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22/07/2011

Re: **Rheboksfontein ref- 12/12/20/1582**

I Bodo Gent am writing as a local resident and directly affected party to **OBJECT** once again to the above application.

After attending most, if not all of the open meetings, it has become quite evident that there are a number of objections to the above project. People are not objecting to the fact that this is renewable power but rather to the fact that a lot more of the environment and nature will be destroyed in the erection process. Over and above this, the Darling Hills are a natural wonder in the Western Cape. The fact that these Industrial structures are to be erected in a totally rural and tranquil area is a little more than just concerning. Tourism plays an integral part in the economy of not just this area but of the entire region as a whole. These structures will be visible from as far a field as 30 kilometres or more in certain areas. Surely this is not the picture we want people to remember when they come here to view the fields of flowers every year? The R27 at the best of times, is prone to heavy traffic flow and fatal motor accidents happen on a regular basis. I am concerned that driver distraction due to the wind turbines visual impact will add to this dilemma.

This project borders on our property and although 5 or 6 turbines in the original draft EIA have been removed, I fail to understand why numbers 43, 46, 47 and 48 have been left so close to the ridge line. When one considers that the height of the ridge is approximately 80 metres high and the turbines are 145 metres in length, then these monsters will tower 225 metres above our farmstead. This fact is easy to ignore if this property does not belong to you but it becomes a totally different scenario when one **IS** the owner. The developer cannot guarantee that property values will not plummet so who do we turn to should this happen? When one reads about this in the rest of the world, property values in **rural** areas drop by up to **15%** and remain unchanged in residential areas. Will somebody compensate us if this should happen? The developer says they considered the Regional Assessment Methodology in the revised draft EIA, this may be so but I still have 4 of these monsters towering over my farmstead on a ridgeline.

Another major concern is the fact that explosives will be used in the granite hills to make way for the foundations. We have 5 or 6 springs on Doornfontein and my worry is that these springs will be disrupted, causing them to collapse. Water on our farm is scarce and a major necessity and if this should happen, my livelihood as a farmer would be directly affected. The developer, as yet, has not said what will become of the 43 000 tons of granite that will be coming out of the holes made for the foundations. We are led to believe that all this material will be used to build the roads on site. I tend to think that the roads would already have been built by this stage and surely this granite rock would be too rough a material to use for roads?

My last point is the fact that the overhead powerlines will traverse our property and that there will be a need for the planting of poles. I have just finished game fencing Doornfontein and was about to stock it with game, now we will have to reconsider and wait for the outcome of this project.

#### **Conclusion**

I am perturbed that major developers are able to come into an area as pristine as the Darling Hills, erect a facility such as this and in the process upset as many residents as they do. Then once it is done they leave and we sit with all the damage.

Yours Truly

Bodo Gent

## **COMMENT ON REISSUED DRAFT EIA**

### **FOR SAVANNAH CONSULTING/MOYENG ENERGY**

## **RHEBOKSFONTEIN SITE, NEAR DARLING**

**DEA 12/12/20/1582**

### **SUMMARY**

The proposed Wind Farm contains areas of Vulnerable and Endangered Critical Biodiversity vegetation that must not be further damaged. It is within the boundaries of the West Coast Biosphere, which is one of south Africa's prime bird areas. In this area are a number of Nature Reserves and other tourist destinations that attract local and international visitors throughout the year. The viewshed for the site is huge.

*On the basis that there is now sufficient evidence to demonstrate beyond any doubt that the environmental impacts associated with both the original and the revised versions of this proposed Wind Farm are not acceptable, even with the mitigation measures put forward, it is considered that this application should not be authorised.*

### **MAPS AND GUIDELINES**

Although the new maps are better than previous ones, and are very pretty to look at, the amount of missing or illegible information is significant:-

Turbine laydown areas,  
Wetlands crossed by connecting cables and roads,  
Footprints of substations,  
Differentiation between old and new roads,  
Spoil heaps,  
All 'No-go' areas and constraints (ridge lines, 20 metre contours),  
Relevant features within 20 km of site area,  
Tourism destinations, important bird roosts and flight routes etc within 1 km of site area,  
All constraints potentially affecting the positioning of turbines and infrastructure.

Adherence to the Western Cape Guideline on Wind Farm site selection, although not mandatory, is 'recommended' by DEA, and therefore needs *to be taken into account*. In this DEIR, many of the important criteria in this guideline have been ignored. In particular, buffer zones are still arbitrarily used, when convenient, whereas they should be considered minimums:-

Local tourism route buffer zone, such as R315	2.5 km
Provincial route buffer zone, such as R27	4 km

## REVISION OF SITE LAYOUT

The revised DEIR of June 2011 shows a confused state of affairs, apparently with TWO site layouts, the original one with 80 turbines (without the mitigation measures proposed by the specialists) and a revised version dated May 2011, also with mitigation measures omitted. The revised EMP still refers to the original layout of 80 turbines and 3 substations.

## VISUAL IMPACTS

The reality of the Visual impacts is:-

- The needs of the commenting Authorities and the I&APs, to have their concerns over the visual impacts of the proposed Wind Farm addressed, have not been satisfied.
- Over 40 households identified within 10 km of the site would be subjected to High or Very High Negative visual impacts – the actual number of persons was not quantified.
- Very little concern has been shown to owners of local tourist destinations, their livelihoods or the jobs of their employees, for example the casual mention of 15,000 annual visitors to Khwa tuu Culture Centre, or the thousands from South Africa and abroad who visit the West Coast Park, who will not be able to get there without travelling through an industrialised landscape.
- The indirect Impact on local tourist traffic, access to local destinations, road congestion etc is 'assessed' as Low Negative significance – with no mention of the *thousands* of truck journeys for foundation spoil, concrete, deliveries of materials and equipment, road surfacing material, etc.

The situation is compounded by the spurious opinions expressed in the report:-

- "This facility is not likely to detract from the tourism appeal, numbers of tourists or tourism potential of the existing centres".
- "Findings of the Social Assessment also indicate that a Wind Energy facility is likely to benefit local tourism by attracting people to the area to view the facility" – for 25+ years?

A far more realistic statement from the DEIR is:-

"A definite land use conflict exists in all parts of the West Coast Biosphere buffer area as visual intrusion will impose a limitation on conservation based development and tourism in the future".

