

COMMENTS AND RESPONSE REPORT FOR THE DRAFT EIA REPORT MADE AVAILABLE FOR PUBLIC REVIEW – REVISION OF SELECTED RESPONSES AS PER THE REQUEST OF THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS TO THE APPLICANT ON 19 JULY 2012

✉ - email; 📠 - facsimile; ☎ - telephone

Respondent & organisation	Issue / concern*	Date	Means of Communication	Comment / Query	Response
12) Samantha Ralston Cape Nature: Scientific Services	Comments on Draft EIA Report	02 Dec2011	✉	<p>CapeNature would like to thank you for the opportunity to comment on the above report.</p> <p>Please note that our comments relate only to the potential impacts on biodiversity and not the overall desirability of the proposed development.</p> <p>CapeNature supports the promotion and development of renewable energy facilities, including wind turbines. However, it must be recognised that the potential impacts on biodiversity of this relatively new technology are not yet fully understood in South Africa. We are further concerned that if not properly considered and planned for, the cumulative impacts of these facilities on biodiversity could be quite significant. It is therefore essential that a precautionary approach is taken and that turbines are placed outside of ecologically sensitive areas. It is also vital that a clear monitoring and reporting protocol is put in place so that lessons learned from newly established facilities can be shared with the wider community.</p>	<p>Arcus GIBB hereby acknowledges receipt of the comments received by CapeNature and thank you for your input into the process.</p> <p><u>Additional Comment as at 10 August 2012:</u> Subsequent to the receipt of this correspondence and additional correspondence dated 02 February 2010 and 07 March 2012 as well as a meeting with yourself on 25 July 2012 the applicant submitted a document to Cape Nature detailing the manner in which comments and concerns raised by Cape Nature will be addressed. The document was submitted to Cape Nature on 30 July 2012.</p>

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				<p>With regards to this particular application, we support the findings and recommendations of the biodiversity related specialists, although there are some significant limitations in respect of the scope of these studies. These specialist assessments confirmed that the receiving environment includes areas that are sensitive in terms botanical, avifaunal and faunal biodiversity.</p> <p>Impacts on avifauna and fauna: Our primary concern with this proposed wind farm is the potential impacts on avifauna (including bats). The area is next to a recognised Important Bird Area and contains several potentially sensitive species.</p> <p>We are of the opinion this impact assessment should have included specialist bat and bird assessments which were based on site visits conducted over an entire year (as recommended in EWT/ Birdlife Africa's best practice guidelines). The information from such studies would allow for actual species presence, breeding sites, flight paths, habitat preferences to be determined and would have provided a degree more clarity and certainty with regards to which species are potentially impacted and where they occur. The</p>	

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				<p>results of these surveys could have a marked effect on the predicted significance of the potential impacts and therefore are necessary for informed decision-making.</p> <p>We also suggest that these site surveys should be used to inform what mitigation measures are required. This information is required before authorisation, as essential mitigation measures should be enforceable (i.e. be conditions of approval). It is also necessary to confirm if any mitigation measures that may be necessary are in fact feasible. We are therefore disappointed to note that these surveys have not been undertaken and that the vast majority of both the faunal and avifaunal studies were based on desk-top information.</p> <p>While the recommended pre-construction (but post authorisation) monitoring does offer some scope for limited improvements to be made, this approach does not support informed decision making. That is not to say that preconstruction monitoring has no value, but its value lies primarily in helping improve our understanding of the impacts of wind farms on avifauna (provided this is followed by post-construction monitoring), not the desirability of the proposed development itself.</p>	

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				<p>A further concern is that even if we had more information regarding the actual species present on site, we have very little idea of the impact that wind turbines will have on these particular species. Most of the specialist's findings in this regard are speculation based on evidence from overseas as no scientific work has been done here. It must therefore be assumed that there is a very real risk that birds and bats could be negatively impacted on by the proposed wind farm. Whether these impacts will be of significance to local or regional populations of various species is unclear as we lack any species-specific empirical data on which to base predictions.</p> <p>While the specialists are of the opinion that, with appropriate mitigation, the significance of the impacts are likely to be low to moderate, the confidence in these predictions can be regarded as moderate at best.</p> <p>Faced with such uncertainty, there are two choices:</p> <ul style="list-style-type: none"> · One could evoke the precautionary principle and suggest that no development should take place where there are high densities of threatened species such as Blue Cranes. While this would help safe-guard the species from any negative impacts of collisions with 	

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				<p>turbines, it would also preclude wind farms from being built in large parts of the province.</p> <ul style="list-style-type: none"> · Alternatively one could allow a small facility to be built under strict controls and with extensive and scientific pre and post- construction monitoring. If this option is pursued it is vital that such information be independently analysed and the results widely disseminated to inform future assessments and decisions. <p>While additional monitoring of species flight paths prior to approval will increase our confidence in the predicted impacts slightly, it is only once we have empirical data on avoidance and collision rates that the impacts of wind farms on species can be accurately predicted. CapeNature is therefore of the opinion that the environmental gains of pursuing the latter option are likely to outweigh the risks associated. However, given the large number of similar applications in the pipeline, CapeNature would urge the decision-makers to commit to approving a limited number of facilities in potentially sensitive areas until we have a better understanding of the impacts. We also suggest that a precautionary approach should be adopted and all high risk areas should be avoided. The cumulative negative impacts of wind farms could otherwise be of high negative significance.</p>	

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				<p>Despite the limitations of the faunal and avifaunal studies stated above, the specialists included detailed recommendations with regards to mitigation, which include proposed changes to the layout, monitoring and other management interventions. It is unclear which of these are considered feasible, although we do note with concern that layout has not been changed in response to the ornithologist's recommendations (who recommended that 14 turbines be removed from the high risk areas). It is unclear why these amendments are not considered feasible.</p> <p>Should this application be approved, we urge that the mitigation measures as proposed by the ornithologist are included as conditions of approval. Pre-commencement monitoring must be instituted as soon as possible (although ideally this should take place before authorisation is considered). This should be done over a period of at least a year and the data should be used to inform any additional mitigation measures required to reduce the impact on birds at these sites.</p> <p>We suggest that similar monitoring should be done for bats as international experience has demonstrated that bats may be more vulnerable to the impacts</p>	

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				<p>of wind farms than birds.</p> <p>It is vital that monitoring follows standard protocols across South Africa (we understand that DEA, together with Birdlife South Africa and EWT are developing these) so that the results from different areas can be compared. To ensure accurate results we suggest that monitoring must be undertaken by an independent specialist and audited annually for compliance. The applicant should be required to set aside sufficient funds to allow for this and penalties should be put in place for failure to observe monitoring and reporting protocols, including the possible withdrawal of the authorisation.</p> <p>The EIA regulations make provision conditions of authorisation to be amended, or even for an authorisation to be suspended, if this is necessary to prevent harm to the environment. Should this development be approved we suggest that, given the considerable risks to a threatened species, DEA must agree to consider amending the conditions of approval (or even suspending approval) should the results of the monitoring indicate that this is desirable.</p> <p>Mitigation could include expensive interventions such as prohibiting the use of feed bins near the turbines, mandatory shut-down periods and the</p>	

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				<p>use of radar. We suggest that the applicant must be made aware of this risk.</p> <p>A further complication is that since the landowner is not the applicant, some of the mitigation measures require agreement from the landowner. For example, some birds are attracted to feed bins that farmers place in the fields for sheep and this could cause an increase the risk of bird mortality. Should this become a problem, the landowner may be required to cease this activity and may need to be compensated for any loss incurred as a result. Agreements will need to be put in place to allow for this.</p> <p>Botanical impacts</p> <p>We support the findings and recommendation of the botanical specialist. Given the critically endangered status of the vegetation, we suggest that even degraded remnants are of high conservation value and should be avoided. We are therefore pleased to note that the majority of the proposed turbines and associated infrastructure will be located outside of the areas identified as sensitive by the botanical specialist. We are, however, concerned that not all of the botanist's recommendations have been implemented and some proposed wind</p>	

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				<p>turbines and infrastructure are still located in areas of high conservation value. Once again, it is unclear why it was not considered feasible to move them and we support the botanical specialist's finding that this will have impacts of medium to high negative significance. These impacts will largely be irreversible and the loss of critically endangered habitat cannot be adequately mitigated.</p> <p>If and where impacts on natural vegetation of high conservation value are deemed truly unavoidable, we suggest that these areas should be the subject of more detailed botanical assessment, including a site visit in the peak spring flowering season. This will ensure that the impacts of the activity, for example on threatened species can be fully understood. We suggest that any unavoidable impacts on critically endangered habitat and/or threatened species must be clearly outlined and appropriate mitigation measures proposed.</p> <p>We are further concerned that the exact location of the turbines does not appear to have been finalised and micro-siting may still be required. While CapeNature recognises that there may be a need to fine-tune the exact layout, we suggest that there must be a clear commitment that areas of high conservation value</p>	

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				<p>will be avoided.</p> <p>The compatibility of a wind farm and its associated infrastructure with a fire-driven ecosystem must also be considered and assessed. Will it be necessary to exclude fire from the area? If so, how will this impact on the surrounding habitat?</p> <p>Once again, it is not clear which mitigation measures proposed are considered feasible and will or can be implemented. Again, some of these, specifically those relating to the management of natural habitat and securing it for conservation, are complicated by the fact that the applicant is not the landowner. We suggest that it is necessary to demonstrate that the landowner is willing to adopt these measures and that the necessary agreements are in place. In particular, CapeNature notes that it has been recommended that a stewardship agreement be entered in to. This could be critical to offset the loss of natural vegetation should the current proposed layout be approved. Please note that it is the landowner who must enter into the stewardship agreement and an indication needs to be provided as to whether the applicant and landowner are willing to enter into such an agreement. This should preferably be</p>	

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				<p>done by means of a three way memorandum of understanding drawn up between the applicant, current landowner and CapeNature.</p> <p>Wetlands and streams</p> <p>Please note that there are wetland and seep areas mapped on the area in question and many of these are National Fresh Water Ecosystem Priority Area Wetlands. In our previous comments we suggested that if any impacts on aquatic ecosystems are anticipated, an aquatic ecology specialist should be consulted. We suggest that this is necessary to ensure that these features are avoided and where this is not possible, the necessary mitigation measures are put in place. This does not appear.</p> <p>Conclusion</p> <p>CapeNature is concerned that this process has been constrained by the lack of detailed site assessments, lack of clarity with regards to certain impacts and uncertainty around the feasibility of the mitigation measures that have been proposed. We suggest that there is a substantial amount of information still required if an informed decision is to be made regarding this proposed development.</p>	

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				<p>We will gladly comment on any additional information provided for review. CapeNature reserves the right to revise initial comments and request further information based on any additional information that might be received.</p>	
<p>14) Brian McMahon Greyton Resident</p>	<p>Comments on Draft EIA Report</p>	<p>05 Dec 2011</p>	<p></p>	<p>Please can you provide answers to the following:-</p> <p>The Final Proposed Caledon Wind Farm Layout is shown in Figure 17.1 of the DEIR of November 2011. However, farm portion 3/263 (narrow strip in central north area) is not included, but appears on other main maps, and there are 64 turbines instead of the number 71 in the text.</p> <p>Figure 1.3 in the DEIR, titled 'Proposed positioning of the turbines', which does include this portion 3/263, also includes farm portion 1/264 to the north western end of the site, which includes 2 turbines apparently outside the site area (Nos 18 & 37), and another portion due South of farm 4/264, which also has an</p>	<p>Thank you for your email received.</p> <p>In response to your email GIBB can provide the following:</p> <p>Portion 3/263 was quite correctly overlooked from the final layout diagram presented in Figure 17.1. This diagram has been corrected to include this portion of land. Figure 17.1 shows 67 turbines; however GIBB is aware that the image itself was of low quality and has reproduced the final layout diagram as a high definition map, including the correct site boundary, as discussed above. The 67 turbines and their final positions should be easier to identify in the new set of maps.</p> <p>Figure 1.3 was the original proposed layout of the Caledon Wind Farm, however during the course of the project underwent some modifications. During the EIA process portions 1/264 and 4/264 were removed from the study area and turbines located in those portions ultimately also removed. The final project description is that as described in writing in the report. In order to resolve the conflict</p>

