster development the developer Red Cap has observed and complied with SAHRA requirements for development including as per the SAHRA revised ARC Comment (2012-02-22):
 - ↳ *The final development design of the Central Cluster be revised... SAHRA requires that:*
 - *Either the position of Turbines 33, 36 is shifted north away from the dunes; or*
 - *A Phase 2 AIA is undertaken in the form of test excavations to better understand the sensitivity of line 33-36 located between the dune system and Site 2.3; test excavation must be undertaken before any other earth moving activity... The archaeologist will require a shovel test (test excavation) permit from SAHRA... Upon receipt of a satisfactory mitigation (Phase 2) permit report from the archaeologist, SAHRA will make further recommendations.*
 - *A 200m buffer zone is maintained around Site 2.3. No activity may be carried out within this zone except for the continued use of the existing access road at the west of the site.'*

Red Cap opted for the Phase 2 AIA test pitting coincided with a revised development layout. Consultation with geologist Richard Fyvie was reported on in the permit application (van Ryneveld 2012-02-10): Site 2.3 was interpreted as forming part of a large paleo-drainage system before the formation of the Holocene dune landscape to the south. This interpretation highlights the essential ex-situ context of the artefacts – their provenance thus primarily the result of post depositional water (drainage and flood) activities. Anthropogenic sterility at some open geo-technical test-pits, inspected during initial micro-siting survey supports this interpretation, as reported on already in the permit application. Subsequently the test pitting permit was issued (SAHRA Permit No 80/12/02/027/51 – dated 2012-04-01), test pitting done and reported on in a micro-siting and Turbine Line 33-36 test pitting report (2012-05-31). The archaeological Phase 2 test pitting program included 10 test pits and it was reported on that *'No archaeological sites, lenses, occurrences or artefacts were identified in any of the test pit sections'*, further describing the general anthropogenic sterility in the area between Site 2.3 and the coastal dune fields to the south. Subsequent consultation and permitted fieldwork thus resulted rather than raised SAHRA Site Significance Rating in a decrease of significance – artefacts are confirmed ex-situ, with its provenance in a palaeo-drainage system, also explaining the originally inferred limitation to stratigraphic sequencing. The micro-siting and Turbine Line 33-36 report was accepted by SAHRA (2012-07-10).

Please also note that the site description of Site 2.3 needs further consideration in light of additional consultation and test pitting, specifically with reference to the SAHRA description of Stone Age sites vs scatters (SAHRA Stone Age questionnaire dated 2013-05-15) where a 'scatter' is defined as '*Ex-situ material (e.g. transported, deflated or exposed by natural agents) as identified on the landscape and with no stratigraphy*', effectively re-describing Site 2.3 as a Stone Age scatter by SAHRA definition.

Second thereto – Turbine 36 is situated approximately 400m from Site 2.3. Red Cap has thus observed the 200m conservation barrier with reference to development impact (Red Cap Wind Farm) and Red Cap will only be making use of the access road to the west of Site 2.3.

I trust that the above explains why no further comment from the side of ArchaeoMaps regarding the CMP for Site 2.3 can be made at this time and upon receipt of the requested information ArchaeoMaps will further investigate SAHRA requirements for site conservation.

Yours faithfully,



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