

Comments-Responses Table

I&AP	Comment received	Response to	Respondent
<p>CapeNature (03/08/2022)</p>	<p>Good day Herewith CapeNature's comment on this application.</p> <ol style="list-style-type: none"> <li data-bbox="443 465 746 1106">1. It is understood the dam will be used to store ELU water and is an off-channel dam. It is clear from the site verification survey and botanical compliance statement that the proposed dam development area has been transformed by agricultural activity. The development site is also unselected as per the WCBSP, but lies adjacent to the mapped NFEPA Olifant's River. <li data-bbox="443 1137 746 1442">2. There are no botanical or faunal to the development. The botanical compliance statement is accepted and all recommendations must be implemented. <li data-bbox="443 1473 746 1532">3. Regarding the aquatic assessment: <ol style="list-style-type: none"> <li data-bbox="443 1599 746 1904">3.1 The assessment proposes erosion control and stormwater management especially regarding the dam wall. What are the methods to be used to achieve such mitigation? 	<ol style="list-style-type: none"> <li data-bbox="778 501 895 530">1. Noted <li data-bbox="778 1173 895 1202">2. Noted. <li data-bbox="778 1599 1145 1995">3.1 It has now become clear that the toe of the new wave dam wall must be paved, as the wall touches upon the 1 in 100 year floodline. Paving can be of concrete, but rock and cement will suffice. This was taken up with Bester Engineers of Ceres and they will add this to the primary design of the dam wall. 	<ol style="list-style-type: none"> <li data-bbox="1225 501 1422 530">1. EnviroAfrica <li data-bbox="1225 1173 1422 1202">2. EnviroAfrica <li data-bbox="1177 1599 1437 1688">3.1 Dr Dirk von Driel (appointed freshwater specialist)

	<p>3.2 The assessment recommends revegetation of the dam wall that must be implemented during the dry season and complete by the next wet season. It is doubtful whether this is possible. Furthermore and more importantly, vegetation of the dam wall will not runoff erosion which would pose a risk of sedimentation into the Olifant's river. A better method of erosion control that poses low risk of sedimentation of the Olifant's river needs to be presented.</p>	<p>3.2 The rehabilitation / vegetation of the earthen dam wall must be overseen by a specialist in this field, of which there are several in our area. This is quite possible, especially with the help of suitable irrigation. I have referred the engineers to the books of Ken Coetzee (Caring for Natural Rangelands, 2005), where there are a number of ways to deal with exposed and disturbed places, of which an appropriate one or a combination can be selected. But then a rehabilitation specialist will know what to do. Please note that this is a low rainfall area, tantamount to semi-desert conditions and that major erosion is unlikely. There are many exposed walls and declines where vineyards have been levelled against the slopes around Trawal and along the river and these walls do not show signs of much erosion.</p>	<p>3.2 Dr. Dirk von Driel (appointed freshwater specialist)</p>
	<p>3.3 The cumulative impact of the dam has not been assessed and must be assessed in the context of available data on illegal dams/water use, and indirect downstream effects resulting from abstraction. It is understood that the assessment has indicated that abstraction impact was not assessed due to the dam being for ELU. However, the current ecological water reserve as per DWS recent reserve study needs to</p>	<p>3.3 The proponent does not have the authority to implement this advice. The proponent can only make the means to abstract the amount of water that the proponent is lawfully allowed to abstract. It is only the National Department of Water and Sanitation that has the authority to investigate how much existing usage of water is lawful and how much is unlawful and decide whether over-allocation of ELUs exists or not and what necessary action to</p>	<p>3.3 EnviroAfrica</p>

	<p>be considered as current ELUs might be over-allocated and need to be reduced, which would impact the required dam size, or whether this development is feasible.</p>	<p>take in response to the findings.</p>	
<p>DEA&DP (04/08/2022)</p>	<p>2.1.1 Pre-application SR states that the existing cultivation fields on the farm will be expanded by approximately 5ha to approximately 8ha in extent. It is, however, this Department's understanding that the current pre-application process only pertains to the construction of the new dam and associated infrastructure.</p> <p>2.2 It is mentioned in the Pre-Application SR that the water to be stored in the proposed dam will augment the irrigation water supplied by the two water storage dams that currently exist on the farm. As such, please ensure that in terms of the need and desirability context, detailed information is provided, as to why the existing dams are insufficient in terms of storage capacity <i>etc.</i></p> <p>2.3.1. Albeit that proof of the Water Use Licence Application ("WULA") submitted to the National Department of Water and Sanitation ("DWS") was provided as part of the pre-application SR&PoS, due to the nature of your proposed development comment/input from DWS regarding proposed development must be obtained as soon of the pre-application and formal EIA application processes.</p> <p>2.4 It is this Department's understanding that no water use rights will be enhanced/upgraded as result of the proposed dam.</p>	<p>2.1.1 The proposed development only entails the establishment of a dam. It is only when the proposed dam is in existence at some point in the future that expanding farming operations by 5ha to 8ha will become a possibility that can be looked into.</p> <p>2.2 Done</p> <p>2.3.1 Noted</p> <p>Proof of existing water allocation attached to Draft Scoping Report as Appendix 2K</p>	<p>EnviroAfrica</p> <p>EnviroAfrica</p> <p>EnviroAfrica</p> <p>EnviroAfrica</p>