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				<p>extra turbine (No 21) outside the 'apparent site area'. A total of 74 turbines are shown.</p> <p>This same portion is shown as part of an adjacent possible energy facility in Figure 24 of the Visual study (Appendix P of the DEIR) – although no such map occurs in the main DEIR report itself.</p> <p>The Avifauna report shows all 74 turbines, whereas the Noise report shows only 63 turbines.</p> <p>There is a series of high definition maps in Appendix S, with quality enough to differentiate the main features and constraints, which show all 74 turbines.</p> <p>Clearly, some reports are referring to old maps (it really would assist everyone if every map included a reference, a date, a scale bar and the source), since when some turbines have been removed and others re-positioned. Helme in his botanical report identifies some specific changes he</p>	<p>as noted by yourself, Figure 1.3 has been replaced with the corrected and updated map as discussed above.</p> <p>The map provided in Figure 24 of the Visual Report reflects the correct boundaries of the Caledon Site. As discussed, portions 1/264 and 4/624 have been removed from the study area. The map included in the visual report was not included within the main report as it has since become outdated and GIBB is not in possession of the latest windfarm information as this is changing constantly. It remains in the visual report as it has been referenced and used to support a general argument.</p> <p>Both the avifauna and noise reports have correctly reported on the project description of (67 turbines) turbines, as well as on the final layout as submitted and commented on in the conclusions chapter.</p> <p>Comment noted. All specialists were provided with a series of maps over the course of the project. In order to solidify specialist comments on the final layout, this was provided to the specialists as the latest version, upon which comments were solicited specifically. GIBB trusts that the corrected and updated high definition map should resolve any further queries with regards to the final turbine positions and layouts</p>

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				<p>recommended that were done and some that were not done - based on an updated map which has seemingly not yet been included in the main report.</p> <p>Some of the turbine re-positioning is done to suit new wind quality information, some to mitigate various significant impacts and presumably some for other reasons. Unfortunately, only the Appendix S HD maps are good enough to reveal all the necessary details - these obviously have not been updated in this case.</p> <p>As you will know, the DEA requires specific information in the maps in order to reach a decision. Unless they are privy to different maps to the published ones that we have seen, the process of evaluation of the EIA is problematic.</p> <p>Can you please confirm the following:-</p> <ol style="list-style-type: none"> 1. What is the correct boundary of the Caledon Wind Farm site? 2. How many turbines in the FINAL layout plan? 3. Accurate positions of all the turbines, access roads, cable trenches, substations (both phases) and noise receptors on a HD map(s) as per Appendix S. 4. Confirmation that specific turbines have been removed and that others have been relocated (x metres in y direction) to avoid a specified constraint 	<p>.</p> <p>Your comment is noted. All updated information will be provided to the competent authority for their consideration.</p> <ol style="list-style-type: none"> 1. Refer to Figure 1.3 and Figure 17.1 as updated. 2. There will be a total of 67 turbines. 3. Refer to Figure 1.3 and Figure 17.1 as updated. <p>The following original turbines have been removed: 3, 5, 8, 13, 18, 21 and 37</p> <p>The following turbines have been relocated: 1, 2, 4, 25, 45, 30, 31, 45 and 54</p>

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				or impact.	<p>These have been indicated in Table 17.2 within the final EIA report submitted to the DEA for decision-making.</p> <p><u>Additional Comment as at 10 August 2012:</u> The applicant has undertaken (upon consultation with Cape Nature and the Department of Agriculture) not to construct any of the turbines that have been proposed for areas identified as high risk from a biophysical perspective by Mr van Rooyen-the Avifauna specialist. These include the following turbines: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72. The applicant has also agreed to remove turbines T17 and T20 as these were the only turbines that remained on Rensoterveld.</p>
15) D.A. Whitelaw Chairman Cape Bird Club Conservation Committee	Comments on Draft EIA Report	07 Dec 2011		<p><u>Floral report:</u> The report makes clear that the potential for damage to 2 rare biomes exists. There are a number of disturbing comments in this report.</p> <p>The investigator visited the area assuming that the area concerned was 1400ha in extent. He later learnt that this was approximately ½ the area involved. We are left with the possibility that the report underestimates the possible intrusion into the natural habitat.</p> <p>ii) The author indicates that it would appear possible to site the turbines in disturbed areas, but it is not whether all 50 turbines could be sited in this area or</p>	<p>Comment noted. This matter was rectified through a subsequent visit to the study area by David Hoare, a registered ecologist, who then specifically mapped the vegetation for the entire study area. David Hoare is also the fauna specialist appointed for the project and is familiar with the study area.</p> <p>The Draft EIA Report indicates that the initial 150 turbines were ultimately reduced to 67 turbines, 2 of which will be placed in degraded, secondary Renosterveld. For each of these turbines, very site specific mitigation measures have been</p>

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				<p>whether he is referring to initial 50. Clearly before any meaningful comments can be made these 2 points need clarification.</p> <p><u>Bird Impact Report:</u></p> <p>It is unfortunate that the author did not consult the ADU – they have extensive records from a number of sources – SABAP2 project although not complete may have provided some data. The CAR (Co-ordinated Avifauna Road counts) has been conducted in the Overberg for many years. Blue Crane and Bustards are important species monitored on these counts.</p> <p>There is a discrepancy between the tables presented as to the veld types in this report and that of the botanical report. The latter reports approx. 60% as totally transformed. The birding report sites tables of 100% fynbos/99% fynbos + 1% forest. While in this report this is mentioned in passing. The differences in spectrum of birds in pristine fynbos and agricultural land could be significant.</p>	<p>proposed in the EMP, which includes plant search and rescue programme and clearly stipulating that this practice must be limited to only those turbines specified, i.e. turbine 17 and 20. In addition, Caledon Wind has agreed that turbines T3a, T5a, T17 and T36 be removed from the proposed development in order for the development's footprint to remain out of both pristine and degraded areas.</p> <p>Comments regarding references noted and captured accordingly. As discussed previously, the detailed vegetation description of the area was undertaken by Nick Helme and later mapped by David Hoare. The Avifauna report aims to more discuss habitats of importance.</p>

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				<p>The author concentrates on Red Data Book species while important an overall assessment of the birds present is also valuable in assessing potential impact.</p> <p>It would be interesting to have the authors comments as to whether monitoring of the area by volunteers to assess more accurately the species composition and numbers may be helpful.</p> <p>The limited data would suggest that wind farms situated near ridges may be involved in greater bird strikes. Would the author recommend having the area patrolled, after construction of the facility (if it is erected) to monitor mortality? Details so limited that these observations are potentially important.</p> <p>It is unfortunate that a key reference Shaw 2007 is not listed</p>	<p>The findings of the EIA process are generally limited to Red Data Species and CITES species. Legally it is unlikely that authorities would stop such a project on account of a non-Red Data species, as the species status as a whole would not permanently be affected by the development.</p> <p>A pre-construction monitoring programme for both birds and bats has been recommended and included within the Environmental Management Plan included in the Draft EIA Report.</p> <p>The developer is also looking to implement construction and post-construction monitoring on site, which will assist for future planning in the area, as well as provide useful information for future projects in the country.</p> <p>Your comment is noted. Mr. van Rooyen is a recognised professional in the field of Avi-fauna and has referenced a number of recognised text and sources relevant to the study in his report. However please provide GIBB with the full title of the reference for our record purposes.</p> <p><u>Additional Comment as at 10 August 2012:</u> The applicant has undertaken (upon consultation with Cape Nature and the Department of Agriculture) not to construct any of the turbines that have been proposed for areas identified as high risk from a</p>

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					<p>biophysical perspective by Mr van Rooyen- the Avifauna specialist. These include the following turbines: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72. The applicant has also agreed to remove turbines T17 and T20 as these were the only turbines that remained on Rensoterveld.</p> <p>Lastly please also note that the applicant has appointed experts for both bird and bat monitoring, subject to being granted environmental authorisation. The applicant expects that it will be possible to gather a minimum of a year's data prior to construction, as required by the recommended mitigation in the Guidelines. The applicant has committed to working with the appointed specialist avifauna consultants and CapeNature Conservation to resolve any problems that are identified as a result of the monitoring in relation to the approved turbine positions. In the event that it becomes necessary the ADU will be contacted in terms of the data they have available.</p>

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18) Dr Stuart Shearer Birdlife Overberg	Comments on Draft EIA Report	31 Dec 2011		<p>Please find comments below.</p> <p>Flora We must again express our dismay that the original undertaking in the DSR was removed from the FSR and now even further downgraded in the DEIA.</p> <p>DSR “Avoiding, at all costs, the placement of wind turbines within Renosterveld vegetation occurring within the study area, regardless of the wind data in those regions”</p> <p>FSR “Avoiding the placement of wind turbines within Renosterveld vegetation occurring within the study area”</p> <p>DEIR “as well as placement as far as possible outside of natural vegetation”</p> <p>All turbines and infrastructure should avoid Renosterveld and Fynbos.</p> <p>We align ourselves broadly with the findings of the botanical report by Helme, though very much doubt that all the recommended mitigation measures will in fact occur, therefore applying the precautionary principle the impact must remain as having an unacceptable Medium – High negative impact on the vegetation on site.</p> <p>We strongly disagree with the vegetation assessment in the Fauna</p>	<p>Two of the original proposed 71 turbines are proposed to be placed in secondary, degraded Renosterveld due to topographical constraints around those particular positions.</p> <p>In light of this, for each of these turbines, very site specific mitigation measures have been proposed in the EMP, which includes plant search and rescue programme and clearly stipulating that this practice must be limited to only those turbines specified, i.e. turbines 17 and 20.</p> <p>Furthermore, in terms of impacts on flora as a whole, given the presence of Renosterveld within the study area, it has been strongly recommended in the EMP for landowners to establish Stewardship Programmes with CapeNature and the developer has indicated their willingness to enter into the proposed Memorandum of Understanding, which has been suggested by CapeNature.</p> <p>Should during the adjudication process by the Department Environmental Affairs (DEA), the authority feel unsatisfied with any of the recommendations, they are able to advise the applicant accordingly to make certain changes.</p>

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				<p>report which grievously misrepresents reality regarding the state and extent of the natural vegetation on site, most of which is 'Critically Endangered', and the remainder 'Vulnerable'. There is in fact approximately 20-35% of remnant natural vegetation (Helme 2011, Flora Report), which is a far cry from Mr. Hoare's description - "most of the site appears to be under cultivation... there is little natural vegetation remaining"</p> <p>Fig. 2 vegetation map shows categorization of natural vegetation but there are no definitions of the categories: 'degraded', 'good', "moderate" as applied to fynbos and Renosterveld. Even partially or extensively degraded natural vegetation can provide viable habitats for indigenous fauna, and also retains significant botanical value.</p> <p>Fauna Frog and bat studies are highly specialized areas of zoology, and should be performed by different experts, not only by your Faunal Specialist (who is in fact a botanist).</p> <p>The report 'lumps' bats with frogs seemingly with little understanding that the two taxa are very different in every aspect of their natural history. Designing surveys for frogs has no relevance for a</p>	<p>Comments regarding vegetation assessment noted and captured accordingly. The detailed vegetation description of the area was undertaken by Nick Helme and later mapped by David Hoare. Nick Helme, used this map accordingly within his flora report. In terms of vegetation assessment, the report compiled by Nick Helme, as the Flora specialist appointed for Caledon Wind Farm EIA, must be first priority. It must further be mentioned that all the specialist where on site and all their findings and motivations were tested on site. Thus far all indication from land owners are that these specialists were the only ones on site and therefore their recommendations and studies must be viewed in the light of on-site first hand studies and observations.</p> <p>Comment noted. The presence of red data species identified for the site have been done accordingly to geographic distributions, and not so much as according to the presence of natural habitat – thus taking the precautionary approach, that regardless of the vegetation (degraded or not), the species may potentially still occur and has been reported on as such.</p> <p>Mr David Hoare is a registered natural scientist, who specialises in both fauna and flora studies. Mr Hoare, in his fauna specialist report has reported accordingly on all the potential red data fauna species which may possibly occur within</p>

