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South African Heritage Resources Agency
111 Harrington Street
PO Box 4637
Cape Town
8000

Johannesburg

14 Eglin Road
Sunninghill 2191
PO Box 2700
Sunninghill 2128

Tel: +27 11 519 4600
Fax: +27 11 807 5670
Web: www.gibb.co.za

Email: phine@sahra.org.za

Attention: Phillip Hine

ESKOM ENVIRONMENTAL IMPACT ASSESSMENT (EIA: 12/12/20/944) FOR A PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

Arcus GIBB (Pty) Ltd (GIBB) acknowledges receipt of the submission received from SAHRA discussing the above report. We thank you for your valuable comments and your participation in the Eskom Nuclear Power Station (Nuclear-1) Environmental Impact Assessment (EIA) process. Your questions and comments concerning the Nuclear-1 have been noted.

Responses to your submission are provided in table format for ease of reference. We thank you for providing us the opportunity to respond to these comments. Please do not hesitate to contact us should you require any additional information regarding this proposed project.

Should you have any queries with respect to the above please do not hesitate to contact Arcus GIBB.

Yours faithfully
For Arcus GIBB (Pty) Ltd



Jaana-Maria Ball
Nuclear-1 EIA Manager

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Phillip Hine SAHRA	<p>1 INTRODUCTION</p> <p>Eskom proposes the development of a single Nuclear Power Station (Nuclear-1) at three alternative sites, Duynefontein (Western Cape), Bantamsklip (Western Cape) and Thyspunt (Eastern Cape). This review comment applies only to the proposed Thyspunt site. The Duynefontein and Bantamsklip sites fall within the jurisdiction of Heritage Western Cape, the commenting authority for developments in the Western Cape.</p> <p>Archaeological research and surveys around the Thyspunt and Cape St. Francis area indicate it to be, one of the richest in the density of well-preserved archaeological sites in South Africa.</p> <p>The South African Heritage Resources Agency (SAHRA) understands that initially five sites were identified during the Scoping Phase. These included two sites along the Northern Cape coastline, namely Brazil and Schulpfontein. These two sites have since been 'scoped out' and are no longer considered for the development of the current Nuclear Power Station (NPS). However, the South African Heritage Resources Agency was not consulted during the scoping phase and received the Scoping Report after the deadline for commenting expired. Furthermore, heritage was not considered during the decision to exclude the Northern Cape sites from the Environmental Impact Assessment process. The reasons for scoping out the two Northern Cape sites are not clear but it is broadly understood that "financial implications" were a factor.</p> <p>The current Environmental Impact Assessment examines the NPS while</p>	<p>Thank you it is noted that this submission relates to the Thyspunt site.</p> <p>This is noted and is corroborated by the Heritage Impact Assessment (HIA). It is for this reason that the coastal area where density is the richest a no go area has been stipulated in the mitigation measures. If the nuclear power station goes ahead this would result in securing the archaeological richness from any other forms of development which could result in an impact.</p> <p>Eskom's Nuclear Site Investigation Programme (NSIP) in the mid-1980s investigated the technical feasibility of five alternative sites, namely Thyspunt (Eastern Cape), Bantamsklip and Duynefontein (Western Cape), Brazil and Schulpfontein (Northern Cape). All these alternative sites were found to be technically feasible for the construction, operation and decommissioning of a conventional nuclear power station. However, because of the difficulty to integrate with the transmission system (amongst other reasons) the Northern Cape sites were removed from further consideration at the end of the Scoping Phase of this EIA. The full detail of this was presented to SAHRA in a meeting which took place ???</p> <p>It is incorrect to state that SAHRA was not consulted during the scoping phase. SAHRA has been included on the Nuclear-1 database since the inception of the Scoping Phase. A record of the correspondence with SAHRA is included at the end of this table.</p> <p>Whilst it might be ideal to consider the potential impacts of the power</p>

