



KLEINVLEI DAM - DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS RECEIVED (September - October 2021)

Date	Issue	Comment	I&AP	Response	Respondent
	General				
20 September 2021		As stated in our previous letter, the proposed dam is located in an area historically covered by Kouebokkeveld Shale Fynbos, which is listed as Vulnerable vegetation type. However, most of the dam site has been previously ploughed although there appears to be some rehabilitation occurring on the ridge areas. The area north of the site has been determined as Critical Biodiversity Area (CBA) as these areas are important not only for protection of terrestrial habitat but also for groundwater recharge, watercourse and water source protection. To the east of the site is the Koue Bokkeveld Mountain Catchment Area (MCA), As stated in the report the proposed dam wall is located in an area determined as Ecological Support Area 2 (ESA 2) which are areas that are acknowledged as being degraded or even transformed but which ideally should be rehabilitated to the point where some ecological functioning returns.	Alana Duffell-Canham - CapeNature	Noted	EnviroAfrica
		In general, CapeNature does not support new instream dams or enlargement of existing instream dams unless it can be shown that the condition of the catchment, particularly downstream of the dam, will not worsen and that other compensation measures are put in place. In this case we acknowledge that the dam site is in a non-perennial watercourse and that much of the immediate surrounding area has been modified and become degraded.		Noted.	EnviroAfrica
05 October 2021		The impacts associated with the proposed development have not been assessed in terms of Appendix 3(3)(1)(j) of the EIA Regulations, 2014 (as amended).	Ayesha Hamdulay - DEADP	Noted. This has been amended in Appendix 9	EnviroAfrica
		The impacts associated with the proposed development must be assessed in terms of the above and must be included in the final EIAR.		Noted. This has been amended in Appendix 9	EnviroAfrica
		Environmental Management Programme ("EMPr") 3.1. It is noted that the Maintenance Management Plan ("MMP") has been included as a separate document in the draft EIAR. Please note that the MMP must be included in the EMPr.		Noted. The MMP as been included as Appendix 15 of the EMPr	EnviroAfrica
		Further, the MMP refers to the development of reno-mattresses and the placement of sandbags to prevent erosion. Please be advised that no development of new structures must form part of the MMP unless it have not been assessed as part of the EIA process. All reference to the development of new structures must be removed from the MMP.		Noted. Reference to the reno-mattresses has been removed from the MMP, and included in the infrastructure description of the EIR. The reno-mattresses would have been assessed by the Freshwater Assessment, as these were recommendation by the specialist. Please also note that the sand-bags is not part of this infrastructure, but just a proposed mitigation measure should any erosion occur on the dam wall during the operational phase of the dam due to heavy rain events.	EnviroAfrica
		Declarations 4.1. It is noted that the declarations as completed by the applicant, the Environmental Assessment Practitioner and some of the specialists have not been included in your draft EIAR.		Noted. These have been included with the Final EIR	EnviroAfrica
		Please be advised that the date of when the site notices were placed at the various locations must be included in the final EIAR.		18 November 2019. This has been included in the Final EIR and in Appendix 6B	EnviroAfrica
		The Department awaits the submission of the final EIAR in electronic format. You are reminded that the deadline to submit the final EIAR is 13 December 2021.		Noted	EnviroAfrica
		You are reminded that it is an offence in terms of Section 49A of the NEMA for a person to commence with a Listed Activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity.		Noted	EnviroAfrica