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				<p>taxon that has an aerial and migratory lifestyle, with a likely territory of many kilometres and if their migrational range is considered, this may be more than a thousand km's. There should be a separate section for the consideration of the impacts on bats.</p> <p>Bats It is abundantly clear that no on-site baseline (preconstruction) bat studies and monitoring have been performed. What little mention there is of bats is nothing more than a superficial desktop scoping assessment and cannot be regarded as an environmental assessment, which was a requirement in the DEA letter of acceptance of the FSR.</p> <p>Bats may be affected in different ways – collision, or death by barotrauma, and loss of foraging has been mentioned in the Fauna Report. Additional effects are interruption of commuting routes, which may be a major threat, and the emission of ultrasound by turbines. The migratory routes to and from the De Hoop Reserve are unknown at present, but wind farms may pose significant threats.</p>	<p>the proposed study area, given their geographic distributions. Once the species were identified, he proceeded to then discuss the various impacts which could be expected from the presence of wind turbines and associated infrastructure. The impacts on bats (i.e. collisions and barotraumas) have been described completely separately to the impacts that could affect the potential frog species identified (i.e. loss of wetland habitat, fragmentation of populations).</p> <p>According to the DEA acceptance of the FSR, a report on bats has been provided within David Hoare's fauna specialist report. There unfortunately has been no standard prescriptive methodology or approach undertaken historically on this matter, due to the lack of wind farm technology within South Africa. Mr Hoare has therefore reported on the species likely to be affected and the possible impacts which could affect them. As the wind farm industry develops within the continent, these studies can be developed.</p> <p>The impact of wind turbines on migratory routes, are yet to be determined in South Africa, due to the non-existence of such turbines currently. These impacts will only be fully determined and understood through the monitoring of bat routes, once wind farms become operational. The recommendation to monitor bat movements and mortalities during the operational phase of the wind farm has been included in the Environmental Management Plan (EMP).</p>

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				<p>Surveys should not only be undertaken in the summer to identify local foraging bats, but also in the spring and autumn when bats may be migrating into and out of the Western Cape, to or from their hibernation sites. In view of the agricultural role of bats, all species, not only 'Red Data' species should be considered.</p> <p>The economic benefit of bats to agriculture has been ignored. The impacts could be on the project farms themselves, and neighbouring farms used for foraging.</p> <p>Because of the lack of knowledge about bats in South Africa, the precautionary approach to impact assessment should be adopted.</p> <p>No baseline on-site monitoring has been performed, only speculations based on desk-top studies and therefore this report is nothing more than a scoping study with an unjustified impact assessment; it provides insufficient information for the competent authority to form an opinion and make a decision.</p> <p>The Environmental Management Plan</p>	<p>Comment noted and captured accordingly. An appropriate monitoring system will be designed and implemented under the guidance of a suitably qualified and experience ornithological consultant, starting at least one year prior to the construction of the infrastructure. Based on the results, a policy of adaptive management will be implemented.</p> <p>Comment noted and captured accordingly. Please provide GIBB with additional references in terms of the research into the Economic benefits of bats on Agriculture.</p> <p>Comment noted and captured accordingly. The adaptive management policy mentioned above will be closely followed. Caledon Wind will take the advice of the consultant and implement necessary measures, even if it means the relocation of turbines.</p> <p>Comment noted and captured accordingly. Please see the comment above regarding monitoring.</p> <p>This has been included within the EMP within</p>

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				<p>for the operational phase must include an on-going bat monitoring programme for injuries and mortalities.</p> <p>Why have pre-construction bat monitoring studies not been performed? It is our opinion that authorisation should not be considered until such a studies have taken place, following the methodology outlined in the "South African Good Practice Guidelines for Surveying Bats in Wind Farm Developments 2011. Sowler & Stoffberg, EWT, 2011".</p> <p>Avifauna The scoping reports have relied on desktop data from programmes which were not intended or designed for use in EIAs. Extensive field work will have to be undertaken over an extended period covering all seasons for a proper assessment to be made.</p> <ul style="list-style-type: none"> · The recorded presence of Martial Eagles (SABAP1 & 2), classified as Vulnerable, has not been included in the list of priority species in Table 7.2, although included in the Scoping Report. · The undersigned has observed a Martial Eagle (recorded in SABAP2) on a ridge not far to the NW of the proposed turbine 41 position. 	<p>section 4.2.2 (b).</p> <p>It is recommended that together with pre-construction bird monitoring, that bat monitoring also be done prior to the commencement of construction of the wind farm. Should there be any significant findings in these monitoring programmes, these would need to be addressed before authorisation to proceed with construction is given.</p> <p>Comment noted. Both pre- and post-construction monitoring has been included within the EMP, which will become a condition that the application will have to adhere to.</p> <p>Table 7.2 will be updated accordingly.</p> <p>Comment noted and captured accordingly. This information will be forwarded to the applicant for their records and as it is included in this report is available to the competent authority for their consideration.</p>

Respondent & organisation	Issue / concern*	Date	Means of Communication	Comment / Query	Response
				<ul style="list-style-type: none"> · The area is well known for its perennial high density of the (Vulnerable) Blue Cranes and although there are few available data for South Africa, experience elsewhere with similar species suggests that there could be a significant risk of collision mortality. · The population of Denham's Bustards (Vulnerable), already seriously threatened in the Overberg through power line collisions, may also suffer possibly unsustainable attrition. We agree with CapeNature that the precautionary principle should prevail. · On-site pre-construction surveys of avifaunal activity is mandatory and it is our view that any EIA Report is incomplete without the results of such surveys, and that the competent authority should not consider any reports without those data as the EAP assessments cannot possibly be objective. · Monitoring for injuries and mortality should continue at regular intervals throughout the operational lifetime of the project using the methodology published in the 'EWT-BLSA Best Practice Guidelines for Avian Monitoring and Impact Mitigation at proposed WEF sites in South Africa – Version (Jenkins et al 2011)'. · Monitoring could be hindered by seasonal variations from crop growth cycles, thus hampering access and 	<p>Comment noted and capture accordingly. An assessment on nesting sites of Blue Cranes will be undertaken. Turbines will be constructed on steep slopes, which are usually avoided by Blue Cranes.</p> <p>Your agreement with the CapeNature statement is noted.</p> <p>Comment noted and captured accordingly for authority review and decision-making.</p> <p>An appropriate monitoring system will be designed and implemented under the guidance of a suitably qualified and experience ornithological consultant, starting at least one year prior to the construction of the infrastructure. Based on the results, a policy of adaptive management will be implemented.</p> <p>This will be addressed through the post-construction monitoring programme.</p> <p>Comment noted and captured accordingly.</p>

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				<p>concealing carcasses. (The same applies to Bat monitoring).</p> <ul style="list-style-type: none"> Results of the bird monitoring programmes, pre-construction and during the operational phase, must be placed in the public domain with copies of reports being provided to EWT, DEA, CapeNature, and registered I&APs. <p>Visual Theewaterskloof Municipality has previously given assurance to the DEADP that no wind energy facilities would be allowed in the 2 km buffer zone along the N2 (which has been classified as a scenic route within this area), especially in the area where the road descends the Houw Hoek Pass towards Bot Rivier and Caledon. In addition, it is the stated intention of the municipality that wind energy facilities should not be visible along the N2.</p> <p>Set-backs and negative visual impacts on national and provincial roads, and ridges are described in the Theewaterskloof Regional Site Assessment for Wind Energy Facility Development.</p> <p>The visual impact of this development, in particular the proposed development in Phase 1 along a prominent ridgeline is impossible to mitigate, will be highly negative, and will utterly destroy the scenic attractiveness and sense of</p>	<p>Alternative methods should be proposed by the responsible person appointed to undertake the monitoring and approved by either the avifauna specialist or the Endangered Wildlife Trust.</p> <p>Comment noted and captured accordingly for authority review and decision-making.</p> <p>It has been agreed that this data will be made available to CapeNature to assist in decisions for further developments in the area.</p> <p>Comment noted and captured accordingly for authority review and decision-making. This comment has also been forwarded to the Theewaterskloof Municipality for comment.</p> <p>The section in terms of the Wind Farm Developments within the TWK Draft SDF was scrutinized and the statement of visibility is not stated in it. The TWK Municipality just the Western Cape Environmental Affairs Department's methodology and stated in the SDF that the areas of concerns needs to be addressed within the site specific EIA of each wind farm development.</p> <p>Because of the mast high being the same of each</p>

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				<p>place for visitors, tourists and residents. For this reason alone this development should not be allowed to proceed.</p> <p>Cumulative Impacts We are much concerned about the potentially huge cumulative environmental impacts of this development along with the recently authorized Biotherm project, and what we are now advised are two other large wind farm developments directly abutting on this one. We have sought further details about these new projects from the DEA. See Fig. 24 in the Visual Impact Report.</p> <p>The negative impacts on avitourism resulting from impacts on the visual environment and more particularly the direct and indirect effects on avifauna, in the surrounding areas are of great concern to us, and should be for those concerned with development planning and tourism promotion at all levels of government.</p> <p>Bird watching is an increasingly popular hobby worldwide which has resulted in a rapidly developing avitourism industry with consequent benefits for conservation, job-creation and social upliftment.</p> <p>We reserve the right to amend any of these comments and submit additional</p>	<p>turbine, the development will follow the ridge line and therefore soften the visual impact in terms of hard edges. The restriction on no painting of masts will also help to blend the masts into the background of the area.</p> <p><u>Additional Comment as at 10 August 2012:</u> The EIA found that the visual impact of the project will be highly significant, and that micro-positioning of the turbines will not assist in reducing this impact.</p> <p>Nevertheless, the EIA points out that:</p> <ul style="list-style-type: none"> • It appears that no tourist facilities (except for the views from the top of Swartberg in the Caledon Nature Reserve,) will be directly visually affected, such facilities as the Caledon Spa and Casino being shielded from views of the wind farm; and • The visual impacts are entirely reversible should the wind farm be decommissioned after the initial 20 year lifespan of the turbines. <p>Comment noted and captured accordingly for authority review and decision-making. It is also understood that the WC DEA&DP undertook a study tour to determine a methodology for placement of turbines. The sites are outside critical biodiversity areas and therefore no detail studies were deemed necessary because of the site specific circumstances. The development of the project and site was done in line with the</p>

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				material wherever deemed necessary.	<p>Western Cape Environment Department's methodology whereby and the cumulative impact was addressed in the methodology. The Department advised the location of big wind farm developments (150MW and more) in specific areas, rather than small developments scattered all over the area.</p> <p>All comments noted and responded to where required. GIBB thanks Birdlife Overberg for the valuable contribution to and suggestions for the EIA.</p> <p><u>Additional Comment as at 10 August 2012:</u> The applicant has undertaken (upon consultation with Cape Nature and the Department of Agriculture) not to construct any of the turbines that have been proposed for areas identified as high risk from a biophysical perspective by Mr van Rooyen-the Avifauna specialist. These include the following turbines: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72. The applicant has also agreed to remove turbines T17 and T20 as these were the only turbines that remained on Rensoterveld.</p> <p>Please also note that the applicant has appointed experts for both bird and bat monitoring, subject to being granted environmental authorisation. The applicant expects that it will be possible to gather a minimum of a year's data prior to construction, as required by the recommended mitigation in the Guidelines. The applicant has committed to working with</p>

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					<p>the appointed specialist avifauna consultants and CapeNature Conservation to resolve any problems that are identified as a result of the monitoring in relation to the approved turbine positions.</p> <p>Lastly please note that a lease agreement has been negotiated between the land owners and Caledon Wind. In the event of successful authorisation of the project, this agreement will be implemented. The lease encompasses all of the land in the study area, which is approximately 2 700 ha in extent. Caledon Wind would therefore be the responsible party to enter into a Stewardship agreement with CapeNature Conservation.</p> <p>As part of the Stewardship Agreement Caledon Wind has agreed to make available to CapeNature Conservation as much of the Renosterveld under their control as is required provided that its bid under the Independent Power Producers process is successful. This is confirmed in the attached letter from the company's director. The ground truthing prepared for the EIA has shown that there are approximately 300 ha of untransformed Renosterveld within the lease area. The period of this commitment will be for the full term of the agreement with the Department of Energy, which in terms of the Independent Power Producer's RFP is for 20</p>

