

NO.	DATE	AFFILIATION	REFERENCE NUMBER	COMMENTS	RESPONSE	RESPONDENT
Comments Pre-App BAR October 2018						
1.	11-10-2019	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/11/1222/18	<p>Appendix F1.3 Acknowledgement of receipt of the Pre-App BAR</p> <ol style="list-style-type: none"> 1. The pre-App BAR and letter dated 5 Oct 2018, as received by this department of the same day, refer. 2. This letters serves as an acknowledgement of receipt of the aforementioned document by this department. 3. Please note that this Department will consider the pre-app draft BAR and issue comment with the prescribed 30 day commenting period which ends on 7 Nov 2018 . 4. Kindly quote the above mentioned reference number in any future correspondence in respect of the application. 5. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department 6. This Department reserves the right to revise or withdraw any 	<ol style="list-style-type: none"> 1. Noted 2. Noted. 3. Noted 4. Noted 5. Noted 6. Noted 	EnviroAfrica

				comments or requested further information from you based on any information received.		
2.	02-11-2019	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/11/1222/18	<p>Appendix F1.4 Comment on the Pre-Application Draft BAR report.</p> <ol style="list-style-type: none"> 1. The pre-application Draft BAR and letter dated 5 October 2018 and this Department's acknowledgment thereof issued on 11 October 2018, refer. 2. This letter serves as comment on the aforementioned document by this Department. 3. According to the information submitted to this Department, the following is noted: <ul style="list-style-type: none"> • The proposal entails the development of a 30m high lattice mast on Portion 7 of Farm Jagervlakte No. 292, Grabouw. • The Klipdrift river flows along the north-eastern boundary of the site but the development will be located more than 32m thereof. • According to the NEFPA Map, the site falls within a channelled 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. <ul style="list-style-type: none"> • Correct • Correct • Correct. A freshwater specialist conducted a 	EnviroAfrica