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	<p>other related infrastructure, such as the transmission lines, will form part of a different EIA process. SAHRA is concerned that the lack of an integrated EIA (and its related Heritage Impact Assessment) process, examining all related infrastructure and how these may impact on the heritage quality of the area, has resulted in a lack of understanding of the cumulative impact that the NPS will have on the broader cultural landscape. SAHRA is concerned about the investigation of related developments on a “piece-meal” basis, in particular where cumulative impacts will likely be on a regional scale.</p> <p>The heritage specialist report submitted to the SAHRA Archaeology, Palaeontology and Meteorite (APM) Unit, included an Archaeological Impact Assessment and Palaeontological Desktop Study (for Bantamsklip and Thyspunt only). The different specialist studies will be discussed separately.</p> <p>2 ARCHAEOLOGICAL IMPACT ASSESSMENT</p> <p>The Archaeological Impact Assessment for the Thyspunt area was conducted by the <i>Archaeology Contracts Office (ACO)</i> based in the Archaeology Department at the University of Cape Town. The specialist indicated that ground vegetation cover was extremely dense limiting visibility and allowing less than 20% of the study area to be effectively surveyed. Despite this, approximately 145 archaeological sites were identified. According to the specialist report, archaeological resources are prolific in the Thyspunt area and the NPS will likely result in a “<i>very high heritage casualty rate</i>”. The range of the identified heritage resources is summarised as follows by the specialist:</p> <ul style="list-style-type: none"> • <i>Middle Stone Age scatters on almost all exposed palaeosols (sic) within the active dune system.</i> • <i>Later Stone Age shell middens are numerous within 300-400 metres of the coastline and in the active dunes, with the highest</i> 	<p>station and all three transmission corridors in a single document, this is not practically possible and would result in an unmanageable process and in all likelihood a set of documentation that would make understanding of the key issues impossible.</p> <p>The results of the Heritage Impacts Assessment for the Thyspunt Transmission lines has been released into the public domain and do not suggest any major areas of concern. The report however was not based on a field assessment since the actual alignment will be within a corridor that has been broadly identified. The report has been supplied to and read by the heritage specialist working on the Nuclear-1 EIA, Dr. Tim Hart.</p> <p>In terms of living heritage, the site has been off limits to all but a few tenants and the St. Andrews shack occupants for more than 20 years. The site is not used for collection of medicinal materials and is not visited for religious and other purposes. The report indicates that the heritage on the site is the heritage of many South Africans of Khoi or San origins; however the archaeology cannot be attributed to any single group. The Gamtkwa community has indicated that they treasure the area on account of its heritage, on behalf on the interest of all Khoisan origin South Africans. However in terms of “living heritage” no particular concerns were identified.</p> <p>With regard to the many sites, their will be limited direct impact on them due to their location which is not impacted by the footprint of the power station and therefore can be protected. The sensitive areas have been identified by the Archaeologist and are indicated as no go zones.</p>

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	<p><i>concentrations being situated on the shoreline close to shallow bays in rocky shores and spring eyes. The majority of the middens are noted to be well preserved.</i></p> <ul style="list-style-type: none"> <i>A well preserved complex of fish traps.</i> <i>Three shipwrecks (sic) are known to have occurred in Thysbaai during the 19th century.</i> <i>The St. Andrews Shack, which is still being used by the school, has "living heritage" value.</i> <i>The natural wilderness qualities (of the area) will very likely be severely impacted by the proposed Nuclear Power Station and also by the associated infrastructure which has not formed part of this Environmental Impact Assessment process.</i> <p>In addition, the specialist indicated the significance of the area as follows:</p> <ul style="list-style-type: none"> <i>The area is highly significant in terms of its Later Stone Age pre-colonial archaeology, with special reference to the large volume and diversity of well preserved shell middens that is relatively uncommon elsewhere in South Africa.</i> <i>The Middle and Early Stone Age material identified on the fossil dunes is potentially important in scientific terms, especially if it is preserved in an in-situ context on paleosoles deep under shifting dunes in association with fossil bone.</i> <i>The cultural landscape significance of the place relates mainly to its superb natural heritage, pre-colonial heritage, setting and contribution to the wilderness qualities of the region.</i> 	<p>Your comment is noted and the mitigation measures and site specific recommendations proposed by the specialist are confirmed.</p>