## SITE CONSTRAINTS

The maps of both versions of site layout, as stated above, are still inadequate in presenting all the constraints that are included in the various guidelines.

The natural vegetation is said to be largely transformed agricultural land with about 14% in pristine condition and another 9% partially disturbed, but this is over the whole study area. In fact, the revised map shows about 20 turbines positioned in the High Sensitivity habitat, 2 on Heritage sites and 3 on the edge of the Park viewshed protection zone, and about 16 more within the 1 km buffer zone for noise receptors. If the recommended buffer zones to the tourist routes are taken into account, there would be very few turbines remaining. It should also be noted that many of the turbines are too near to the site boundaries.

Unfortunately, the map quality does not allow proper scrutiny of the possible impact of new and widened roads and cable trenches on what is left of the Endangered or Vulnerable vegetation. The maps also do not differentiate between wetlands, areas sometimes or regularly flooded and any permanent bodies of water. If flooding is annual, then presumably this could have a significant affect on the bird populations, especially during the breeding season.

Has the need for the fynbos to be burnt every 15-25 years been taken into account?

## **NOISE IMPACT**

The new Noise Study is commended as it really emphasises the problems of trying to finalise prospective turbine and infrastructure positions before all the constraints have been properly assessed and accurately located.

The noise assessments have been interesting in that, although none of the Regulations seem to specifically cover the situations experienced on Wind Farms, this report determines the essence, which is the possible disturbance of sleep patterns etc over a period of time, as has been reported in the USA. The proposals are clear that the buffer distance to residences should be 1 km, confirmed by DEA, yet the report refers to the need to confirm the noise model if any turbine should be re-positioned at less than 1 km from a receptor. *The specialist report conflicts with statements in the EMP.*

It is to be hoped that the proposed protocol for reporting of symptoms and monitoring the sound levels over time will be used throughout the industry.

## **ISSUES AND RESPONSES**

A number of issues have been raised and all too often they just get 'noted' and ignored in the general EIA report:-

- Less environmental damage will result by revising the routing of the 132 kV power line; all alternatives should be assessed.
- SAAF reply re radar interference issues; full assessment required by SAAF. Buffer of 35 km.
- There appears to be no response yet from DWA, concerning the wetland areas etc.
- Bird and bat Best Practice guidelines for monitoring only recently issued.
- Fire hazards to/from veld, and turbines too close to property boundaries.
- Traffic study for the construction phase, important for the local tourism sector especially.
- Affect of Wind Farms on local Property values and Rates.

## **GENERAL**

It is noted that, amongst the huge number of individuals, businesses, Councils, private and public Nature reserves, Government Departments, neighbour farmers etc, almost all the comment in the Issues Report is severely critical. There is evidently a strong conviction that, however one may support Renewable Energy projects, there are many locations that would have significantly less environmental issues. Such public evidence as there is available, such as the Western Cape Wind Farm site selection guideline, confirms the possible location of numerous suitable sites.

Unfortunately, the Wind Farm sector stick to their collective claim that all site-specific wind data is private information, so nearby sites cannot be compared. With all the secrecy surrounding the landowner/site agreements and the uncertainties relating to Eskom's grid connectivity, it is difficult to compare prospective Wind Farm sites. Thus, the duty in NEMA to evaluate Alternative activities

can only be met by evaluating comparative and alternative Government funding in the other Renewable Energy projects, which undoubtably would show far better return on investment, be environmentally more suitable and have considerable local employment prospects. It is time that the Authorities re-thought this whole complex subject.

## CONCLUSIONS

It is considered unfortunate that this application was submitted as it was, and evidently will be re-submitted again as soon as possible, without much regard being shown for all the significant residential, farming, cultural and tourism interests in the West Coast area. It is also a shame that so little notice has been paid to Cape Nature, West Coast Biosphere, local Councils, private and public Nature Reserves etc. Very evidently, the Applicant's plans are not supported or endorsed by the vast majority of those who will be affected by the project, should it be authorised.

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We reserve the right to amend any of these comments and submit additional material wherever deemed necessary.

This Report was authored by registered I&AP residents of Greyton, near Caledon, Western Cape whose only interest in this project is based on environmental and social issues, who do understand and accept the need for reducing dependence on fossil fuels, and increasing the relative utilisation of renewable energy:

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By CKR Willis et al

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By DEA&DP

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By Eskom et al

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## SCIENTIFIC SERVICES

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<b>reference</b>	SSD14/2/6/1/8/5/ 40&46&95_WindEF_Rheboksfontein
<b>date</b>	01 July 2011

Shawn Johnston  
Sustainable Futures ZA

By email: [swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)

Dear Mr Johnston

**RE: Proposed establishment of the Rheboksfontein Wind Energy Facility near Darling, Western Cape – amended Draft Environmental Impact Report.**

DEA Ref: 12/12/20/1582

CapeNature would like to thank you for the opportunity to comment on this proposed activity and wish to make the following comments in addition to those we submitted on 26 October 2010 regarding the first Draft EIR:

1. Historically, the entire site was covered by Swartland Granite Renosterveld in the north and Hopefield Sand Fynbos in the southern part of the site. Although much of the site has been transformed and degraded, there is some natural vegetation remaining, mainly in the southern part of the site. All natural vegetation on site can be considered to have very high conservation value. No turbines, substations or other infrastructure should be placed within any natural vegetation. We are therefore pleased to note that substation 1 is no longer required and that turbines and other associated infrastructure have been moved out of areas containing Critically Endangered or Endangered vegetation. An area which remains of concern is the main access road which will need to cross a wetland area. The design of the crossing structure must be approved by a freshwater specialist.
2. We also acknowledge that an amended layout has been provided and that the specialist and I&APs have been given the opportunity to comment.
3. The avifaunal specialist has indicated that avifauna are likely to be significantly negatively impacted in some areas of the facility and despite the proposed layout being amended and the number of turbines being reduced, the bird specialist was not able to state with any confidence that this would reduce the potential impacts on birds. It must be remembered that this site lies close to a known fly-way and several important bird species are likely to visit or pass through the site. Therefore, the importance of detailed bird monitoring and resultant mitigation measures can not be overemphasised.
4. We still maintain that additional monitoring should be conducted **pre-authorisation** (not just pre-construction) so that the presence or absence of certain bird species and potential impacts thereon can be predicted with higher confidence.