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					years, extendable by agreement with the Department of Energy.
19) Brian McMahon Greyton Resident	Comments on Draft EIA Report	01 Jan 2012		<p>SUMMARY</p> <p>(1) The main conclusion drawn in this DEIR seems to be that, although some of the Negative Impacts are unacceptably High or Medium-High, implementation of the recommended mitigation will reduce these ratings and they can then be outweighed by High Positive impacts. However, it is evident that the main mitigation measures either have not been agreed by the Applicant (and maybe will never be applied) or have not been substantiated:-</p> <p><input type="checkbox"/> There is no Memorandum of Understanding covering a Stewardship agreement with Cape Nature, so the Negative Flora impacts must still be considered unacceptably Medium-High.</p> <p><input type="checkbox"/> All the turbine and access roads'</p>	<p>It must be re-iterated that all mitigation measures included in the Environmental Management Plan (EMP) and finally approved by the Department of Environmental Affairs (DEA) will become legally binding for the applicant to adhere to. Furthermore, during the decision-making process, the DEA may further stipulate any additional conditions they feel should be included within the EMP. If some of the proposed specialist mitigation measures are not enforced, then the significance before mitigation stands correct, however if they are then the significance after mitigation stands true.</p> <p>CaledonWind has indicated their willingness to enter into the Memorandum of Understanding (MoU), and this has been strongly recommended for the DEA decision-making. As above, if this is not undertaken, then significance before implementation stands correct.</p>

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				<p>positions recommended by the specialists have not been adopted by the Applicant.</p> <p><input type="checkbox"/><input type="checkbox"/> Specifically the turbines in Phase 1 have not been removed from the main ridge, which is a primary cause of the High Visual impact.</p> <p><input type="checkbox"/><input type="checkbox"/> In the absence of a real Positive impact on local employment, the potentially significant impact from local benefits over 20 years or so from Community Trust share dividends has not yet been validated.</p> <p>In these circumstances, it is considered that the initial High or Medium-High Negative assessment significance, with no mitigation, should stand.</p> <p>(2) Although there are statements from specialists confirming no adverse changes to impact assessments done on the preliminary site layout, when compared to later layouts, these have to be questioned as there is a lot of confusion concerning the boundaries of the site and the actual final positions of turbines and infrastructure.</p> <p>(3) The quality and presentation of the site layout drawings is far from satisfactory in that the topographic and</p>	<p>Consideration has been given to all specialist recommendations and where positions could be changed they have and where not, specific mitigation measures as far as possible have been included by the specialists to address impacts associated.</p> <p>The high visual impact of the turbines placed on the main ridge has been captured and reported on accordingly for authority review and decision-making.</p> <p>Comment noted. The detail of the proposed Community Trust, has been discussed within the Social Impact Assessment, and forms part of the larger submission to the Department of Energy, which is validated and approved by the World Bank before this can be submitted.</p> <p>As discussed previously, if mitigation measures are not included in the EMP, then this statement stands correct.</p> <p>In light of a previous comment received from yourself, GIBB has corrected, updated and produced a new set of high definition, relatable maps, showing the final correct site boundary and turbine layout. All outdated maps within the EIA report have been replaced with these maps accordingly for decision-making.</p> <p>GIBB trusts that the corrected and updated high</p>

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				<p>environmental constraints are not clearly relatable to turbine and infrastructure positions. This clearly adds to the problem defined in (2) above and may influence the validity of the decision making process.</p> <p>(4) Contrary to statements in the DEIR, this proposal is not aligned with local and provincial guidelines in many respects:-</p> <ul style="list-style-type: none"> <input type="checkbox"/>Phase 1 is a development along, and too close to, a dominant ridge line. <input type="checkbox"/>There is no separation between this site and 3 other adjacent possible sites, and part of the already approved Dassiesfontein site is only about 2 km away. <input type="checkbox"/>Buffer distances required between turbines and roads, scenic routes, water bodies etc. are not consistent with the recommended guidelines <p>5) Claims that this application complies with local Municipality policies as expressed in the IDP and SDF are</p>	<p>definition map should resolve any further queries with regards to the final turbine positions and layouts.</p> <p>Comment noted and captured accordingly for authority review and decision-making. Many local and provincial guideline documents were compiled prior to the establishment of the wind industry within South Africa. The applicant has however ensured adherence to legislated items, such as the Land Use Planning Ordinance (LUPO) stipulated distance of 1.5 times tip height distance from farm boundaries. The distinction between guidelines and regulations must be taken into account. Guidelines are only guidelines. The regulations as in terms of the Land Use Planning Ordinance of 1985 (Ordinance 15 of 1985) prescribe the distances and other regulations that needs to be adhered to. In terms of these regulations CaledonWind adheres to them all. Further, the Western Cape Department of Environmental Affairs methodology states that big Wind Farms are more desirable than a lot of smaller wind farms scattered all over the countryside. The definition in terms of big wind farms is determined in the sense of an area where wind farms can be erected, thus not limiting the number of wind farms or the turbines or the distances between individual wind farms.</p> <p>The claims are substantiated in terms of the TWK 2030 Vision document and associated public</p>

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				<p>exaggerated. Further, there has been no public participation or consultation concerning Wind Farms in the Overberg, for either the IDP or SDF.</p> <p>(6) The DEA, in their letter of acceptance of the FSR, ask that all comments from all relevant Authorities are submitted with the final EIA including those from Dept. of Agriculture and Eskom. They also request that certain specific issues are considered and addressed – a large proportion of which is still not included in the DEIR.</p> <p>(7) The impact assessments of Bats and Transportation (Traffic) are considered to be inadequate; there are significant shortcomings and omissions in those for Avifauna, Social, Visual and Noise.</p> <p>(8) The EMP does not give sufficient details, especially of baseline surveys and monitoring programmes for Avifauna and Bats, and it contains many contradictions and omissions.</p> <p>SITE AREA</p> <p>The Final Proposed Caledon Wind Farm Layout is shown in Figure 17.1 of the DEIR. However, farm portion 3/263 (narrow strip in central north area) is not included, but appears on other main maps, and 64 turbines are shown</p>	<p>participation process that was followed. The 2030 Vision document was and is a public guidance document that was drafted by the community with the support of the local authority and forms part of the IDP and SDF, as well as the LED strategy, of the local council. The matter of public consultation undertaken for the IDP or SDF cannot be addressed as part of this EIA process.</p> <p>As per the DEAs letter of acceptance of the FSR, comments from relevant authorities will be submitted with the Final EIA Report, which will be made available electronically for I&APs to view. GIBB has further endeavoured to meet all other requirements as stipulated in the Acceptance of FSR throughout the report and are addressed accordingly in the relevant section below.</p> <p>Comment noted and addressed accordingly in the sections below.</p> <p>Comment noted and addressed accordingly in the sections below.</p> <p>Portion 3/263 was quite correctly overlooked from the final layout diagram presented in Figure 17.1. This diagram has been corrected to include this portion of land. Figure 17.1 shows 67 turbines, however GIBB is aware that the image itself was of low quality and has reproduced the final layout</p>

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				<p>instead of 71 in the text.</p> <p>Figure 1.3 in the DEIR, titled '<i>Proposed positioning of the turbines</i>', which does include this portion 3/263, also includes farm portion 1/264 to the north western end of the site, which includes 2 turbines apparently outside the site area (No's 18 & 37), and another portion due South of farm 4/264, which also has an extra turbine (No 21) outside the 'apparent site area'</p> <p>.</p> <p>A total of 74 turbines are shown. Portion 1/264 is also shown as part of an adjacent possible energy facility in Figure 24 of the Visual study (Appendix P of the DEIR) – although no such map occurs in the main DEIR report itself.</p> <p>The Avifauna report (figure 2) shows all 74 turbines on the enlarged site, whereas the Noise report shows only 63 turbines.</p> <p>A letter attached to the Flora report shows 2 maps with a total of 67 turbines.</p>	<p>diagram as a high definition map, including the correct site boundary, as discussed above. The 67 turbines and their final positions should be easier to identify in the new set of maps.</p> <p>Figure 1.3 was the original proposed layout of the Caledon Wind Farm, however during the course of the project underwent some modifications. During the EIA process portions 1/264 and 4/264 were removed from the study area and turbines located in those portions ultimately also removed. The final project description is that as described in writing in the report. In order to resolve the conflict as noted by yourself, Figure 1.3 has been replaced with the corrected and updated map as discussed above.</p> <p>The map provided in Figure 24 of the Visual Report reflects the correct boundaries of the Caledon Site. As discussed, portions 1/264 and 4/624 have been removed from the study area. The map included in the visual report was not included within the main report as it has since become outdated and GIBB is not in possession of the latest windfarm information as this is changing constantly. It remains in the visual report as it has been referenced and used to support a general argument.</p> <p>Both the avifauna and noise reports have correctly reported on the project description of 71 turbines, as well as on the final layout (67 turbines) as submitted and commented on in the conclusions chapter.</p>

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				<p>The Heritage report (HIA) is based on 70 turbines although only 17 turbines are shown. Only the original designated 1400 ha, rather than the revised 3500 ha, were comprehensively surveyed.</p> <p>Figure 4 of the DEIR Flora report shows a vegetation and land use map, the same as figure 7.10 of the main DEIR, which was supplied by D Hoare but re-issued as an Arcus Gibb map. However, Hoare's Fauna report, Appendix I of the DEIR, contains a similar map which shows 2 extra portions in the northwest area.</p> <p>At best, this represents shoddy workmanship. At worst, the range of conflicting information makes it impossible to quantify the severity of the constraints and the environmental impacts, and to assess the potential results of the mitigating measures proposed.</p> <p><i>A summary of this confused information was sent to the EAP on 5 December 2011 by Email, which was acknowledged, but no response was forthcoming.</i></p> <p>MAPS</p>	<p>Section 1.3 – Methodology of the Heritage Report indicates to the contrary that 95% of the site was accessed, the remaining areas being those that they could not physically reach.</p> <p>Figure 2 of the heritage report shows the site layout, turbine locations and access roads and cable routes which were used when undertaking their site visit.</p> <p>At the time of undertaking the detailed flora mapping exercise, the additional portions were still being considered by Caledon Wind and was produced in the map created by David Hoare (due to the unavailability of Nick Helme to do the survey). GIBB proceeded to use this mapping data to reproduce the relatable maps included in Appendix S of the DEIR, which was also provided to Nick Helme, after the site boundary had been confirmed.</p> <p>GIBB trusts that the corrected and updated high definition map should resolve any further queries with regards to the final turbine positions and layouts.</p> <p>Responses to all DEIR Issues and Reponses received were provided before submission of the Final EIR to the DEA for decision-making</p>

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				<p>There is a series of high definition maps in Appendix S, with quality enough to differentiate the main features and constraints, which show all 74 turbines. As discussed above, the site area needs to be confirmed and the turbine positions (preferably when re-assessed after any re-positioning) accurately shown with all the infrastructure, including all Alternatives.</p> <p>Every map should have a unique reference, the date it was compiled, all revisions dated, scale bar, legends for all features with obvious colour variants.</p> <p>Figure 3 shows the vegetation, which should not be classified as "degraded" or "moderate condition" etc. unless there are very clear definitions of the exact meaning of these words in terms of the degree of damage and capacity for restoration. Vegetation on all adjoining properties (as Figure 8) should also be included, especially where turbines and infrastructure abut the boundary.</p> <p>All turbines (separately numbered) and all associated infrastructure need to be shown on one map, or as layers, in relation to vegetation, topographic features such as ridges, wetlands and water bodies. The infrastructure layout in Figure 6 can only be evaluated together with the Endangered</p>	<p>. GIBB trusts that the corrected and updated high definition map should resolve any further queries with regards to the final turbine positions and layouts.</p>

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				<p>vegetation shown in Figure 3. All the layout areas should be clearly visible – they do not exist on the published maps.</p> <p>Unless the DEA has been provided with maps and or layers of different quality, with different content, it is evident that their own guideline for Wind Farms has not been adhered to sufficiently, to permit a proper and full assessment of the impacts on this application.</p> <p>ALTERNATIVES</p> <p>Although stressed as an important part of the EIA process, the investigation of Alternative sites, turbine sizes and layouts of turbines and their connection etc. has not been adequately reported. Even though two other sites were rejected because of wind quality, it cannot be inferred that the selected site is the only one suitable – there are numerous other Wind Farm applications in the Western Cape. The NEMA Regulations stipulate that all reasonable and viable Alternatives are required to be identified, assessed and compared, in terms of social, biophysical, economic and technical factors.</p> <p>Figure 4.2 of the DEIR shows a substation and 2 'power corridors', neither of which seems to relate to the final position of the transmission power</p>	<p>Comments noted and captured accordingly. Alternatives considered for the project have been included within the DEIR and included layout alternatives based on specialist comments and recommendations. In terms of site alternatives, the applicant considers the site feasible. The applicant is also limited to sites available to them, of which they proceeded with the most feasible.</p>