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	<p>2.1 2.1 Author's Site-Specific recommendations</p> <p>The specialist indicated that, of the three proposed sites, successful mitigation of heritage resources at Thyspunt will be the most difficult due to access problems. Moreover, "avoidance and conservation offsets may be an option worth exploring". The following site specific recommendations were suggested by the author of the specialist report.</p> <ul style="list-style-type: none"> • <i>Archaeologically sensitive areas must be avoided: a setback of 300 m from the shoreline will result in the conservation of a substantial amount of archaeological sites.</i> • <i>The active dune system must be avoided.</i> • <i>Given that much of the footprint of the Nuclear-1 will lie in vegetated areas, archaeological and palaeontological (sic) heritage identification and sampling will not be possible until bush clearing has taken place. Up to one year must be allowed for archaeological trial excavations and mitigation.</i> • <i>It is recommended that 30 Later Stone Age archaeological sites, representing a full range of site context, character and cultural affinity within or close to areas of impact, be identified and comprehensively sampled, analyzed and radiocarbon dated (estimated duration: six months to one year fieldwork pre-construction, one year follow up analysis).</i> • <i>Work with the applicant to ensure that a suitable facility for the safe indefinite storage of any finds is made available, be it at a museum or a specially designed facility in the Eastern Cape Province.</i> • <i>During the construction period (especially land clearing and bulk excavation) an archaeologist and/or representative must initially be</i> 	

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	<p><i>on site at all times that bulk excavation is taking place. If there is good reason to believe that the site is not sensitive, the frequency of monitoring can be decreased.</i></p> <ul style="list-style-type: none"> <i>In the event of a find of fossil bone (which in the case of Thyspunt is a very strong possibility) or artefactual material, the archaeologist will need to identify the horizon that the find is associated with and, if necessary, be given the opportunity and budget to bring a "rescue" team onto site to excavate the find, expose the material and sample it accurately and adequately.</i> <i>The fact that old land surfaces and fossil faunas that inhabited them are preserved in the study area means that there is a possibility that fossil human remains may exist on or close to the site. Fossil human remains may exist on or close to the site. Fossil human remains from the late Pleistocene (and earlier) are very rare and of exceptional scientific importance on a global scale. Any find of this kind must be removed by an archaeologist with appropriate care. In the unlikely event of a find such as this occurring, it is requested that the applicant facilitate the necessary work in such a way that it is done to the highest standards, and as quickly as is reasonable.</i> <p>3 PALAEONTOLOGICAL DESKTOP STUDY</p> <p>The Palaeontological Desktop Study was conducted by Dr. John Almond of <i>Natura Viva</i> cc. The Desktop Study focuses on the Bantamsklip and Thyspunt NPS sites, since detailed strategies for Dynefontein have already been established elsewhere. The specialist indicated that the palaeontological sensitivity for the Thyspunt NPS is only moderate to low compared to Koeberg, and "there are no serious palaeontological grounds for choosing between (Bantamsklip and Thyspunt) them". Thyspunt lies on the Table Mountain Group (TMG) sediments of Early Palaeozoic age which, being moderately to highly deformed "well</p>	<p>These mitigation measures, as indicated by SAHRA are proposed to protect the site during and after construction and will provide a means of permanently preserving the area as well as an opportunity complete further studies.</p>