5. We would like to suggest all wind energy facilities which are granted environmental authorisation are granted it with the condition that turbines are built in a phased manner so that more complete monitoring data can be obtained before large facilities (or several facilities close to each other) are completed. In light of the many other applications in this region, cumulative impacts are of ever-increasing concern.
6. The feasibility of all proposed mitigation measures must be confirmed prior to the report being submitted to DEA for authorisation. Confirmation of conservation areas within the site being able to be included in CapeNature's stewardship programme within a short time period from when the record of decision is given, **must be provided before submission of the final EIR** to DEA for authorisation otherwise stewardship can not be considered as a mitigation measure. Additional consultation with the relevant stewardship officer is required. We acknowledge that the Cape West Coast Biosphere supports the stewardship recommendation but this is not the same as having confirmation that it is a feasible mitigation measure.
7. With regards to the EMP, we are pleased to note that it includes mitigation **and** rehabilitation measures for the protection of botanical biodiversity on the site. We are also pleased to note that performance indicators have been provided in the construction and operation EMPs.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alana Duffell-Canham  
For: Manager (Scientific Services)



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STRATEGY & PLANNING – Environmental Resource Management Department: Environmental and Heritage Management Services: Districts B & C

27 July 2011

Sustainable Futures  
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[Fax: 086 510 2537]

C/o Savannah Environmental (Pty) Ltd

Attention: Mr Shawn Johnston / Ms Ravisha Ajodhapersadh

[Fax: 086 684 0547]

Dear Sir/Madam

**PROPOSED RHEBOKSFONTEIN WIND ENERGY FACILITY NEAR DARLING, WESTERN CAPE PROVINCE – REVISED ENVIRONMENTAL IMPACT REPORT [DEA Ref: 12/12/20/1582]**

The abovementioned revised *Environmental Impact Report (EIR)*, dated June 2011, refers.

The facility is not located within the municipal jurisdiction of the City of Cape Town ('the City). However a section of the proposed new 132kV overhead transmission line, required to link the generated power into the Eskom network from the wind farm via the existing Koeberg-Aurora 400kV servitude into Eskom's Dassenberg substation in Atlantis, does traverse this local authority's jurisdiction. As such the City's comment is limited to the said section of the transmission line.

1. The principle of an alternative energy source, and its associated benefit of a reduced carbon footprint, is supported. As such this initiative is welcomed.
2. The proposed new 132 kV transmission line into Eskom's Dassenberg substation would have no impact on the City of Cape Town: Electrical department other than the possibility of elevating the network fault level imposed on the bulk intake point supplying the City at Dassenberg. The applicant and/or Eskom must therefore take appropriate measures to ensure that the fault level remains within acceptable limits.
3. In order to preserve the critical endangered Atlantis sand fynbos, within the existing Koeberg-Aurora 400kV servitude, the Botanical specialist's recommendation "...that the proposed power line servitude not be bushcut, and that the alien vegetation management be undertaken in the area on an annual basis..." is supported. To this extent the proposed mitigations listed in *Objective 7.2* of the draft EMPr is in order, provide that the following two additions are added:
  - 3.1 'Bush cutting within the servitude must be limited to taller vegetation...' The indicator 'taller vegetation' is open to interpretation and therefore misuse. The minimum height of the bush cutting application must be specified;
  - 3.2 Monitoring and management of Atlantis sand fynbos is a specialized skill. As such the proposed independent environmental manager should have suitable knowledge of the endemic vegetation type. Alternatively the appointed environmental manager should

regularly liaise with the West Coast Biosphere reserve in order to develop the necessary skill.

Upon completion of the final EIR 1 x CD and 1 x Hard copy of the report must kindly be submitted to this office for record purposes.

Yours faithfully



(for) **Regional Manager: ENVIRONMENTAL & HERITAGE RESOURCE MANAGEMENT**



DEPARTMENT OF  
ENVIRONMENTAL AFFAIRS  
& DEVELOPMENT PLANNING

Provincial Government of the Western Cape

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**REFERENCE:** E12/2/4/7-F5/5-2345/11  
**ENQUIRIES:** MS. C. MUSEMBURI  
**DATE OF ISSUE:** **24 AUG 2011**

The Director  
Department of Environmental Affairs  
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**PRETORIA**  
0001

**Attention: Ms. S. Vilakazi**

Tel: (012) 310 3891  
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Dear Madam

**REQUEST FOR COMMENTS ON THE REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT ("EIAR") FOR THE PROPOSED ESTABLISHMENT OF A WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR DARLING, WESTERN CAPE.**

The abovementioned request for comments dated 24 June 2011, received by the Department on 27 June 2011, refer. (The Department of Environmental Affairs ("DEA") reference number is: 12/12/20/1582).

This Department has the following comments:

The National Environmental Management Principles, *inter alia*, state that "Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option" (Section 2(4)(b) of the National Environmental Management Act, 1998, Act 107 of 1998, as amended ("NEMA")). The NEMA defines the "best practicable environmental option" as "the option that provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as in the short term". Taking these Principles into consideration:

1. Regional Context

It is noted that this Department's Regional Methodology for Wind Energy Site Selection was considered for the proposed development. However, the proposed site is not consistent with the Regional Methodology. The following is of consideration:

- the proximity of the West Coast Biosphere Reserve to the site and the buffer distances as required by the Regional Methodology;
- the proximity of the proposed site to the already established Darling Demonstration Wind Farm and the buffer distances as required by the Regional Methodology; and
- the buffer area around the major roads as required by the Regional Methodology, especially the West Coast Road (R27) as a tourist route;

## 2. Visual impact of the proposed masts

The Darling, Riebeeck Valley area and Yzerfontein are identified as the primary tourism anchors within the Swartrand Municipality. Darling's attractiveness is identified as mainly socio-cultural while that of Yzerfontein is natural. From a strategic perspective, these areas must be prioritized in terms of tourism development. It is envisaged that the proposed development, although reduced in extent, would still be visually exposed to the surrounding areas that are generally seen as having a special landscape and tourism value. This Department supports the conclusions made in the Addendum to the Visual Impact Assessment Report dated June 2011 and compiled by MetroGIS (Pty) Ltd, that *"the study area is not considered ideally suited to the development of a WEF primarily due to its tourism value"*.