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				<p>lines. Sections 4.3.2 and 4.4.1 state that wind conditions, topography and access to suitable land and transmission line, defined the optimum mix and layout of the turbines, which therefore determined positions of access roads and cable routes.</p> <p>In fact, there is no real evaluation of alternatives and no comparative performance figures are offered, for example to assess the impact of moving turbines to supposedly less financially viable positions with more environmental compatibility.</p> <p>GUIDELINES</p> <p>The Western Cape Guideline on Wind Farm site selection, although not mandatory, is 'recommended' by DEA, and therefore needs <i>to be taken into account</i>. In this DEIR, many of the important guideline criteria have been ignored. In particular, buffer zones are arbitrarily used, when convenient, whereas they should be considered mandatory minimums unless motivated with adequate reasons:-</p>	<p>Alternative sites where investigated before the submission of this application, but other interrelated conditions made them undesirable, like the locations of Greyton Commonage, Caledon Nature Gardens and Velapi near Botrivier –conditions such as distribution lines not available and would have had a detrimental effect if more power lines where to be erected and or the sensitive environ in which such development would have been constructed.</p> <p>The comments on guidelines have been noted and captured accordingly. The distinction between guidelines and regulations must be taken into account. Guidelines are only guidelines. The regulations as in terms of the Land Use Planning Ordinance of 1985 (Ordinance 15 of 1985) prescribe the distances and other regulations that needs to be adhered to. In terms of these regulations CaledonWind adheres to them all. Further, the Western Cape Department of Environmental Affairs methodology states that big Wind Farms are more desirable than a lot of smaller wind farms scattered all over the</p>

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					Guideline	This Site	<p>countryside. The definition in terms of big wind farms is determined in the sense of an area where wind farms can be erected, thus not limiting the number of wind farms or the turbines or the distances between individual wind farms.</p> <p>These dams only service as drinking holes if and when water is available. None of these dams hold water permanently and therefore birds will not stay in the area because of the water's availability. Temporary sheep drinking water is more being used by the birds than these dams that are empty for more than 7 months of the year. Therefore the relocation of some turbines is not deemed necessary.</p> <p>All the documents produced and mentioned,</p>
				Separation between wind farms	30-50km	zero	
				Local tourism route buffer zone	2.5km	0.4km	
				National roads (N2)	3km	1.5km	
				Provincial tourist route, such as R27 & Nr Botrivier to Caledon	4km	0.4km	
				Other local routes	500m	400m	
				Local wetlands, rivers	500m	400m	
				Bird habitats and flight paths	1000m	400m	
				Distance from ridge lines	500m	160m	
				The DEA's own recommendation for residential areas and homesteads	1000m	250m	
				<p>Fourteen (14) of the 250m bird zone buffers around dams in Figure 7 of Appendix S contain turbines that the Avifauna study proposed should be relocated.</p>			

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				<p>In terms of the Western Cape Regional Methodology for Wind Energy Site Selection (2006), PSDF (2009), Guidelines for Development on Mountains, Hills and Ridges (2002) and the TWK Municipality Wind Energy Regional Assessment (2010), the findings of the SIA indicate that the proposed WEF is in conflict with a number of location based principles. These relate to development on mountains, specifically the crest of hills and dominant ridges, preference for disturbed landscapes and the preservation of existing visual and sense of place values.</p> <p>HERITAGE ISSUES</p> <p>In the DEADP Guidelines for involving heritage specialists in the EIA process, it is commented (see Heritage Report section 1.4.2) that the visual intrusion of development on a scenic route should be considered a heritage issue.</p> <p>The Heritage study reports that the impact of the new transmission lines leading to the substation in the western section of the study area are not considered significant, as they will not be visible from the R43. However, part of the power line will follow the gravel road in the NW area of the site, where they will be very visible. Conclusions of</p>	<p>states that site specific EIA's and studies must be undertaken, because of the big scale data being used to produce these studies and guidelines. Most of the issues being referred to have been founded as insignificant or the mitigation measures proposed would be sufficient to address the outstanding issue.</p> <p>Comments on heritage issues have been noted and captured accordingly. Please see additional comments at the end of this submission.</p>

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				<p>the report include:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> Size of the turbines precludes proposing a feasible buffer on either side of the scenic R43. No mitigation is possible. <input type="checkbox"/> The impact of the turbines on the cultural landscape will be very high, with no mitigation possible. <input type="checkbox"/> The cumulative impact of four adjoining Wind Farms in the Caledon area will be High. <p>This EIA demonstrates no real attempt to avoid, minimise or remedy the disturbance of landscape and ecosystems and loss of biological diversity that constitute part of the nation's heritage.</p> <p>There is no report of any comment from Heritage Western Cape, which is understood to be a requirement of the EIA process.</p> <p>VISUAL IMPACTS</p> <p>The visual environment and sense of place have been generally well described in section 3.2 of the specialist study and totally support the High Significance of this impact assessment, which is irrespective of any mitigation that could be considered. Nevertheless, 2 particular impacts have been</p>	<p>Comments on visual impacts have been noted and captured accordingly. Please see additional comments at the end of this submission.</p> <p>The location of the new overhead connection distribution line and substation will not be visible</p>

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				<p>understated:-</p> <p>□□The single view from the lower part of Houw Hoek Pass only indicates the position of the wind Farm as seen through the rear mirror of a vehicle travelling East to West. The pass is the 'gateway' to the Overberg for local residents, tourists specifically visiting the area and traffic to the East and as such, the first views of the Overberg are very important.</p> <p>□□Visual impacts from the near proximity of the new overhead power line, substation and turbines along the Hawston View road, which connects the R43 to the Villiersdorp- Grabouw to Botriver road, are totally ignored.</p> <p>The statement is made that the visual impact should strongly influence the decision as to whether or not to authorise the implementation of the project.</p> <p>However, the author then proceeds to try and counterbalance the above argument with various comments and opinions:-</p> <p>□□Placement of these large turbines, especially those along the high central ridge in phase 1, may well be considered very good for operational efficiency, but other potential sites have already been selected, and will continue</p>	<p>from Houw hoek Pass, because of the location and the nature of the slope where it will be located. The gradient of the area made it possible to "hide" the location of such and therefore the proposed location of such infrastructure.</p>

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				<p>to be selected, that are equally financially and technically viable without the extent of this visual impact. Indeed, one can assume that the other turbines on this site are viable, most of them not having such a dramatic visual impact.</p> <p>□□The visual impact on viewers in the mountain areas is underestimated, taking into account the possible growth in tourism during the next 20 years or more – especially the development of hiking and biking tours and events centred specifically in the Overberg.</p> <p>□□The theoretical reversibility of the impact because of the possible decommissioning of the facility in maybe 20, possibly 40, years or longer is valid, except that it should not be assumed to be likely. Wherever natural vegetation is built over with foundations, access roads, trenches or hard standings there will be significant local permanent loss – this cannot be easily reversed. <i>Full details are required of the establishment and running of the proposed Environmental Rehabilitation Fund (proposed in the Social Economic Report, and briefly discussed in the main DEIR), together with the procedure to carry out this work.</i></p> <p>□□Perception of the high significance of the visual impact as Positive for some persons, because they get used to such an eyesore, or when curious tourists are attracted by the 'green energy' aspect, but the reality for the majority is that</p>	

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				<p>the visual impact is Negative.</p> <p><input type="checkbox"/> <input type="checkbox"/> It must be beyond belief that national and international tourists in significant numbers will spend large sums of money to travel to the Cape to view a selection of Wind Farms. The motivation for those who imply this possibility should be questioned.</p> <p><input type="checkbox"/> <input type="checkbox"/> It is suggested in the Conclusions of the Visual report that no tourist facilities, other than the Caledon Nature Reserve, will be directly affected by the visual impact – this is nonsense. The visual influence of the Helderstroom Road, for the first 5 km, was assessed as High Negative – places like Rouxwil Guest Farm will be at risk. Only in the last year or so have Theewaterskloof Municipality's growth and stability prospects been linked to an active tourism policy for the region. Hiking and biking have already been mentioned. More and more farms are providing tourism facilities. Wind Farms, contrary to some assertions, are not compatible with the hills and mountains of the Overberg.</p> <p><input type="checkbox"/> <input type="checkbox"/> The cumulative impact significance is said to be unaffected if the other potential Wind Farms are considered, because the overall viewshed, already very large, will not be increased although the intensity of the impact will be higher. This 'opinion' is made with the absence of any details of turbine layout and numbers for the potential</p>	

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				<p>FLORA IMPACT</p> <p>The specialist report concludes that:-</p> <ul style="list-style-type: none"> □□A significant amount of the study area of 3500 ha comprises High Sensitivity vegetation areas of conservation value – further loss should not be tolerated. □□Development in these areas is not recommended as it will result in permanent loss of some vegetation and maybe also of Species of Conservation concern. □□Impacts cannot be effectively mitigated. □□The proposed Wind Farm is likely to have an unacceptable Medium-High impact. <p>The main mitigation measures relate to the relocation of 5 turbines and revision of some access roads, and also a Stewardship program with the landowners to formally conserve and manage most of the remaining High Sensitivity vegetation areas. In the February 2010 entry in the Issues Report, the EAP has recorded a plan to follow up during the specialist studies. It was concluded in the DEIR that the likelihood of any progress is low.</p> <p>A formal Memorandum of Understanding between all the parties concerned is understood to be a</p>	<p>their willingness to enter into the Memorandum of Understanding (MoU), and this has been strongly recommended for the DEA decision making. Caledon Wind has agreed to make available to CapeNature Conservation as much of the Renosterveld under their control as is required.</p> <p>As above, if this is not undertaken, then significance before implementation stands correct.</p>

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				<p>condition prior to such a mitigation measure being accepted by DEA as relevant. Without it, the assessed impact remains as "unacceptable Medium-High Negative significance".</p> <p>AVIFAUNA IMPACTS</p> <p>The requirements for the specialist study were laid down in the Scoping Report and confirmed in the TOR. DEA accepted the FSR and Plan of Study, and in fact listed a number of additional issues that <i>required to be considered and addressed in the EIA</i> – no exemptions were stated.</p> <p>The specific subjects for the avifauna study were:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> Disturbance of breeding birds during construction. <input type="checkbox"/> <input type="checkbox"/> Sterilisation of breeding and foraging habitats during operation. <input type="checkbox"/> <input type="checkbox"/> Collisions with power lines. <input type="checkbox"/> <input type="checkbox"/> Collisions with turbine blades. <input type="checkbox"/> <input type="checkbox"/> Mapping of bird sensitive areas. <input type="checkbox"/> <input type="checkbox"/> Assessment of potential impacts on birds. <input type="checkbox"/> <input type="checkbox"/> Proposal of mitigation measures. <p>Slopes for soaring birds were identified, in particular the main ridge about 160m from turbines 1-13, but no survey done to confirm their actual use. The collision risk for soaring species using this ridge</p>	<p>Comments on avifauna impacts have been noted and captured accordingly. The requirements as stipulated by the DEA have been addressed accordingly within the avifauna specialist report.</p> <p>The slopes identified have been mapped accordingly as high risk / bird sensitive areas from an avifaunal perspective and the turbines identified as posing a direct threat have been noted and reported on accordingly. The same approach was adopted for water sources and dams. Mr van Rooyen has reported on the species likely to be affected and the possible impacts which could affect them. Without determining the actual presence, this adopts a more precautionary approach to assume that any of the 54 species could potentially occur within the study area, and the impacts could apply accordingly.</p> <p>The significance rating is calculated using the formula provided within Chapter 6 of the DEIR. Chris van Rooyen has indicated a result of low significance, but rightfully notes uncertainty with particular parameters due to the lack of South African precedents. The certainty will only increase once wind farms are established in</p>