				<p>valley bottom wetland, but based in the information, the area has been transformed by agricultural activities.</p> <ul style="list-style-type: none"> This site is zoned for agriculture use, is vacant and undeveloped and is located out the urban area of Grabouw. <p>4. The Department's comments are as follows:</p> <p>4.1 It is indicated a Freshwater and Botanical Specialist were not appointed since the site does not contain indigenous vegetation and the wetland has been completely transformed. These findings must be confirmed by Cape Nature.</p> <p>4.2 However, if the site is deemed to fall within a wetland, Activity 12 of Listing Notice 1 will be triggered by the proposed development. If applicable, this activity must be considered, assessed and addressed.</p>	<p>Wetland delineation & Freshwater report (Appendix G2).</p> <ul style="list-style-type: none"> Correct. <p>4.</p> <p>4.1 Please note that a Freshwater specialist was appointed to conduct a Wetland Delineation, Freshwater report (Appendix G2) and General Authorisation (Appendix E2). Findings discussed in the BAR.</p> <p>4.2 From the wetland delineation in the freshwater specialist report (Appendix G2), it can be concluded that the proposed location of the mast does not fall within the wetland, but does fall within the 500m radius of the wetland. This activity has</p>	
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				<p>4.3 In was noted that the information in the Heritage Screener dated 5 June 2018 refers to the proposed development of a 25m high mast, this must be rectified in the BAR.</p> <p>4.4 Pages 45 and 54 of the BAR refers to the proposed development of a 25m high mast in Klipheuwel, page 62 refers to a 25m mast in Worcester and page 72 refers to the proposed development of a 25m high tree mast. This must be corrected in the BAR.</p> <p>4.5 Since the site is zoned for agriculture use, comment for the Department of Agriculture must be included in the BAR.</p>	<p>been included, assessed and addressed in the BAR.</p> <p>4.3 Noted and corrected.</p> <p>4.4 Thank you for pointing out these discrepancies. These have been corrected in the BAR and EMPr</p> <p>4.5 The Pre-App BAR for comment (Oct 2018) was sent to Department of Agriculture for comment, no comments were received. Please refer to Appendix F7 for proof that the report was sent to I&APs for comment. The Dept of Agriculture will</p>	
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				<p>4.6 Comment form the DWS is required with regards to the potential water uses in terms of the NWA (Act 36 of 1998), if any. Pleas be advised that in terms of the Standard Operating Procedure between this Department and the DWS, which came into effect on 1 July 2017, the EAP must submit a written water use application request to the DWS to determine whether or not a GA or WUL in terms of the NWA is required. In terms of the Agreement for the One Environmental System (section 50A of the NEMA and section 41(5) and 163A of the NWA) the processes for a WUL and an EIA must be aligned and intergrated with respect to the fixed and synchronised timeframes, as prescribed in</p>	<p>have another chance to comment on the Post-Application BAR. Please see Appendix F1.4.1</p> <p>4.6 Based on comments from BGCMA and Cape Nature (Appendix F1.6 & 1.7) a freshwater specialist was appointed to conduct a Wetland delineation and Freshwater report with Risk Matrix (Appendix G2) considering two alternatives. The freshwater specialist liaised with BGCMA who requested a General Authorisation. BGCMA. The GA Appendix E3) was granted for Alternative A. Findings discussed in the BAR.</p>	
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				<p>the EIA regs, 2014, as well as the 2017 WULA Regs.</p> <p>4.7 It is indicated that the power line will be from Eskom. Please provide written confirmation that they have sufficient capacity to accommodate the proposed development.</p> <p>4.8 The public participation process must comply with the requirements of Regulation 41 of the EIA Regs 2014 and proof of compliance with all the steps undertaken must be included in the BAR.</p> <p>4.9 Omission of any required information in terms of Appendices 1 and 4 of the EIA Regs 2014 with regards to the final submission of the FBAR and EMPr, respectively to the Department, may result in the application for EA be refused.</p> <p>4.10 Be advised that an original signed and dated applicant declaration is required to be submitted with the FBAR to this Department for decision-making. It is important to note that by signing this declaration, the</p>	<p>4.7 Letter requested.</p> <p>4.8 Please refer to Appendix F of the BAR for the Public Participation process conducted.</p> <p>4.9 Noted and agreed</p> <p>4.10 Noted and agreed. Original signature to be included in the FBAR.</p>	
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				<p>applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making, Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>4.11 In addition to the above, please ensure that the original signed and dated EAP declaration is also submitted with the FBAR for decision making.</p> <p>5. Kindly quote the above mentioned reference number in any future correspondence in respect of the application.</p> <p>6. Please note that it is an offence in terms of Section 49A (1) (a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for undertaking</p>	<p>4.11 Noted and included.</p> <p>5. Noted.</p> <p>6. Noted.</p>	
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				<p>it. Failure to comply with the requirements of Section 24F of the NEMA shall result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>7. This Department reserves the right to revise od withdraw any comments or request further information from you based on any information received.</p>	7. Noted.	
3.	06-11-2018	Overberg District Municipality Francois Kotze	18/5/5/4	<p>Appendix F1.5 The ODM's department of Environmental Management Services values the opportunity to give input on the Pre-App BAR</p> <p>1. It is noted that the proposed development is situated in agricultural land and therefore has no impact on any critically endangered species that may occur within the Kogelberg Sandstone Fynbos ecosystem.</p>	1. Noted and agreed.	EnviroAfrica

				<p>2. It is acknowledged that the development is not within the 32m buffer area of the Klipdrifriver but that the development is situated within a valley-bottom wetland which is mapped as a Freshwater Priority Area.</p> <p>3. The use of a lattice mast instead of a monopole or tree mast could have a more negative visual impact on the immediate surrounding.</p> <p>4. It is acknowledged that the proposed development for improved network coverage will have a positive social impact.</p>	<p>2. Agreed. A freshwater specialist was appointed to conduct a Wetland delineation and consider alternatives. Findings discussed in the report.</p> <p>3. Noted. A Visual Impact Assessment was conducted (Appendix G3). The specialist agreed that a lattice mast is the preferred alternative for reasons discussed in the BAR.</p> <p>4. Noted.</p>	
4.	07-11-2019	Cape Nature Chanel Rampertab	SSD14/2/5/1/7/4/292-7_mast_Grabouw2	<p>Appendix F1.6</p> <p>CapeNature would like to thank you for the opportunity to comment on the application for the erection of a 30 m telecommunications mast on FA 292/7,</p>		