## 3. Heritage Impacts

When considering a site for a wind energy facility one of the criteria to take into account is how vulnerable the landscape is to change. The proposed site is generally seen as having a high scenic value with a high cultural and tourism potential, brought about by its location on the Atlantic seaboard. The sea and hills create the landscape character of the area. The proposed construction of these masts on the proposed site will result in a change to the current landscape character. Although the proposed development has been reduced in extent, it is still concerning that:

- *"Impacts to the one significant archeological site are probably slightly increased.....;*
- *Impacts to two significant tree lines will probably still occur (one will have a turbine sited immediately alongside it and another will be crossed by a power line. These tree lines should be retained undisturbed;*
- *Roads have been planned at 90° to the slopes in visually prominent locations and will result in visual scarring and fragmentation of the agricultural and natural landscapes; and*
- *Overall visual impacts are highly unlikely to be effectively mitigated"*.

The construction of internal access roads, laydown areas and underground cable routes will similarly impact on the heritage sites as well as the natural vegetation on site. This Department therefore, supports the conclusions made in the Supplementary Heritage Report dated 08 June 2011 and compiled by the University of Cape Town Archeology Contracts Office that the site *"is generally unsuited to the type of development proposed"*.

## 4. Biophysical impacts

The photograph (Figure 6.2. on page 108 of the revised draft EIA report) is not adequately detailed to clarify the residual impacts of the placement of the turbines on the areas of botanical sensitivity. It is, however, noted that there are potentially sensitive areas on the site, characterized by non perennial streams, wetlands, drainage lines or heritage sites and that the site was mapped as being of High sensitivity in the baseline study compiled by Nick Helme Botanical Surveys (2010). This Department is of the opinion that no development must be allowed on any remaining natural vegetation and on wetlands on site and recommends that the site be considered for conservation purposes.

It is further noted that the construction of the main access road will have potential impacts on the wetlands on site. It must however be noted that the potential access roads must be designed in such a way that it does not inflict any negative impacts on any of the sensitive vegetation and the buffer areas (including water bodies, vegetation corridors, rocky outcrops etc.).

Similarly, the potential impacts of all laydown areas, underground cable routes, or any other construction activities on sensitive areas must be avoided.

## 5. Power Lines

A 132kV power line is proposed to connect the substations at the wind energy facility to the electricity network at the Dassonberg substation in Atlantis. It is noted that the proposed power line will cover a distance of approximately 43km and will cross many areas of high botanical sensitivity (totaling approximately 28 km in length). It is further noted that at least 80% of the route is through a critically endangered vegetation type (Atlantis Sand Fynbos). It is further noted that from a social perspective, approximately 2km of the proposed power line traverses high potential agricultural land on Bonteberg and Alexanderfontein Farms where vineyards and olive groves are established. The proposed power line will significantly impact on the farming activities in this area as well as on the high botanical sensitive areas.

## 6. Cumulative Impacts

Cumulative impacts are a fundamental component of the recommended Regional Methodology for Wind Energy Site Selection. It is noted that related applications in the Darling area (from different applicants) have been submitted to the Department of Environmental Affairs. It is further noted that the already established Darling Demonstration Wind Farm (with four turbines) currently has an application to expand to twenty turbines. It is concerning that a very high negative visual impact may result by allowing wind farms to be too close together. The cumulative impacts of the proposed wind energy facility and the power line will be significant. Given the large scale and value of the Darling landscapes to tourism and heritage, it is recommended that wind energy sites based on an overlay of the preferred wind energy areas are considered to ensure that a minimum distance of 30km and a preferred distance of 50 km separate any future wind farm.

## 7. Conclusion

When considering the issues of concern raised above, the cumulative implications and the fact that this Department's comments on wind energy facilities is guided by the Regional Methodology for Wind Energy Site Selection, this Department is of the opinion that the proposed site is not suitable for the proposed wind turbine facilities and is therefore **not supported**.

You are required to quote the above-mentioned reference number in any future correspondence in respect of the proposed development.

This Department reserves the right to revise or withdraw any comments or request further information from you based on any information that might be received.

Yours faithfully



**ZAAHIR TOEFY**  
**DIRECTOR: ENVIRONMENTAL AND LAND MANAGEMENT (REGION 2)**

Copies to: (1) Ms. R. Ajodhapersadh (Savannah Environmental (Pty) Ltd.)  
(2) Mr. S. Johnston (Sustainable Futures 7A)

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# DEPARTMENT of AGRICULTURE

Provincial Government of the Western Cape

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www.elsenburg.com

Our Ref : 46 0037  
LandUse ref : 20/9/2/2/5/441 & 430 & 261  
DEA ref : 12/2/20/1582  
DAFF ref -old : 01/22396(1) Consent 38673 (31 May 2004)  
ENQUIRIES : JH Smit

Savannah Environment

PO Box 148

Sunninghill

2157

For attention: Jo-Anne Thomas

### **REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

**FARMS 567; 571; 574/1; 551/1; 568; 552/2; 1192:**

**DIVISION MALMESBURY: SWARTLAND MUNICIPALITY**

The previous comments of the Provincial Department of Agriculture: Western Cape dated 27 October 2011 and 11 November 2010 were made and sent to your office through the office of the LandUse Manager at our head office. Regardless of this, your letter of 24 June 2011 was wrongfully sent to this office for comment. The information (on CD) was however referred by this office to the relevant office being **the Department of Agriculture Western Cape: LandUse Management; Private Bag X1; Elsenburg** for filing, tracking and commenting. In future please use the address of the LandUse Manager for official correspondence and not regional offices in our province. Only the cover letter and CD reached our offices. In future please provide hardcopies for commenting purposes and furthermore to ensure commenting on all the relevant information.

The previous letters of our Department dated 27 October 2011 and 11 November 2010 has also reference. In these letters certain information was requested. The applicant neglected to respond successfully on these requests. It was furthermore also stated then and it is again stated now that the draft guidelines of the DAFF renders the application fatally flawed as the requested information as stated in our previous letters did not form part of the content of the document.

In your Revised EIA reference was made to the Subdivision of Agricultural Land Act 70 of 1970, yet the relevance of this piece of legislation is downplayed in this report. The only reference as could be detected is on Page 190 where it is stated that areas of high potential agricultural land should be avoided. However, nowhere in the document it is stated and proved how this objective would be accomplished.