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	<p>preserved fossil material", are not expected to be present at the site. However, younger horizons such as the Salnova Formation are "characterized by rich fossil fauna of shelly invertebrates ("Swartkops Fauna") that are of considerable palaeontological and palaeoenvironmental interest". It should also be noted that only the immediate footprint of the reactor site was investigated by the specialist, and that the broader palaeontological heritage must be investigated once the entire footprint has been established.</p> <p>According to the Desktop Study the Thyspunt NPS overlies the striking contact between the Goudini Formation and Skurweberg Formation of the Nardouw Subgroup (upper TMG). However, the overall palaeontological significance of these Palaeozoic TMG quartzites is relatively low. Nevertheless, the highly sensitive Ordovician Cedarberg Formation of the Table Mountain Group underlies the coastal plain within 2km of the NPS site location and this is regarded as a highly sensitive palaeontological unit.</p> <p>Pre-Pleistocene sediments are not expected to be encountered as these have been eroded by the Mid-to-Late marine transgressions. However, it is noted that rich fossiliferous beds may be found further inland as part of the broader Nuclear 1 footprint. The specialist indicated that the following potential palaeontological resources may be identified at Thyspunt:</p> <ul style="list-style-type: none"> • <i>Rich fossil fauna of shelly invertebrates of the Salnova Formation that is of considerable palaeontological and palaeoenvironmental importance and which will require extensive mitigation.</i> • <i>Unique post-glacial biota of invertebrates and primitive jawless fish showing soft tissue preservation in the sensitive 'red flag' unit of the Late Ordovician Cedarberg Formation which will require extensive mitigation.</i> • <i>A wide range of Miocene-Pliocene marine fossils - mainly mollusks, urchins, corals, bryozoans, brachiopods, sharks' teeth, benthic</i> 	<p>Your comment is noted and the mitigation measures and site specific recommendations proposed by the specialist are confirmed.</p>

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	<p><i>foraminifera and trace fossils.</i></p> <ul style="list-style-type: none"> • <i>Peat horizons within the Nahoon Formation yielding data on contemporary vegetation and palaeoclimates.</i> <p>3.1 3.1 Author's Site-Specific Recommendation</p> <p>The following site specific recommendations have been recommended by the specialist:</p> <ul style="list-style-type: none"> • <i>Regular monitoring of all deeper excavations into Caenozoic sediments by a qualified palaeontologist, with ample opportunity to sample fossiliferous units and record relevant sedimentological data.</i> • <i>Interesting Palaeozoic fossils uncovered during excavations must be sampled by the responsible palaeontologist.</i> • <i>Impacts beyond the immediate reactor footprint on older palaeontologically sensitive horizons such as the Cederberg Formation (Late Ordovician invertebrates and fish) will have to be assessed in more detail when the site for the NPS is finally chosen.</i> <p>4 DISCUSSION</p> <p>The impact of the Nuclear Power Station and all its associated and related developments will be considerable and, in terms of the heritage, irreversible. Heritage is a non-renewable resource which cannot be rehabilitated. The Archaeological Impact Assessment report indicated that the current project could result in the biggest rescue operation of heritage resources, and in particular the archaeological resources, to date in South Africa. The SAHRA is particularly concerned about the cumulative impact that the development will have on the heritage</p>	<p>Palaeontology: This level of detail of assessment is currently not possible within the least sensitive zone as the area is entirely vegetated and covered with many meters of sand. The only opportunity to do this will be during bulk excavation for the plant itself, and again this will depend on the kind of technology used for the bulk excavation (e.g. dredging and bentonite stabilised walls will not allow any examination of the sections).</p> <p>The author of the Heritage Impact Assessment, Dr. Tim Hart, and the Environmental Impact Assessment Practitioners, GIBB, are not in disagreement with SAHRA's findings and comment, however it is suggested that given that there are "question marks" with respect to the sensitivity of the proposed nuclear site target area in the thicket between the shore dunes and inland dune field, SAHRA should consider allowing an extension to the assessment by permitting a phase of trial excavation to investigate the sub-surface conditions. There may be a possible opportunity to construct the power-station with minimal physical damage to heritage material, however the cultural landscape issues would always be very difficult to mitigate, in this regard one needs to consider the current need for electricity which provides an opportunity for development in South Africa and will also provide opportunities for the present communities in the Kouga area. The exclusion zone would offer long term protection to heritage material under its control.</p>