				<p>Jagersvlakte, Grabouw. CapeNature commented previously (ref: SSD14/2/5/1/7/4/292-7_mast_Grabouw) on the biodiversity value of the site. Please note that our comments only pertain to the biodiversity-related impacts and not to the overall desirability of the application.</p> <ol style="list-style-type: none"> 1. According to the report, the site is 'completely disturbed with no natural areas remaining'. Historical satellite imagery shows that the site had been transformed; however, no active disturbance of soil (e.g. ploughing) appears to have taken place within the last decade. Note that the ESA2 status of the site accounts for this level of transformation (Western Cape Biodiversity Spatial Plan, CapeNature 2017). Although the development footprint is small (100 m²), it is important to note the following principle: transformed wetlands are still functional in terms of ecological processes; ecological infrastructure; and risk mitigation. Any further 	<ol style="list-style-type: none"> 1. Please note that based on these comments from Cape Nature as well as comments from BGCMA (Appendix F1.7) a freshwater specialist was appointed to evaluate site alternatives and conduct a Freshwater impact report, which included a wetland delineation and Risk Matrix (as requested by BGCMA), The specialist liaised with BGCMA, who requested a General Authorisation. BGCMA granted a GA (Appendix E3) for Alternative A. Findings discussed in the BAR. 	
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				<p>hardening compromises the ecosystem and compounds negative downstream effects, e.g. decreased capacity to mitigate floods and transport run-off; increased soil erosion; and increased introduction of non-point source pollution.</p> <p>2. No alternative locations were presented; however, the southern section of the property just 60 m southeast of the proposed location will likely have a lower impact on the receiving environment because it falls outside both the mapped wetland and the ESA2.</p>	<p>2. Please note that this location (60m southeast of the proposed location, Alternative B) was evaluated by the Freshwater specialist and findings are included in the BAR. The freshwater specialist concludes that both site alternatives are located out of the wetland area but within the 500m buffer zone. The freshwater specialist further states that the original location (Alternative A) is more preferred, even though alternative B is out of the official NFEPA. The original location is slightly further away from the verge of the demarcated wetland and further away from a spring. BGCMA granted a GA for the</p>	
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				<p>3. CapeNature requests that an alternative location is considered; however, if the application is authorised as it stands, the development must take place in the dry summer months.</p> <p>4. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>original location (Alternative A). Findings discussed in the BAR.</p> <p>3. Please refer to the explanation above. This condition will be included in the BAR.</p> <p>4. Noted and agreed.</p>	
5.	07-11-2019	BGCMA V Ligudu	4/10/1/G40C/Farm Jagersvlakte 292/7 Grabouw	<p>Appendix F1.7 This office reviewed the report and has the following comments:</p> <p>1. All relevant sections and regulations of the NWA (Act 36 of 1998) regarding water use must be adhered to.</p> <p>2. Any activity within the 1:100 year floodline or within 100 metres of a watercourse (river, spring, natural channel, lake or dam) or within a 500m radius</p>	<p>1. Noted and agreed.</p> <p>2. Noted.</p>	

				<p>from the delineated boundary (extent) of any wetland or pan triggers a water use activity in terms of Section 21 c & i of the NWA (Act 36 of 1998).</p> <p>3. You are requested to submit the Risk Matrix for the wetland mentioned in the Report.</p> <p>4. Erosion control measures must be implemented to prevent soil erosion during construction.</p> <p>5. No pollution of surface water or ground water resources may occur due to any activity.</p> <p>6. Please note that engaging in activity that triggers the NWA without authorisation is an offence and will result in the BGCMA taking legal action against the proponent in terms of the NWA (Act 36 of 1998)</p>	<p>3. Noted please refer to the Freshwater report (Appendix G2).</p> <p>4. Conditions were included in the BAR and EMPr.</p> <p>5. Conditions were included in the BAR and EMPr.</p> <p>6. Noted and agreed. A GA was granted by BGCMA (Please refer to Appendix E3).</p>	
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Comments on Initial Public Participation an NOI