Page 60 of the Draft EIA as revised; make reference of the regulation in terms of the LUPO 15/85. Please note that this office will not support a rezoning of the properties or portions of it for the proposed WEF. The temporary nature of technology (being approximately 20 – 30 years) must be acknowledged. These properties are zoned Agriculture and other means (*as recently proposed by the department of Environmental Affairs and Development Planning*) must be explored in order to regulate this development in terms of the LUPO 15/85.

The visual impact on the sense of place remains a challenge to all (even Alternative 2) as the effect of mitigation will be minimal. In the document mitigation measures refers to consulting with other landowners on whom this development will impact on with regard to re-siting of the wind turbines. This re-siting must form part of this document in order for the approving authority and IAPs to assess the new sites.

The Heritage Report refers to visual scarring and fragmentation of the agricultural and natural landscapes by the supporting infrastructure.

Erosion was highlighted by the geotechnical engineering consultants.

The DEA requested in paragraph 2.1 of their letter dated 29 March 2011 more detail information regarding the layout and extent and detail of direct impacts of construction and methods. This information was not included in our copy. Scarring of the landscape, subsequent erosion and loss of high and unique potential agricultural land therefore remains a concern.

Please refer the requested information as well as the Final EIA Report to the LandUse Manager of the Provincial Department of Agriculture: Western Cape as well as the Department of Agriculture, Fisheries and Forestry for comment.

The surrounding area was also evaluated from an agricultural point of view. To control the ongoing infestation of alien vegetation is regarded a challenge. The proposed EMP must therefore include a sustainable alien clearing program.

Please feel free to contact this office for clarity in regard to this report.

Kindly quote our reference number in any future correspondence.

The department reserves the right to revise initial comments and also to request further information based on information received.

Yours sincerely

**JH Smit**

**West Coast District Manager: LandCare**

**2011-08-03**

*Copies:*

*Department of Agriculture, Forestry & Fisheries*

*Directorate: Land Use and Soil Management*

*Private Bag X 120*

*PRETORIA*

*Provincial Department of Agriculture: western Cape*

*LandUse Management*

*Private Bag X1*

*ELSENBURG*

## Ravisha Ajodhapersadh

---

**From:** Jenna Lavin <Jenna.Lavin@pgwc.gov.za>  
**Sent:** 25 July 2011 07:18 AM  
**To:** Ravisha Ajodhapersadh  
**Subject:** RE: rheboksfontein revised EIA

Dear Ravisha,

As indicated previously, you are welcome to present to HWC staff however, HWC staff do not have the delegated authority to make decisions on matters of this nature. As the IARCom requested the presentation, the IARCom is the only authority delegated to make a decision on the presentation.

As such, you will not receive a comment from HWC before the IARCom meets on 10 August.

Kind regards

Jenna

Jenna Lavin

Heritage Officer (Archaeology)

Heritage Western Cape  
Department of Cultural Affairs and Sport 3rd Floor, Protea Assurance Building Greenmarket Square  
Cape Town  
8000

Tel: (021) 483 9685  
Fax: (021) 483 9842

-----Original Message-----

From: Ravisha Ajodhapersadh [mailto:ravisha@savannahsa.com]  
Sent: 22 July 2011 01:41 PM  
To: Jenna Lavin  
Cc: 'Tommie Potgieter'  
Subject: RE: rheboksfontein revised EIA

Dear Jenna

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Please advise, a time and venue.

Regarding a presentation to the committee, this will have to be done separately, as the EIA comments period ends next week, we are however willing to have a meeting with the committee, Post-EIA.

Please confirm.

Kind Regards

Ravisha Ajodhapersadh

Savannah Environmental (Pty) Ltd  
Unit 606, 1410 Eglin Office Park  
14 Eglin Road  
Sunninghill

Tel: +2711 234-6621  
Fax: +2786 684 0547  
Cell: +2784 300 0660  
Email: [ravisha@savannahsa.com](mailto:ravisha@savannahsa.com)  
[www.savannahSA.com](http://www.savannahSA.com)

-----Original Message-----

From: Jenna Lavin [mailto:[jlavin@pgwc.gov.za](mailto:jlavin@pgwc.gov.za)]  
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Dear Ravisha,

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However, as it was the Impact Assessment Review Committee that requested the visual representation, I would recommend that you present to the committee at the next IARCom meeting to be held on 10 August 2011.

Please let me know whether this is convenient for you.

Kind regards

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>>> "Ravisha Ajodhapersadh" <[ravisha@savannahsa.com](mailto:ravisha@savannahsa.com)> 14/07/2011 10:48

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Please advise.

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**Sent:** 14 July 2011 01:59 PM  
**To:** Ravisha Ajodhapersadh  
**Subject:** Re: rheboksfontein revised EIA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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## Ravisha Ajodhapersadh

---

**From:** Jenna Lavin <Jenna.Lavin@pgwc.gov.za>  
**Sent:** 17 August 2011 01:08 PM  
**To:** Ravisha Ajodhapersadh  
**Subject:** RE: Rheboksfontein

Dear Ravisha,

So sorry it has taken me so long to respond. Unfortunately you will have to wait for the next committee meeting for comment.

The comment from the last meeting as recorded in the minutes is as follows:

The matter is deferred until the documentation describing the revised proposal/layout and the results of the public consultation in that regard is received.

Once HWC has received the requested additional copies, they will be distributed to Impact Assessment Committee (IACom) members, for discussion at the next IACom meeting to be held on 7 September 2011.

Kind regards,

Jenna Lavin

Heritage Officer (Archaeology)

Heritage Western Cape  
Department of Cultural Affairs and Sport  
3rd Floor, Protea Assurance Building  
Greenmarket Square  
Cape Town  
8000

Tel: (021) 483 9685

Fax: (021) 483 9842

---

**From:** Ravisha Ajodhapersadh [mailto:ravisha@savannahsa.com]

**Sent:** 15 August 2011 08:49 AM

**To:** Jenna Lavin

**Cc:** joanne@savannahsa.com; 'Tommie Potgieter'

**Subject:** RE: Rheboksfontein

Hi Jenna

Thanks for accommodating us.

I will be back in the office on Monday, and will arrange for copies to be sent.

On another note, I noticed at the committee the chairperson said "the matter has been deferred" for HWC comments on Rheboksfontein EIA. What does this mean in terms of HWC sending us comments and when? Do we have to wait for the next committee meeting, when is this

The public review period ended, we do want to ensure HWC issues are taken care of in the EIA.