	<p>However, please be reminded to provide proof of the water allocation of 477 020m³ granted by the Lower Olifants River Water Users Association for the said property.</p> <p>2.5.2. You are therefore reminded to ensure that the formal letter from Heritage Western Cape, which displays such comment is included with your submission of the final EIA report to this Department for decision-making.</p> <p>2.6.2. Notwithstanding the above, you are reminded that should any additional electricity supply be required in order to pump the water to where it is required, then confirmation of electricity from the relevant service provider must be included with your submission of the final EIA report to this Department for decision-making.</p> <p>2.8.2. Geotechnical Related Impacts</p> <p>Please ensure that the EIA phase of the formal EIA process assesses the geotechnical related impacts of the proposed development, as well as the mitigation measures that will be required in this regard and that a report detailing such is submitted with the draft and final EIA Reports to this Department.</p> <p>Please ensure that the SR is amended to fulfil all requirements of Appendix 2 of the EIA Regulations, 2014 (as amended), with specific reference to the following requirements that has not been met in the pre-application SR:</p>	<p>The letter of comment from Heritage Western Cape is attached hereto as Appendix 1D</p> <p>2.6.2 The proposed development will not cause the farm to require any additional services nor additional electricity.</p> <p>2.82 The geotechnical report is attached hereto as Appendix 2M</p>	<p>EnviroAfrica</p> <p>2.62 EnviroAfrica</p> <p>2.82 EnviroAfrica</p>
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	<p>2.9.2 Section 2 (1)(b)(i): the location of the activity, including the 21-digit Surveyor General code of each cadastral land parcel;</p>	<p>2.9.2 The two parcels of land on which the proposed site is located have been specified throughout the pre-application Scoping Report. The SG 21 digit codes for the two parcels of land are specified in Section 5.5 of Appendix 2H of the pre-application Scoping Report.</p>	<p>2.9.2 EnviroAfrica</p>
	<p>2.9.3. Section 2 (1)(g)(v): the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts—</p> <p>(aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated.</p>	<p>2.9.3 Please refer to Section 8 of the Draft Scoping Report and Appendix 2H</p>	<p>2.9.3 EnviroAfrica</p>
	<p>2.9.4 to 2.9.7 Section 2 (1)(g)(vii): positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected, focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p>	<p>2.9.4 Please refer to Section 8 of the Draft Scoping Report and Appendix 2H</p>	<p>29.4 EnviroAfrica</p>
	<p>2.10</p>	<p>2.10 Please see revised Plan of Study in Section 9 of the Draft BAR</p>	<p>2.10 EnviroAfrica</p>

	2.11	<p>2.11 <i>“Hello Maboe I understand your problem with the DEA&DP because my reports are primarily directed at the Department of Water and Sanitation for the Water Use licence Application and not for the EIA. So you will have to look into the report to find the information.</i></p> <p><i>On p34 is my Resume. It is attached as well. My address and SACNASP number is there.</i></p> <p><i>The date of my site visit is in there as well, but I looked it up from the SASS5 biomonitoring sheet in the appendix. The date was 20 September 2021 and I spent most of the day there, 6 hours in total. This was at the end of the rainy season, so it was a good time to look at the vegetation at its best in the winter rainfall area.</i></p> <p><i>There were no uncertainties. This is an off-channel dam on an old vineyard that will be filled with water out of an irrigation channel. This is water that has been officially allocated, an existing legal use, so there will be no additional impact on the Olifants River. No additional abstraction and no additional impact on the Ecological Reserve. It would be beneficial if the DWS could publish their recent biomonitoring data for all of us to use so that we do not have to rely on only what we collect. The prescribed evaluations, such as the Risk Matrix, rests on the experience and knowledge of the specialist. Another specialist will allocate slightly different numbers, but the outcome will most likely be the same”.</i></p>	2.11 Dr. Dirk von Driel (appointed freshwater specialist)