1	2018-07-23	Bernadette Osborne The Board of Directors Atlas Towers	16/3/3/6/7/1/E4/11/1222/18	<p>Appendix F1.1</p> <ol style="list-style-type: none"> 1. Notice of intent to submit an application in terms of the National Environmental Management Act. 1998 (Act No. 107 of 1998) and the 2014 Environmental Impact Assessment Regulations for the proposed development of a 30m high telecommunication lattice mast, remainder of farm Jagtersvlakte No. 292, Grabouw. 2. Your document and letter dated 12 July 2017, as received by the Department on the same day, refer. 3. This letter serves as acknowledgement of receipt of the aforementioned document. 4. The Department notes your request for a pre-application meeting. The meeting date will be confirmed with the Environmental Assessment Practitioner, Mr Inge Erasmus of Enviro Africa cc. 5. The Department will provide a comment subsequent to the meeting. 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted and thank you 4. As per our telephonic conversation, a pre-app meeting is no longer required. 5. Could the Department please provide comments on this Pre-Applications BAR. Comments will be addressed 	
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				<p>6. The Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.</p>	<p>in the next round of public participation. 6. Noted.</p>	
1.	2018-07-28	Chanel Rampartab CapeNature	SSD14/2/5/1/7/4/292-7 DEADP- NOI Cape Nature HWC	<p>Appendix F1.2</p> <p>1. CapeNature would like to thank you for the opportunity to comment on the application for a 30 m high telecommunications mast on FA 292/7, Jagtersvlakte, Grabouw. These comments only pertain to biodiversity-related impacts and not to the overall desirability.</p>	<p>1. Noted</p>	

				<p>2. According to the Western Cape Biodiversity Spatial Plan (WCBSPP 2017), the farm is dominated by an Ecological Support Area with restoration potential (ESA2), with a small section of Critical Biodiversity Area in good condition (CBA1) at the northern corner. A non-perennial segment of the Klipdrif River runs along the farm's eastern boundary. A channelled valley-bottom wetlands spreads throughout the farm and has been classified as a National Freshwater Ecosystem Priority Area (NFEPA). The vegetation has been mapped as Kogelberg Sandstone Fynbos, which is critically endangered due to threatened plant species associations (criterion D1).</p> <p>3. Depending on the detailed layout plan that will be provided in the upcoming public participation, the following National Environmental Management Act (NEMA) listed activities may be triggered, in addition to Listing Notice 3, Activity 3:</p>	<p>2. From Cape farm mapper the site does not fall within a CBA (Please see sensitivity maps Appendix D). The site does fall within an ESA and is more than 32m away from the non-perennial Klipdrif River. It is noted that the site falls within a valley bottom wetland. However, from site visits and google imaged it is clear that the entire area is completely transformed due to past and current agricultural activities with no natural vegetation associated with the wetland present.</p> <p>3.</p>	
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				<p>a. Listing Notice 3, Activity 12 (i): The clearance of 300m² or more of indigenous vegetation within any critically endangered or endangered ecosystem listed in section 52 of the National Environmental Management: Biodiversity Act (NEM:BA).</p> <p>b. Listing Notice 1, Activity 12: The development of infrastructure or structures with a physical footprint of 100m² or more within 32 m of a watercourse or in front of a development setback.</p> <p>c. Listing Notice 1, Activity 19: The infilling or depositing of any material of more than 10m³ into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10m³ from a watercourse.</p>	<p>a. The proposed development will not require the clearance of more than 300m² (only 100m²) and although the vegetation type that would have been present on the site is considered as critically endangered, no natural vegetation is present anymore.</p> <p>b. Noted and included even though the wetland is considered transformed.</p> <p>c. Not included as the proposed development will not require the infilling, depositing or removal of 10m³ of material.</p>	
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				<p>4. CapeNature would like to receive the full reports related to this application for comment. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>4. Noted. This Pre-App BAR will be made available.</p>
3.	2018-08-13	Andrew September Heritage Western Cape	18072426AS0726E	<p>Appendix E1</p> <p>1. Heritage Western Cape is in receipt of your application for the above matter received on 31 July 2018 and was discussed at our Heritage Officials Meeting (HOMS) on 06 August 2018.</p> <p>2. You are hereby notified that, since there is no reason to believe that the proposed 30m telecommunications mast will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.</p> <p>3. However, should any heritage resources, including evidence of caves and human burials, archaeological material and</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted and condition to be added in the EMPr</p>

				paleontological material be discovered during the execution of the activities above, all works must be stopped immediately and HWC must be notified without delay.		