Thanks

Kind Regards

Ravisha Ajodhapersadh

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Unit 606, 1410 Eglin Office Park  
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---

**From:** Jenna Lavin [mailto:Jenna.Lavin@pgwc.gov.za]  
**Sent:** 11 August 2011 11:54 AM  
**To:** Ravisha Ajodhapersadh  
**Subject:** Rheboksfontein

Hi Ravisha,

Thank you so much for coming through yesterday. It was lovely to finally put a face to a name.

I have checked and I was mistaken – HWC has received the revised EIA for this project. At the same time this was received, we also received a letter from you acknowledging our original response and requesting an opportunity to present to the committee.

It seems that only one copy of the revised EIA was submitted to HWC. Please can you submit 3 more copies of the revised EIA so that I can distribute these copies to the members of IARCom to read and apply their minds.

I would like to apologise for not requesting these additional copies sooner.

Kind regards,

Jenna Lavin

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Department of Cultural Affairs and Sport  
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Final input with regards to the Rhebokfontein Wind Farm Proposal

From M.H. Duckitt, Rondeberg Private Nature Reserve

Comment following Tuesday 19 July meeting at IKWattu

**A: Broader *community* issues:**

1. It comes as quite a surprise to hear that the **EIR has already been submitted** to DEA while few if any of the public comments or concerns raised at the last public meeting has been included/are known to have been included.  
Perhaps thus no surprise that DEA have requested a return to public process and input.
2. Precious little was heard at the meeting from the EAP or any environmental assessment team member while the Project Leader from Investec Bank was suitably non-committal and vague on key issues.
3. Having again referred to the CD submitted by the project team (Shawn) after the meeting no reference or information is available in the copy provided around  
(i) on *and* off site traffic (physical road) impacts and layouts and  
(ii) at turbine sites mapped impact areas to indicate no Renosterveld impacts of any kind

**Requirement:** Minutes of the meeting held at IKWattu on 19 July 2011 be circulated for appraisal and comment after EAP responses provided prior to this phase of process again effectively locking out neighbourhood input. Confirmation is needed as to how these comments are reflected in official to be submitted documentation

4. **Sense of place and Heritage issues:** Our family have lived on the Rondeberg farm for 4 generations and are both proud and protective of the environment we are privileged to live in, and care for.

The intrusive nature of wind turbines into the greater South African landscape is surely a given when assessing the broader national energy situation. The question however as raised by Jock Wagner of Jakkalsfontein of "**why here**" in the Darling Hills is most pertinent.

Yes there is wind (we are told, though not shown facts), but there is no obvious *local* energy user or client, nor any suitable *nearby connection* to the national grid should the 'grid' be the lone client.

To then impact here as intended with this project establishment, where heritage and sense of place, and may we add, duty of care is evident, to then connect up to some 26/28 kms away begs even more seriously the question, why here?

Is the wind resource here so much better than elsewhere closer to client/market or grid for that matter, which justifies the degradation of local sense of place when other better linking options are admitted by applicant to exist?

Choice of site is a priority in any enterprise. Adjacent to market/consumer, at labour source or alternatively the resources often are the vital criteria for site selection. Proof that the wind (resource) here is irreplaceable and incomparably better to all other options surely would then be the sole criteria acceptable to settle the 'why here' question.

**Requirement:** The 'why here' and 'why now' question cannot fully be answered in the affirmative. The promise of local jobs is neither evident nor likely. The full local benefit in socio economic terms needs to be tabled and fully understood, inclusive of the benefit for the land owners.

5. **Respect for Renosterveld and Fynbos:** It is not good enough to promote a green agenda power generation facility and at the same time destroy or impact negatively on irreplaceable nature just because elsewhere it is expensive, or inconvenient. No development is the sole viable option outside of sustainable and sensitive development that does not impact on the natural Renosterveld resource.

Put simply development can take place as desired, but only when full due respect and consideration is shown to the local environment and directly affected inhabitants

Thus are needed prior to proceeding any further:

(i) The to engineering standard drawings that clearly defining the full impact of all road access to each turbine site/station, the extent and position of the lay down areas, and the internal and external electricity link routes need to be tabled and provided for public process scrutiny and approval.

(ii) Having been assured that no on site concrete batching will occur, it is necessary to understand the removal and disposal methodologies for excavated material, and specifically the volumes and end destinations of such.

(iii) Equally the import onto site of concrete/premix volumes needs to be quantified and known and the technical capacity of public roads assessed and the impact appreciated by the road using public

(iv) Equally the import onto site of steel for foundations and actual tower components needs to be quantified and the technical capacity of public roads assessed and the impact known and appreciated by the public

(v) All the local conservation input is in line with National, Provincial and Local Authority policy and prescripts which specifies and requires no impact be made at all on any of the Renosterveld remnants. This remains a non-negotiable environmental specific requirement to be confirmed and fully respected throughout construction and operational phases at least.

For a project of this size to be conducted under the green energy generation label this in the first place raises to the forefront a moral issue to be honoured to the letter. You cannot sacrifice any loss or damage to significant remnant Renosterveld vegetation for project profitability reasons in the Darling Hills when less fragile and important environmental options are ignored.

Please understand this viewpoint to be a fundamentally held broader local environmental community viewpoint which should not be irresponsibly tested. Such view surely has the support of the Darling Wild Flower Society and Trust, West Coast Branch of Botanical Society as well as the Cape West Coast Biosphere who could support the project only if undertaken responsibly and at least as above.

**Private Landowner (RPNR) Issue:**

**6. Noise:**

Both the project funder and primary landowner made light of the noise issue concerns at the meeting at IKWattu.

But to only keep talking of new and more silent technologies, of responsible implementation and operational entities, and of compliance monitoring is one thing.

Firm commitment and assurances on neighbour issues of concern are another issue entirely. And the patent reluctance to back specialist and equipment supplier guarantees relative to noise with firm undertakings is more than worrisome.

Please appreciate that it if all specialists' reports and equipment specs are indicative of a situation not to justify reasonable concern from neighbours regarding noise, if the project developer is so moral and responsible in both approach and execution, why then the uncomfortable squirming away from giving the required assurances to neighbours?

**The difference between maddening noise and legal noise is substantial, and is to be formally noted.**

As an adjacent land occupier whose positive reaction to this application is sought, a peaceful and quiet nights rest guaranteed is the sole obstacle to this achieving this neighbour's approval.