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				<p>was said to be 'marginal' – no reasons given.</p> <p>Water sources and dams have been identified and mapped, but no survey done of their usage. Actual flight paths in particular of Blue Cranes have not been determined. There is no confirmation of the actual presence of some or all 54 potential priority birds on the site, nor their quantities. There is also no assessment of the existence in the area of threatened species on the Red Data list.</p> <p>Considering in particular the high density of Blue Cranes in the area, the history of collisions with power lines, their estimated mortality in the Overberg of 10% per annum leading to the possible unsustainability of the local population, it is regretted that more work could not be done before attempting any impact assessment. There has to be considerable doubt when an impact is rated of low significance with a low confidence level. In fact one could consider such an assessment as not precautionary and maybe invalid.</p> <p>The designation of the Overberg Wheatbelt as an IBA, even though the site is marginally outside the formal border, should be taken into</p>	<p>South Africa and the effects recorded.</p> <p>This has been noted accordingly within the DEIR.</p> <p>It must be re-iterated that there will be a lag period of approximately 12 months between obtaining authorisation and the commencement of construction of the proposed wind turbines. The EMP has specifically included a preconstruction bird monitoring programme, which will become legally binding and the results thereof to made available to the relevant authorities for review and identification of any risks prior to the commencement of construction. Legally, the pre-construction monitoring will need to be considered and approved before construction can proceed.</p> <p>The guidelines in question were still being developed during the undertaking of the EIA process for the Caledon Wind Farm, which Chris van Rooyen also attended various meetings and seminars on the topic. The report has left the details of the monitoring programme open for design and implementation by suitably qualified ornithological consultants, in which case, this could be those EWT-BLSA guidelines, once approved and accepted.</p>

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				<p>consideration as the habitats are similar.</p> <p>The expectations that Wind Farm operators will contemplate delaying their construction operations to avoid bird breeding periods, or relocating any installed turbines away from bird flight paths, are probably misplaced. This should give even more justification for carrying out impact assessments that are based on reasoned survey conclusions rather than conjecture – prior to DEA decision making.</p> <p>Surveying and monitoring protocol is not defined in any detail, nor is there any reference to the current EWT Guidance document, based on the EWT-BLSA “Best Practice Guidelines for Avian Monitoring and Impact Mitigation at proposed wind energy development sites in southern Africa” (see references list). The unreasonable and unexplained omission of such a reference should be questioned.</p> <p>IMPACTS ON BATS</p> <p>Although the Plan of Study for the EIA recommends detailed field studies to identify which bat species occur in the vicinity of the site and their habitats, there appears to be no record of a site visit by a specialist with suitable equipment for carrying this out. There is</p>	<p>According to the DEA acceptance of the FSR, a report on bats has been provided within David Hoare’s fauna specialist report. There unfortunately has been no standard prescriptive methodology or approach undertaken historically on this matter, due to the lack of wind farm technology within South Africa. Mr Hoare has therefore reported on the species likely to be affected and the possible impacts which could affect them. As the wind farm industry develops within the continent, these studies can be developed.</p> <p>The recommendation to monitor bat movements and mortalities during the operational phase of the wind farm has been included in the Environmental Management Plan (EMP).</p>

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				<p>discussion on potential bat species that might or might not be found on the site, or which might migrate through the area. There is discussion on potential impacts, primarily mortality associated with operating turbines, where an impact rating of Medium Negative is assessed – no level of confidence is offered. It is stated that "<i>Proposed mitigation measures, in the form of an environmental monitoring programme, could reduce the significance of this impact to low</i>" – no explanation is put forward as to just what this might mean.</p> <p>It is considered that the specialist study on bats should have been done as a separate subject, and should include resident and migratory information, as was requested by DEA on their acceptance of the Scoping report. There is nothing of substantive value in this report.</p> <p>The brief mentions of bats in the EMP include reference to pre-construction monitoring, with no details given.</p> <p>NOISE IMPACT</p> <p>It is understood that the well-known low frequency rhythmic 'whooshing' noise as each turbine blade passes close to the tower, can create problems for some people. At the lower wind speeds that are still operationally viable, the</p>	<p>Comments on noise impacts have been noted and captured accordingly. The potential noise impacts are directly related to the type of turbine used and have been modelled accordingly using the turbine specifications, and where noise intrusions were identified these have been reported accordingly and necessary turbine relocations applied accordingly, as discussed in</p>

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				<p>wind noise will mask the turbine noise to an extent that varies depending on topography, wind direction, presence of trees and buildings etc. However, at a particular noise receptor, the wind noise at the receptor may be lower than near the turbine and the whooshing noise may not have attenuated sufficiently to be masked. At night in a rural area, this scenario could create a significant problem, especially if the overall background noise is about 35 dBA (day time) or 25 dBA (night time) and the receptor is trying to sleep.</p> <p>It is suggested that further evaluation is necessary, if only to be assured that there is no problem, in particular as there are residential properties as close as 400- 500m from the nearest turbines, and as the DEA 'Guideline for Wind Farms' proposes 1000m. Non-compliance should be required to be motivated properly.</p> <p>AGRICULTURAL LAND USE</p> <p>Changes in farming practice such as different crop cycles and animal grazing may be significant over the project life of 25 years or more. Sustainable agriculture may be forced to change as a result of social developments and/or weather changes. There is already the unresolved problem with the</p>	<p>Chapter 17 of the DEIR. Comment regarding guideline of 1000m noted and captured accordingly for authority review and decision-making</p> <p>According to the modelled data, no residential properties within the study area will be affected significantly by the proposed wind turbines, in terms of the South African National Standards (SANS) for noise increases. Further to these mitigations it needs to be considered that the turbines will be erected in an area where few people live and is not next to populated area, thus minimizing the noise level even further.</p> <p>There is only 1 substation (divided in two parts on site). This is just before the power is fed into the grid. The other substations are mere box type transformers placed next to a turbine. Overhead lines will go over a portion of natural vegetation and that will become a property of Eskom and is done accordingly to their (Eskom's) specifications.</p> <p>Comments on agricultural land use have been noted and captured accordingly. Please see additional comments at the end of this submission.</p>

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				<p>compatibility of controlled fires required to re-juvenate old fynbos and safety of the turbines and infrastructure, especially if the CapeNature Stewardship programme is actioned.</p> <p>POWER LINES</p> <p>There are contradictory statements concerning the location of substations for the different phases of construction. Routing of the new overhead power line from the only substation shown on the maps (near turbines 20 and 23) seems to cover a significant amount of High Sensitivity vegetation and follows part of the gravel road in the West and SW of the site. There is no description of the routing, no statement of the impacts on flora and the loss of vegetation resulting from access requirements (only part is along the road – this also has not been assessed for visual impact). Length of the line is about 7 km. Throughout the DEIR there are conflicting references to 2 options for substations for each construction phase – only the one is shown.</p> <p>The major issue of connectivity to Houw Hoek Substation is unresolved, not least because of the possibility of several more Wind Farms requiring connection which may cause the substation and transmission line to have to be upgraded. Eskom's comment is still</p>	<p>Both the proposed new substation and powerline alternatives were provided to the specialist as part of the full study area for consideration in their specialist reports. Both the substation and powerline corridors occur within the boundaries of the proposed study area and have been considered accordingly.</p> <p>Connectivity to Houwhoek Substation will be through the existing overhead line, to which the windfarm will tie-in by the proposed new substation. No direct connection or other overhead power lines will be required to the Houw Hoek Substation. Eskom has indicated that there is enough capacity and given the construction of the proposed new substation, that Houwhoek substation will not be required to be upgraded, and this component was removed from the report accordingly.</p>

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				<p>awaited.</p> <p>LOCAL EMPLOYMENT The information given in the SIA is not convincing, at least partly because the Applicant was not able to provide any information on labour costs. A number of 74 persons was estimated for the construction phase, spread over 4-5 years, made up from 32 skilled and semiskilled, and 42 labourers and security. No comment was made as to how many of these jobs were part-time. National or regional subcontracts were anticipated, presumably to include all materials supplies and specialist supplies and services. It was clear that the only expectations for local employment and business were limited to accommodation, catering, cleaning, security and transport.</p> <p>Training is discussed but only in terms of general intention – the education and training facilities at Worcester and Caledon are not mentioned. There is also no discussion about the supply of the special purpose vehicles required for transporting and assembling the turbines.</p> <p>The impact was assessed as Low Positive improved by mitigation measures to Medium. This is considered very contentious considering the stated low expectations for a few</p>	<p>Notwithstanding the skills shortage, the Renewable Energy Bidding process strictly controls and enforces local economic development targets, including local job creation to which the Applicant is bound in order to receive an Independent Power Producer's licence. This includes a significantly higher score for any persons employed from the direct vicinity <50km from the development. As the Applicant will be employing specialist local Civil and Electrical Contractors, the contractual working relationship mix can not be guaranteed at this stage.</p> <p>The mentioned education and training centres do not provide training in terms of the construction, maintenance or running of such a development project. The supply of special purpose vehicles are part of a subcontract and their transportation were included in the Transport Study.</p> <p>The long term jobs will be generated because and due to the involvement of the TWK Community Trust. A development of 24 months will have little</p>

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				<p>short term jobs.</p> <p>The employment prospects for the operational phase are said to be 10-12 persons full-time, all of which require certain skill levels, and again there is general discussion around training. The SIA also contains an Appendix C, maybe intended to be a contribution to the EMP, which promotes policies related to a potential full-time jobs estimate of 30 persons – <i>very significantly different</i>.</p> <p>However, even if a proportion of these jobs was obtained by locals, this is not considered sufficient to justify an impact assessment of High Positive. It would have been better possibly to separate out the far more significant job creation possibilities that could arise from the Community Trust; this would permit the higher impact rating.</p> <p>The Community Trust sounds an excellent vehicle for social funding, but a number of queries arise</p> <ul style="list-style-type: none"> • What is the financial or other benefit to the Operator/Owner from such a scheme? <input type="checkbox"/> <input type="checkbox"/> Has the scheme been fully approved by the various Authorities, including the Treasury? <input type="checkbox"/> <input type="checkbox"/> What is the expected operating profit per installed MW? <input type="checkbox"/> <input type="checkbox"/> What is the basis for the calculation 	<p>job creation on the long term on its own, therefore the formation of the community trust and its functions.</p> <p>The involvement of the Development Bank of South Africa and their legal team, plus the supporting role the local authority plays, gives the assurance than the involvement of the TWK Community is legal and will comply with all required legal terms. Financials cannot and will not be made known at this stage, because the of the bit that the Applicant still needs to be submit to the DOE as well as that it may raise expectations within the TWK Community. The financials will be scrutinised as part of the Bid process and is not part of the EIA process.</p> <p>The legal construction of the trust, the management, distribution to beneficiaries and , dividend structure as paid to the Trust is managed in depth by the Renewable Energy Independent Power Producer's Bidding process. As this is a competitive bidding process, details are confidential.</p>

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				<p>of the dividend by the facility Operators?</p> <p><input type="checkbox"/> Who are the beneficiaries of the balance of 80% of total dividend?</p> <p><input type="checkbox"/> Is the dividend payable after 5 years of <i>full</i> operation (11-12 years after project go-ahead)?</p> <p><input type="checkbox"/> What happens to this dividend during the first 5 years of operation?</p> <p>The very reasonable request to the EAP for a <i>legible</i> copy of Annexure D of the SIA (financial forecasts for the scheme) has not been responded to.</p> <p>The following requirements need to be met prior to authorisation of this project:</p> <p><input type="checkbox"/> An independent financial assessment of the scheme.</p> <p><input type="checkbox"/> Government approval.</p> <p><input type="checkbox"/> Community representation for the allocation of funds to infrastructure and social projects of TWK, beyond the usual minimal IDP consultation process.</p> <p>LOCAL AND PROVINCIAL POLICIES</p> <p>Involvement of TWK Municipality with potential Wind Farms in the Overberg area is reported as proactive and supportive. However, the 2 main sources which should discuss and validate these views and consequential policies are particularly devoid of relevant details. The IDPs of 2010 and</p>	<p><input type="checkbox"/> This is done by the DBSA (Development Bank of South Africa).</p> <p><input type="checkbox"/> DBSA is part of Government.</p> <p><input type="checkbox"/> It is put to the TWK Community Trust and their public participation process that will determine how the money can and will be best spent / allocated within the area.</p> <p>An Integrated Development Plan (IDP) is a list of projects and future projects that a local authority</p>