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	<p>significance of the area. Currently, it is difficult to calculate this cumulative impact since associated infrastructure will be examined during different Environmental Impact Assessments, but it is expected to be much greater than presently understood.</p> <p>In combination all these developments would completely transform the landscape from its current pristine wilderness character to an industrial zone. This would in turn negatively impact on the sense of place of the area and likely diminish the heritage quality which the archaeological specialist had indicated to be one of the most unique in South Africa.</p> <p>4.1 SAHRA's Comment</p> <p>SAHRA does not approve this development for a wide range of reasons including the following:</p> <ul style="list-style-type: none"> • <i>From a heritage perspective, Thyspunt is the least preferred option due to the density of heritage sites, the technical difficulties in achieving successful mitigation and an unacceptably high heritage casualty rate.</i> • <i>Considering the heritage significance of the area and the scope of the proposed project, a full combined Heritage Impact Assessment should have been undertaken. This full combined HIA should have examined all aspects of heritage including intangible and living heritage. Moreover, the impact all developments related to the NPS must be considered together in this combined HIA ('section 38(2) (b) and 38(3 b & c) of the NHRA (Act 25 of 1999)).</i> • <i>The cumulative impact of the proposed project will likely be far greater than what is currently understood since associated infrastructure, such as for instance transmission lines, will be examined in a separate Environmental Impact Assessment.</i> 	<p>The author of the HIA further believes that SAHRA should consider very carefully the implications of a 'no-go' as SAHRA would have to declare the site and thereafter be responsible for its ongoing alternative use/ management.</p> <p>It is also anticipated that property development in this area will do and has already done substantial damage to heritage conservation in the area. The building of the nuclear power station provides an opportunity to protect the archaeological sites at Thyspunt.</p> <p>The findings of the Tx EIA and the Generation EIA can be considered by SAHRA and the Department of Environmental Affairs, at this point indications are that there are not significant Heritage issues associated with the Tx lines.</p> <p>A application has been submitted to SAHRA for further investigation which will inform the mitigation strategy. It was also indicated by the specialist that it is unlikely that there are significant sites to be found in the thicket based on evaluation of roads going through this area.</p> <p>As proposed by Eskom in a recent meeting with SAHRA, Eskom would be willing to provide both the facilities and support the</p>

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	<ul style="list-style-type: none"> • <i>Less than 20% of the Thyspunt NPS corridor could be properly surveyed and it is expected that the number of identified archaeological sites will increase significantly.</i> • <i>The archaeological specialist indicated that the proposed activity has the potential to evoke the biggest heritage rescue operation in South Africa.</i> • <i>Any mitigation will be extremely lengthy and costly. Extensive volumes of deposit would need to be excavated, analysed, curated which will place strain on the storage capacities of South Africa's Heritage Institutions.</i> • <i>The NPS and other associated infrastructure will have adverse impacts on the 'sense of place' and its 'wilderness' qualities which are appropriate to the preservation of the pre-colonial cultural landscape characteristics.</i> • <i>The change in landscape from its pristine wilderness area fitting for such a unique heritage landscape into an industrial zone.</i> • <i>NO suitable alternative in the Eastern Cape was examined with the 'No Go' option not being considered. Since the Thyspunt area has high heritage significance and the cost of mitigation will be considerable, a less sensitive site alternative would provide a more feasible option both in terms of heritage loss and rescue operations.</i> • <i>According to the Heritage Scoping Report, Brazil and Schulpfontein were the two most preferred sites.</i> <p>In conclusion, the South African Heritage Resources Agency, whose mandate is the conservation of heritage resources for present and future generations, cannot approve any developments that will have a major deleterious effect on the heritage of a highly significant cultural landscape</p>	<p>manpower requirements to ensure that this activity is carried out in an effective and successful manner.</p> <p>While the sense of place is recognised, heritage is only one of many aspects to be considered in this EIA process. There are limited sites available in South Africa where nuclear power stations can be placed. With South Africa's commitment to Climate Change, nuclear will become more prominent in the energy mix (refer to Draft Integrated Resource Plan published by the Department of Energy). This aspiration may not be achievable if a site, such as Thyspunt is disqualified. Thyspunt was selected as a preferred site for a nuclear power station subsequent to an extensive process which evaluated the majority of the South African coast.</p> <p>Alternative sites in the Eastern Cape were explored during the Nuclear Site Investigation Programme. Further the option of Coega has been explored during this EIA process. On the first enquiry at the beginning of the process it was indicated that there was not a site available which could be considered. Subsequent to this a site became available. This was considered by Eskom and will be discussed in the Revised Draft Environmental Impact Assessment.</p> <p>A meeting has taken place, where many aspects were discussed, an application has been made by Eskom and Dr Tim Hart to further investigate the areas which were inaccessible and Ms Maria ?? has made a visit to the Thyspunt site.</p>