Our place of residence, quality of life, and sense of place will absorb the negative visual impacts. One after all can choose to look the other way.

But you **cannot choose not to hear noise**. Even legal noise!

20 July 2011

Rondeberg PNR

Savannah Environmental (Pty) Ltd

PO Box 148

Sunninghill

2151 Gauteng

**22 August 2011**

Sirs

- Your letter dated 26 July 2011 re Rhebokfontein Wind Energy Facility Darling and received during week 33 refers

We respond as follows to your comments in blue print as provided in the letter.

### **1. Re: Traffic issues:**

Your response referred to addressed specifically road traffic issues and not the physical impact on internal and external to site road quality—especially surfaces and sub surface road base, which is seldom fixed quickly once degraded [refer Chapt 6 Sect 6.10 on P 185]

Your reference to volumes and number of trips refers again specifically to only components—275 abnormal loads/ presumably abnormal by length rather than mass?

The concern again involves construction of bases for the turbines. The removal and appropriate disposal of ground excavated and then the concrete and steel base construction materials [Chapt 2 Sect 2.7.6 P 33]

- So the unaddressed issue is the impact on all roads of the considerable mass of material needed to be exported/imported (i) onto the farms, and then (ii) across existing tracks presumably off the farms and the impact on ground tracks and storm water etc.
- The question of where and how spoils are to be disposed and or used on the property does also beg definition
- Spoils are estimated at 900 cubic meters per turbine foundation X 80 turbines=72000 or some 4000 big truck **loads in AND 4000 truckloads away** from each turbine site!
- Your estimate of 700 cubic meter of concrete per base. We note the intended use of environmentally sound materials, but the source for such is from where? 40, 50 kms?

### **2. Re Incorporation of Public Inputs [Specifically neighbourhood]**

Your response simply again does not deal with the issue. We are saying that you invite IAPs to meetings, obtain input and then '*mitigate*' such administratively away, and hope neighbours will forever remain silent.

In my specific case the issue is noise very pertinently, and at a much lesser level than sense of place / visual aspects. Put another way we can accommodate our neighbour's needs by looking the other way. The vistas are big and good and could absorb the infrastructure impact.

With noise, and especially sub liminal noise, which does not react to looking the other way we have the problem. It drives you mad even when not registering on the normal scale used to determine legal noise

The developer continues to thump the use of *modern quieter technology*. Our requirement is simple. We will not tolerate any noise level increase, especially sub liminal noise, that causes discomfort.

So the requirement is simple. Move the turbines away from us -- so it can also address the sense of place/visual aspects, or alternatively give a material and binding assurance and guarantees that we will not have our dwellings rendered undesirable to unliveable due to noise impacts.

An undertaking giving suitable legally acceptable guarantees from both the land owner, his successors in title, operator and funder of the project is awaited for scrutiny-- and negotiation if needed-- to achieve a balanced and fair agreement with suitable dispute resolution mechanism.

### **3. Sense of place /Heritage Issues.**

As a person privileged and needing to travel widely in the rural arc from Darling to Elandsbaai/Loeriesfontein/ Sutherland/Upington/ Kenhardt/ Leeu Gamka/ Oudtshoorn/ Heidelberg and more, we see a lot of South Africa where wind has been adjudged to be suitable for the erection of wind farms and have applications pending. Some even have contracted Savannah!

With two connecting options as advised to the grid almost 30km away as herein, you surely have missed a trick. You have chosen a site in an environmentally and heritage sensitive area based on needs other than those you respectfully indicate.

You fail to make the why **now and here case** for the Rhebokfontein site versus the criteria you put forward. Many better located and equally feasible and economic wind regimes occur quite widely across the Western Cape countryside we travel. And these areas are visibly subject to several applications. Are such developers stupid, or simply wiser?

Or does the local answer lie in the provision of decent long term local jobs?

### **4 & 5. Respect for Renosterveld issues:**

The Darling area is internationally acclaimed and respected for its flora, as well as the care it as community has taken over the years of this asset

Your outcome will be appealed, and further challenged as need may be, if any infrastructure or construction impact affects or impacts any the natural Renosterveld vegetation. Your specialist has generously made compromises in our view. But they who live here simply are more certain that the space does exist to work successfully around the natural vegetation and remnants. It simply is a question of Renosterveld degradation comes for free. It's the cheaper option, and not at developer's cost

To be green, and renewable, morally charges the developer to be so in all aspects surely!

To state that the **majority** of impacts will occur outside of the renosterveld **is simply not on**. NO IMPACT AT ALL is the base line community requirement. Money devalues. Renosterveld is irreplaceable, as all formal conservation bodies and involved persona will confirm.

M H Duckitt

RPNR

[mduckitt@cles.co.za](mailto:mduckitt@cles.co.za)

**From:** "Martin Halvorsen" <darlingwines@westc.co.za>  
**Subject:** **Re: Amended comments: Rheboksfontein WEF**  
**Date:** 28 July 2011 12:41:11 PM  
**To:** "Rhett Smart" <rsmart@capebiosphere.co.za>, "Shawn Johnston" <swjohnston@mweb.co.za>  
**Cc:** "Sharon February" <sharonfebs@gmail.com>, "Jimmy Walsh" <hilltopcottage@telkomsa.net>, "Janette du Toit" <jdutoit@capebiosphere.co.za>, "Izak de Villiers" <sakkiedev@gmail.com>, "Keith Harrison" <keithbharrison@lando.co.za>, "Vincent Bergh" <vinbergh@icon.co.za>, <willeml@sanparks.org>, "Wessel Rauch" <wrauch@intekom.co.za>, "Martinus Fredericks" <martinusf2@gmail.com>, "Chantel van der Merwe" <info@capebiosphere.co.za>, "Alana Duffell-Canham" <aduffell-canham@capenature.co.za>  
6 Attachments, 20.9 KB

Rhett, thank you. can you add the following. if authorisation is granted contractors using the public road network to access the proposed wind farm should have their vehicles registered in the Western Cape province. this was a concern that came up at the stake holder meeting at !Kwattu. each base of a turbine is roughly 900cub m. this is roughly 140 loads per turbine @ 5cub m perload. this material will be removed and replaced with concrete. these ready mix trucks all operate locally but the companies register them in other provinces were the license cost is much less than the Western Cape. resulting that damage to roads are by normal citizens and other vehicle owners whom have there vehicles registered in the Western Cape.  
where will the excavated material go to? this is another 900cub m x 48 turbines to be transported somewhere.  
what will the effect on tourism be? even the effect on our own route from Darling to !Kwattu and Yzerfontein.