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				<p>2011 have the same bare references – "to establish a Wind Farm" and "to establish a pilot WEF in the Riviersonderend area". These followed the 2009 IDP and the reference to a partnership with DBSA and private investors around a possible Wind Farm. There has been no proposal for one or more Wind Farms put to the local Ward Committees and the public, for incorporation in the IDP as agreed policy.</p> <p>It is implied in the SIA (section 4.4.2) that the other main source, the TWK Spatial Development Framework (SDF) had been revised in Sept 2010, and would be finalised and approved by Council maybe in late 2011. What was omitted was that the revision was a status quo Volume 1 draft report, which was made available for public comment. Since then, the Volume 2 draft report, covering plans and policies for the future has not been released for public comment.</p> <p>One of the aspects considered of particular relevance to the proposed Caledon Wind Farm Development is claimed to be a Policy Statement 9.7 from the SDF Volume 2, which states:-</p> <p>"Development along existing and proposed scenic/tourism routes should promote the character of the area, avoid</p>	<p>needs to act upon. Their finances and time will then be allocated to these projects as part of the budgeting process of the local authority. This issue was cleared with the local authority, whereby they declared that at least one wind farm needs to be established, but to make the goal set by the community themselves, more than one wind farm will be needed. The goal by the TWK Community is set in terms of the TWK 2030 Vision, drawn up by the residents (with support from the local authority) and it states: <i>TWK must become the first recognised local jurisdictional area for energy efficient and carbon neutrality.</i></p> <p>The TWK SDF has not been approved and it was referred back by Council because it did not address all the issues raised in the 2030 Vision and that must be included, among other reasons cited.</p>

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				<p>contrasting elements, enhance existing tourism attractions and promote tourist infrastructure at appropriate locations".</p> <p>The R43 to Villiersdorp is such a scenic route that passes through the middle of the proposed Wind Farm. The nearest turbine to the scenic N2 that passes South of the site is only 1.5 km away. Some contradiction!</p> <p>In order to support the selection and assessment of potential Wind Farm sites, TWK Municipality commissioned Savannah Environmental to carry out a Regional Assessment in 2010. Savannah are involved in EIAs for other potential Wind Farm clients at the moment, also in this area. There was no public consultation of any sort. The result is an unapproved guideline very similar to, and largely based on, the Strategic Initiative to Introduce Commercial Land Based Wind Energy Development to the Western Cape: Towards a Regional Methodology for Wind Energy Site Selection (DEADP 2006).</p> <p>The summary map indicates that essentially the entire site is comprised of areas which are either restricted (balance of one negative criterion) or highly restricted (balance of two or more negative criteria). The "highly restricted" portion of the site comprises the prominent ridgeline north of De Vleitjies</p>	<p>The R43 is recognised as a scenic route, but not all parts of it. The assumption that the whole road will be negatively affected is not true.</p> <p>Comments are noted. It must be stressed that the local authority, as well as the WC DEA&DP, advised all potential wind farm developers to undertake site specific EIA's, because most of the data that was used are not refined for site specific locations and all the studies were desktop studies listing all potential constrains, rather than providing the location of potential renewable energy generating opportunities.</p>

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				<p>farmstead on either side of the R43. The turbines and roads would be located on this prominent ridgeline, within an area indicated as “visually restricted”.</p> <p>The Theewaterskloof Vision 2030 is a Municipal document that sets out to develop a long-term vision for Theewaterskloof that has wide acceptance and active support with a range of strategies which will position the region as a financially, socially and environmentally sustainable one over the next 20 years. These strategies include the creation of the TWK area as a tourism and residential/retirement life-style destination. The features that allow this include scenic routes, pristine fynbos, mountains and hills, wide open spaces, agriculture that blends in with the rolling terrain, hiking and biking, wine farms, and existing attractions like Genadendal and Greyton.</p> <p>However, the SIA indicates a <i>potential for conflict</i> between the natural attractions and Wind Farms, whatever the claimed curiosity value the industrial turbines may have for some people.</p> <p>TOURISM</p> <p>The High Negative significance of the impact on the sense of place and landscape is linked to the huge</p>	<p>Correction: The Vision 2030 is a community produced document that sets the values of the community. Therefore, the balance of the projects and goals were set by the greater Theewaterskloof Community and all towns and their residents were part in drafting the document. The community supported the document and council only adopted it as a strategy after extensive workshops and dialogs with the total community of Theewaterskloof.</p>

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				<p>importance of tourism to the local economy, which although relatively small now is set to become the second most important growth area in TWK for the future. The claim in the SIA that this is only a local issue is not accepted – tourists travel through the area to access the Klein Karoo, the Eastern Cape game reserves, the coastal areas and the Garden Route. A proliferation of highly visible and intrusive Wind Farms may motivate the use of other routes to and from Cape Town. Whilst one WEF may only have a local and regional impact, it is considered that the cumulative effects on tourism may even have some impact at national level.</p> <p>The SIA finds that more than one large wind Farm in the area cannot be supported.</p> <p>TRANSPORTATION IMPACTS</p> <p>This impact study evaluated in some detail the roads to be used from Saldanha harbour and Cape Town where the raw materials would be sourced – except for the concrete aggregate from Villiersdorp. Concrete batching would be carried out on site, but <i>no mention made of the source, transportation or storage of water.</i></p> <p>Details are given in Table 4.1 for the raw material requirements for phase 3</p>	<p>Comments on tourism noted and captured accordingly. The SIA is correct in terms of not more than one wind farm within the area of jurisdiction. It is not only because the wind farm needs to be defined as an area within which wind farm developments can take place. Wind Farm in this sense does not have the same meaning as wind farm projects. The TWK jurisdiction is vast, open and has beauty all along its roads. The only area where wind farm developments can take place, are within the proposed development areas of Bot River and Caledon, due to reasons such as only area where the wind is feasible and existing overhead distribution lines are located. The Vision 2030 of the community latch on with the idea of tourism to the wind farms and energy efficient jurisdiction. There are no other roads to the existing three (3) roads to and from this area and the Wilderness Area to get to Cape Town. The proposed toll road system will also determine which route people will take in future.</p> <p>The use of water is discussed in Section 3.4.8 of Chapter 3 within the DEIR.</p>

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				<p>of the construction, where the turbine foundations seemingly need 103 trips each, compared to data in Appendix B where each foundation needs 86 trips. Only one set of dimensions is given for foundations in the Appendix, which is 500 cubic metres, presumably for the smaller turbines. Table 4.2 shows a figure of 40 trips per week during peak construction, all along the R43 road.</p> <p>However, there is no mention of the 700 cubic metres of spoil that must be removed for each turbine foundation and disposed of somewhere. There is also no mention of the material needed to construct new access roads and improve existing ones. Maybe the spoil can be utilised for the roads – this is not discussed at all.</p> <p>No impact assessment has been made. Clearly it would be of Negative significance, possibly mitigated in part by the use of a local aggregate supplier.</p> <p>POTENTIAL HAZZARD TO CIVIL AND MILITARY AIRCRAFT</p> <p>Section 4.10 of the Transportation study states that existing regulations prohibit Wind Farms within 35 km of an aerodrome, because of risk to aviation navigation equipment, and that the CAA should therefore be required to carry out a detailed analysis, as there are 4</p>	<p>Comments noted and discrepancies corrected accordingly within the final EIA Report submitted to the authorities for review. The trips will be 103 per turbine and the worst case scenario for the foundation sizes is used for reporting purposes, the smaller turbines will have smaller footprints.</p> <p>The extraction and re-use of spoil material during the construction of the access roads, cable trenches and turbine foundations is discussed in Chapter 3 of the DEIR and specifically in the following sections – 3.4.2, 3.4.4 and 3.4.7. The farmers also subsequently requested that the soil being removed needs to utilised on their properties and therefore it will not be transported off site.</p>

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				<p>aerodromes within this safety zone. The South African Air Force should also be consulted at the highest level as there are reports of incidences in USA.</p> <p>The DEIR states in sections 6.2.2 and 16.2.8 that application was made to CAA and their approval given. Nevertheless, the DEIR Conclusions state that a detailed investigation by CAA is required.</p> <p>One has to conclude that someone has not applied their mind properly to this matter. If the stated regulations are valid, there has to be some specific exemption applied for and granted by a recognised authority in the CAA.</p> <p>ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The EMP is required to be fully understood by potential contractors in the tendering process, so that it becomes legally binding. It is therefore deplored that this <i>draft</i> EMP seems to contain so many contradictions and omissions:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> Bird surveys to determine usage of dams, slopes and regular bird paths are only "proposed". <input type="checkbox"/> Relocation of 14 turbines to avoid key areas of conservation importance 	<p>An application to the Civil Aviation Authority (CAA) was made by Caledon Wind and has been approved accordingly. This approval is included within Appendix F of the DEIR. The discrepancy has been corrected accordingly in the EIR conclusions.</p> <p>It must be re-iterated that all mitigation measures included in the Environmental Management Plan (EMP) and finally approved by the Department of Environmental Affairs (DEA) will become legally binding for the applicant to adhere to. Furthermore, during the decision-making process, the DEA may further stipulate any additional conditions they feel should be included within the EMP.</p>

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				<p>and sensitivity is only "recommended where feasible".</p> <p><input type="checkbox"/> <input type="checkbox"/> No grazing in High Sensitive areas during the spring growing and flowering period is only "strongly recommended".</p> <p><input type="checkbox"/> <input type="checkbox"/> The EWT-BLSA protocols for surveys and monitoring (birds and also bats), considered to be best practice, are not specified.</p> <p><input type="checkbox"/> <input type="checkbox"/> The proximity of some turbines to High Sensitivity vegetation increases the fire hazards created by the turbines. The impacts of turbines on the vegetation, and vice versa, have not been evaluated.</p> <p><input type="checkbox"/> <input type="checkbox"/> "It must be ensured that <i>at least</i> 20% of the natural vegetation in all development footprints within any areas of High sensitivity natural vegetation on site is rescued, maintained and subsequently replanted" (section 4.2.1.(b)). Surely this is too low?</p> <p><input type="checkbox"/> <input type="checkbox"/> The procedures for monitoring and clearing of alien vegetation, and the area of the site to which this should be applied, is not clear.</p> <p><input type="checkbox"/> <input type="checkbox"/> It seems that the ECO is only required during the construction phase, so who has the legal and management responsibility for ongoing monitoring etc. during the operational phase?</p> <p>FINAL EIA SUBMISSIONS</p> <p>The DEA, in their letter of acceptance of the FSR, ask that all comments from all</p>	

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				<p>relevant Authorities are <i>submitted with the final EIAR</i> including specifically those from Dept. of Agriculture and Eskom. They also request that certain issues are considered and addressed, for example:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> The Western Cape CBA map. <input type="checkbox"/> <input type="checkbox"/> An overlay of the total project footprint, with details of all infrastructure. <input type="checkbox"/> <input type="checkbox"/> A report on bats (resident or migrating). <input type="checkbox"/> <input type="checkbox"/> An indication of denuded land area compared to impacted Renosterveld, which can be rehabilitated. <input type="checkbox"/> <input type="checkbox"/> Comments from Cape Nature. <input type="checkbox"/> <input type="checkbox"/> Field studies to confirm occurrence of Red Data bird species on site. <p>There is little evidence that much notice has been taken of these requests in the content of the DEIR. ALL the required information necessary to allow a decision to be taken should be contained in the DEIR – with only identified changes, additions and corrections in the FEIR.</p> <p>It is surprising that specific input is not requested from DEA&DP, Theewaterskloof Municipality, Overberg District Municipality and Heritage Western Cape all of which are mandated to take local interests into account.</p>	<p>With regards to each of the specific issues GIBB provided the following feedback:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> The Western Cape CBA map – the CBA GIS data has been provided as a map which has been include within the Flora Specialist Study, as well as accompanied by a more detailed site specific vegetation survey map. <input type="checkbox"/> <input type="checkbox"/> Report on bats – the report on bats is included within the Fauna Specialist Study undertaken by David Hoare. <input type="checkbox"/> <input type="checkbox"/> Cape Nature's comments (including the stewardship program) – these comments have been solicited on the Draft EIA Report and will be included in the Final EIA Report to be submitted to the DEA. They will at this stage also be made available for public viewing, as the Final Report will again be made available on the website. <input type="checkbox"/> <input type="checkbox"/> Eskom's comments on grid connectivity and capacity - these comments have been solicited on the Draft EIA Report and will be included in the Final EIA Report to be submitted to the DEA. They will at this stage also be made available for public viewing, as the Final Report will again be made available on the website. <input type="checkbox"/> <input type="checkbox"/> Heritage Western Cape's comments - these comments have been solicited on the Draft EIA Report and will be included in the Final EIA Report to be submitted to the DEA. They will at