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	<p>such as Thyspunt. It is the belief of the SAHRA that the impact on the heritage resources will be too severe and that mitigation will not achieve the desired effect.</p> <p>Please inform SAHRA of your decision and any other decisions in terms of the heritage resources for which SAHWA APM Unit must provide comment and requirements in terms of mitigation and conservation planning.</p>	

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SOUTH AFRICAN HERITAGE RESOURCES AGENCY

No	Name	Position	Contact Details	Entered on database	Ref No of first communication	Date of first correspondence	Key Sholder Invite (indicate which ones)	Attendance at KSW Yes/No	Offer of a FGM by ACER
1	Ms J Kitto	Assistant Regional Manager	P O Box 87552 Houghton 2041	05 April 2007	Letter 01E	25 May 2007	None sent		No
2	Mrs Beverley Crouts-Knipe	Provincial Manager SAHRA: WC	P O Box 2771 Cape Town 8000 Tel: 021 – 424 5026 Fax: 021 – 424 5027 bcrouts-knipe@wc.sahra.org.za	17 May 2007	Letter 01E	25 May 2007	Sent KSW Invitation on 9 July 2007 And invitation to KS Feedback Meeting on 1 Feb 2008 And invitation to KS Feedback Meeting on 3 March 2010	No No	No
3	Ms Mary Leslie	Head of Archaeology	PO Box 4636 Cape Town 8000 Tel: 021 – 462 4502 Fax: 021 – 462 4509 mleslie@sahra.org.za	17 May 2007	Letter 01E	25 May 2007	Sent KSW Invitation on 9 July 2007 And invitation to KS Feedback Meeting on 1 Feb 2008 And invitation to KS Feedback Meeting on 3 March 2010	No No	No
4	Mr Phillip	APM Impact Assessor	P O Box 4637 Cape Town	1 July 2010	Entered as per email received				

	Hine		8000 Tel: 021 462 4502 Fax: 021 462 4509 Email: phine@sahra.org.za		with comments				
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All Correspondence sent to J Kitto to date

POD/MTG ID	Description
BID	Background Information Document
L01E	Announcement of Project 25 May 07
L04E	Letter 04E Scoping Extension 26 July 07
L05E	DSR Availability Letter - 28 Jan 08
L08E	DSR Comment period extension - 14 Mar 08
L11E	Final Scoping Report Availability - 4 Aug 08
L12E	Project Update Letter 22 Jan 09
L13E	Letter 13 Revised POS for EIA 18 May 09
L14E	Draft EIAR Availability 3 Mar 10
L17E	DEIAR Comm Period Extension 6 May 10
L23E	DEIAR Further Comm Period Extension 27 May 10

All Correspondence sent to Mary Leslie to date

POD/MTG ID	Description
BID	Background Information Document
L01E	Announcement of Project 25 May 07
L03E	KSW Invitation 9 July 07
L04E	Letter 04E Scoping Extension 26 July 07
L05E	DSR Availability Letter - 28 Jan 08
L07E	KS Feedback Meeting Invite 1 Feb 08
L08E	DSR Comment period extension - 14 Mar 08
L11E	Final Scoping Report Availability - 4 Aug 08
L12E	Project Update Letter 22 Jan 09
L13E	Letter 13 Revised POS for EIA 18 May 09
L14E	Draft EIAR Availability 3 Mar 10
L15E	KS Feedback Meeting Invite 3 Mar 10
L17E	DEIAR Comm Period Extension 6 May 10

POD/MTG ID	Description
L23E	DEIAR Further Comm Period Extension 27 May 10

All Correspondence sent to Beverly Crouts-Knipe to date

POD/MTG ID	Description
BID	Background Information Document
L01E	Announcement of Project 25 May 07
L03E	KSW Invitation 9 July 07
L04E	Letter 04E Scoping Extension 26 July 07
L05E	DSR Availability Letter - 28 Jan 08
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