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				<p>CONCLUSION</p> <p>The Medium and High Negative significance of a number of impacts, and the stated problems with their mitigation, together add up to the conclusion that this proposed Wind Farm should not be authorised, because of the further deterioration of the Endangered Biodiversity and because of adverse effects on the interests of Tourism and also residents.</p> <p>No reasons have been presented to demonstrate that Government policies on Renewable Energy can or should be applied in the development of this specific site, despite the highly significant environmental and social constraints.</p> <p>The Right is retained to amend any of these comments and submit additional material wherever it is deemed necessary.</p> <p>This Report was authored by a registered I&AP resident of Greyton, near Caledon, Western Cape whose only interest in this project is based on environmental and social issues, who understands and accepts the need for reducing dependence on fossil fuels, and increasing the relative utilization of renewable energy.</p>	<p>this stage also be made available for public viewing, as the Final Report will again be made available on the website.</p> <p>GIBB would like to thank you for your interest paid in the project as well as the thorough comments received on the draft EIA Report. These have been noted and captured accordingly and addressed where required and where possible. These comments and responses thereto will be included within the Issues and Response Report submitted to the DEA as part of the Final EIA Report for decision-making.</p> <p>Additional Comment as at 10 August 2012:</p> <p>Heritage Western Cape is included in the Stakeholder Database and as such was consulted as part of the Public Consultation process for the EIA. Comments received from Heritage Western Cape in August 2012 are as follows:</p>

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					<p>Your NID dated 1 February 2012 was tabled and the following was discussed;</p> <ol style="list-style-type: none"> 1. This application is for the first 2 phases of the Wind Energy Facility comprising of 70 turbines on 3500ha between Botrivier and Caledon 2. The associated infrastructure includes internal access roads, transmission lines, underground and overhead cables, a substation and a control centre compound in an existing building 3. Structures on site will be visually impacted 4. The development is situated within an agricultural cultural landscape 5. Archaeological resources have been identified 6. Both marked, the old farm family graveyard, and unmarked graves may be present on site 7. An HIA was submitted at the NID phase, however, no colour version of the report was provided 8. The HIA is insufficient as visual concerns have not been addressed and none of the heritage resources have been graded

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					<p>9. Turbines fall within 500m of the structures and graves</p> <p>10. The proposed Wind Farm is positioned on the R43 and will be visible from the Houw Hoek Pass,</p> <p>N2, Caledon, Riviersonderend Valley and the Botrivier Valley, also the towns of Genadendal and Greyton</p> <p>11. 19 turbines will be within 350m of the R43</p> <p>Decision;</p> <p>An integrated HIA is required that consists of an adequate record of the archaeological material including GPS co-ordinates associated with a photographic record, an assessment and grading of the identified structures including an assessment of the impact that the proposed development will have on the significance of these structures by a suitably qualified professional, an assessment of the visual impact of the development on the identified heritage resources including scenic routes and historical towns by a suitably qualified professional. An integrated set of recommendations is required. The full original</p>

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					<p>studies must be appended in full.</p> <p>Response to Heritage Western Cape</p> <p>The Heritage resources that will be affected by the proposed development are known and the impact of the turbines on them has been investigated and described in the Heritage Impact Assessment which forms part of the EIA. Turbine positions are further than 500m from any Heritage Resources and it is therefore our opinion that no further studies are required.</p> <p>The impacts on the 'cultural landscape' are visual and have been assessed in the Visual Impact Assessment. Please refer to the details of this study, included in Appendix P of the Final EIA, and to Chapter 15 of the EIA itself. The EIA found that the visual impact of the project will be highly significant, and that micro-positioning of the turbines will not assist in reducing this impact.</p> <p>Nevertheless, the EIA points out that:</p> <ul style="list-style-type: none"> • It appears that no tourist facilities (except for the views from the top of Swartberg in the Caledon Nature Reserve,) will be directly visually affected, such facilities as the Caledon Spa and Casino being shielded from views of the wind farm; and

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					<ul style="list-style-type: none"> • The visual impacts are entirely reversible should the wind farm be decommissioned after the initial 20 year lifespan of the turbines. <p>The applicant has furthermore undertaken (upon consultation with Cape Nature and the Department of Agriculture) not to construct any of the turbines that have been proposed for areas identified as high risk from a biophysical perspective by Mr van Rooyen- the Avifauna specialist. These include the following turbines: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72. The applicant has also agreed to remove turbines T17 and T20 as these were the only turbines that remained on Rensoterveld.</p> <p>Please also note that the applicant has appointed experts for both bird and bat monitoring, subject to being granted environmental authorisation. The applicant expects that it will be possible to gather a minimum of a year's data prior to construction, as required by the recommended mitigation in the Guidelines. The applicant has committed to working with the appointed specialist avifauna consultants and CapeNature Conservation to resolve any problems that are identified as a result of the monitoring in relation to the approved turbine positions.</p> <p>In terms of Agriculture subsequent to receiving the comments from the WCDoA,</p>

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					<p>three months after the submission of the Final EIR (Environmental Impact Assessment Report), the applicant has had two meetings with the WCDa on 6 August and on 9 August 2012. At the meetings the WCDa stated their concern regarding the placement of turbines in agriculturally productive land. Although it is important to the applicant to address the concerns of the WCDa, the possible mitigation measures are limited due to the limitations placed on turbine layout post EIR submission and in the light of the interests of other stakeholders.</p> <p>Nevertheless every turbine position and access roads were evaluated, in consultation with the WCDa, in terms of the possibility of reducing the impact on agricultural land by the slight adjustment of the positions of turbines and access roads, whilst making sure that the adjustments do not contradict or interfere with other limitations. Please note that only 0.86% of agricultural land will be affected by access roads and turbines</p> <p>Furthermore turbine construction will be very carefully managed. Existing access roads will be used (wherever possible) and construction hardstands will be of a temporary nature and returned to their original use after</p>

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					<p>construction. Topsoil will be stripped and properly managed. Agricultural practises will be encouraged to return around the bases of the towers. Actual long term agricultural losses will therefore be minimal. Existing roads will also be returned to the pre-construction width after construction and topsoil replaced.</p> <p>The financial viability of the farms involved in the scheme will be improved as a result of the income from the project, thereby improving the overall sustainability of the agricultural component of the farms.</p> <p>On decommissioning of the project, all access tracks and turbine positions can be fully rehabilitated – therefore no (or very little) permanent loss of agricultural potential will result from the project.</p> <p>Lastly it should be borne in mind that the applicant has already had to reduce the number of proposed turbines from the 150 to the current 37 due to limitations placed on the project by various other stakeholders. This is also close to the minimum number of turbines required for a feasible project and the loss of further turbines will jeopardise the viability of the project. The applicant further proposes to reduce the total number of turbines by a further 3, in consultation with the WCDoA, in</p>

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					<p>order to reduce the most significant impact on agriculture.</p> <p>Lastly please note that a lease agreement has been negotiated between the land owners and Caledon Wind. In the event of successful authorisation of the project, this agreement will be implemented. The lease encompasses all of the land in the study area, which is approximately 2 700 ha in extent. Caledon Wind would therefore be the responsible party to enter into a Stewardship agreement with CapeNature Conservation.</p> <p>As part of the Stewardship Agreement Caledon Wind has agreed to make available to CapeNature Conservation as much of the Renosterveld under their control as is required provided that its bid under the Independent Power Producers process is successful. This is confirmed in the attached letter from the company's director. The ground truthing prepared for the EIA has shown that there are approximately 300 ha of untransformed Renosterveld within the lease area. The period of this commitment will be for the full term of the agreement with the Department of Energy, which in terms of the Independent Power Producer's RFP is for 20 years, extendable by agreement with the Department of Energy.</p>

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20) Botrivier Landgoed Homeowners Association Signed: John Carlile Tertia Carlile Danie Sauer Elma Sauer Leon Lloyd Henriette Lloyd Johan Smit Narisa Smit Diek Verster Joekie Verster Johan Malan	Comments on Draft EIA Report	02 Jan 2012		<p>This letter serves two purposes. First we would like to register as an Interested and Affected Party. This letter is also in support of the Caledon Wind Farm Development. We are collectively home owners in the Town of Bot River. Bot River will be the town that will feel the effects (positive or negative) more than any other town within the jurisdiction of the Theewaterskloof Municipality.</p> <p>During the last few years of the development and the EIA process of Caledon Wind, we (as residence in Bo River) kept our eyes and ears open regarding the Development and the EIA process. We need to make clear that the EIA and development process of the project that was followed, was done by the book and we were informed of each step by the Applicant and the consultants doing the EIA application</p>	Comments noted and captured accordingly for decision making purposes.

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				<p>(although we were not even formally registered as an I&A Party). This is not the same for the other applications within the area.</p> <p>It is disturbing that comments (negatives) are raised from people not living within the real affected area and not by looking at a bigger picture. The studies listed or mentioned during the public hearings by them are none from the area and assumptions are made that behaviour would be the same all over the world. The only assumption, in which this scenario would be true, is that those who will object will do so out of habit or just because. It is also interesting to note that the objections or negative comments are presented by the same people with the same arguments as was for the BioTherm (BTE Wind) Application near Caledon.</p> <p>It is further a disturbing fact that none of the negative comments raised are based on facts, but rather fears or assumptions made by people with no real environmental background and can be contributed to the phenomena called "The State of Fear".</p> <p>It is a fact that the community requested to become part of the development, therefore the formation of the Theewaterskloof (TWK) Community Trust. We, as a community, will thus</p>	

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				<p>directly benefit from the dividends derived via the income of the Project and will not be reliant on the grace of a hand-out from the development company. It is further up to us (us being the residents of Theewaterskloof) to decide on how best we will use that money to the benefit for all of us. Although the natural environment is a key element to our wellbeing within the area, we also understand that even that will be lost within a few years if we do not act drastically and if we do not act against the poverty and create jobs within the area.</p> <p>It seems further that most people that provided comments thus far on the draft EIA report is ignorant of the EIA process or do not trust the National Government Department of Environmental Affairs ability to put restrictions or conditions down for developers to adhere to. In this instance we refer to the Cape Nature Stewardship Programs that the Consultant raised as a condition to the approval of the EIA process. We, as the residents, requested that in the EIA public meetings and must thus be a condition to the approval within the ROD. It is simply not up to the Development Company or Applicant that must agree with such a recommendation, but they (the developer and applicant) must conform to these condition as will be laid down</p>	

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				<p>by the National Department. It again showed us that the EIA process was not biased and that there is a distinctive line between the developers / applicant and the consultants undertaking the EIA process. All the land owners whose properties will be used for the Caledon Wind Farm indicated their willingness to enter into the Stewardship Programs, which will add value for us as residents of the area as well, by preserving and job creation via maintenance.</p> <p>This area is heavily depended on the agricultural activities and this is the main income for the area. Unemployment increased dramatically over the last few years and most affected are those working on the farms. It is for us important that there should be a balance between food security and job creation, thus the placement of turbines where also carefully scrutinised by us. We walked the site, with the consent of the landowners, and we are happy to say that the placement of turbines was done with this in mind.</p> <p>The placement of turbines on the so-called ridges are not seem as visual pollution, because the height of the masts are consistent and it will not be seen as one square block on the horizon. In an area where little is on offer during the summer months for tourists, this will offer an additional</p>	

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				<p>attraction from the area. The restrictions on the placement of turbines are met from EIA as well as Land Use Planning perspective.</p> <p>Visual Pollution for us as residents in Bot River would be additional power lines (overhead power lines), transmission lines and substations. Once again the requests from the community were adhered to and all possible power lines will be underground, or placed like the substation out of sight. The existing distribution lines will be used, which is a huge positive for us as residents of Bot River Community. We would also like to see that there is rather bigger wind farms and not a lot of small ones scattered all over the area, thus densification and ultimate use of land, is a key factor for us.</p> <p>We support the EIA Application for Caledon Wind and congratulate the EIA Consultants and Developers for a very good EIA and Development Project. We hope that the ROD for the application would be positive and that we as residents will reap the positive impact of the Caledon Wind Farm soon.</p>	