**From:** [Rhett Smart](#)  
**Sent:** Thursday, July 28, 2011 10:05 AM  
**To:** [Shawn Johnston](#)  
**Cc:** [Sharon February](#) ; [Jimmy Walsh](#) ; [Janette du Toit](#) ; [Izak de Villiers](#) ; [Keith Harrison](#) ; [Vincent Bergh](#) ; [willeml@sanparks.org](#) ; [Wessel Rauch](#) ; [Martin Halvorsen](#) ; [Martinus Fredericks](#) ; [Chantel van der Merwe](#) ; [Alana Duffell-Canham](#)  
**Subject:** Amended comments: Rheboksfontein WEF



Dear Shawn

Please can you replace the comments sent yesterday with the comments attached? An additional comment has been added regarding the potential fire hazard presented by wind turbines.

Regards

Rhett

**Rhett Smart** | 073 151 2836

CONSERVATION OFFICER  
rsmart@capebiosphere.co.za

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## Ravisha Ajodhapersadh

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**From:** Jenna Lavin <jlavin@pgwc.gov.za>  
**Sent:** 14 July 2011 01:59 PM  
**To:** Ravisha Ajodhapersadh  
**Subject:** Re: rheboksfontein revised EIA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Ravisha,

Thank you for your email. As discussed telephonically, next week is unfortunately already booked up with meetings.

The following week - that is 25 July to 29 July would be more convenient. At the staff meeting on Monday I will raise the issue of a suitable meeting time.

I will be sure to let you know when is the most appropriate time for you to meet with HWC staff.

However, as it was the Impact Assessment Review Committee that requested the visual representation, I would recommend that you present to the committee at the next IARCom meeting to be held on 10 August 2011.

Please let me know whether this is convenient for you.

Kind regards

Jenna

Jenna Lavin

Heritage Officer (Archaeology)  
Heritage Western Cape

3rd Floor, Protea Assurance Building  
Green Market Square  
Cape Town  
8000

Tel. (021) 483 9685  
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>>> "Ravisha Ajodhapersadh" <[ravisha@savannahsa.com](mailto:ravisha@savannahsa.com)> 14/07/2011 10:48

>>> >>>

Dear Jenna

Based on the comments we got from HWC in November 2010, you requested for visual presentations of the Rheboksfontein wind project.

Do you want to have a meeting in this regard. We are in the area next week Monday & Tuesday, and propose a meeting with you, at a suitable venue of your choice.

Please advise.

Kind Regards

Ravisha Ajodhapersadh

Savannah Environmental (Pty) Ltd

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27 July 2011

Shawn Johnston  
Sustainable Futures ZA  
P.O. Box 749  
Rondebosch  
Cape Town  
7701  
email: [swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)

**Comment on the Revised EIA for the  
Proposed Rheboksfontein Wind Energy Facility and Associated Infrastructure  
on a site near Darling, Western Cape**

Dear Shawn

Thank you for providing us with the opportunity to comment on the revised EIA for the above proposed development.

The Cape West Coast Biosphere Reserve (CWCBR) extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. One of the primary aims of the CWCBR is to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. In this regard, the CWCBR would like to comment as follows:

**General**

- The CWCBR supports the reduction in number of turbines from 80 to 48. The project will however still have an impact.

**Biodiversity and Ecology**

- The removal of turbines and substations from the natural vegetation remnants is supported. However, there is still infrastructure that traverses the natural fragments, namely internal roads and trenches, as well as the overhead power line.
- The amendments to the infrastructure layout as recommended by the Addendum to the Flora Report (Appendix T3) must be implemented (Section 4). As indicated in the report,



---

**DIRECTORS**

SC February Mrs (Chair), ME Halvorsen (Vice- Chair), IAJ de Villiers,  
W Louw, V Bergh, KHB Harrison, M Fredericks, WR Rauch, SC Walsh.

the roads and trenches can't be relocated. This will result in the destruction of Critically Endangered Swartland Granite Renosterveld vegetation and is therefore not supported, unless the roads are already in existence (internal farm roads).

- An alternative alignment of the overhead power line must be determined. The footprints of the power line towers will be located in the natural vegetation remnants, which is not acceptable.
- The comments in previous correspondence related to biodiversity and ecology are still relevant, apart from the inclusion of the natural areas into the stewardship programme (as per negotiations with the developer and landowner).
- The natural vegetation must be clearly demarcated during the site preparation and construction phase and must be strictly a no-go area for all construction staff.
- Any disturbance to natural vegetation in the pre-construction, construction and operational phases must result in a suitable penalty for the transgressor.

**Social, Economic and Planning Issues**

- The CWCBR supports the removal of the turbines that are within the West Coast National Park viewshed zone and the buffer around the R27 and R315. The development will however still have a significant visual impact.
- The comments in previous correspondence related to social, economic and planning issues are still relevant.
- The Environmental Monitoring Committee (or alternative forum) should include the surrounding landowners and other key stakeholders. The forum should meet on a regular basis and must be initiated prior to construction.
- Wind turbines have been identified as a potential fire hazard, which can result from gear oil failure. There have been news articles circulated to this effect recently. This presents a fire risk to surrounding agricultural lands, natural vegetation and homesteads. In addition it results in air pollution and a visual impact. This issue needs to be addressed prior to final submission of the report.

The Cape West Coast Biosphere Reserve reserves the right to submit further comments


Regards,

A handwritten signature in black ink, appearing to read 'Rhett Smart', with a horizontal line underneath.

Rhett Smart  
Conservation Extension Officer

cc: Alana Duffell-Canham, CapeNature


26 July 2011

P.O. Box 70  
Darling  
7345

ATT: Mr Mark Duckitt

RE: Rheboksfontein Wind Energy Facility, near Darling, Western Cape Province

Dear Mr Duckitt

Savannah Environmental acknowledges receipt of your letter dated 20 July 2011, which was received on 25 July 2011 via email. The requested response to your issues/concerns stated in your letter is provided herewith (in blue text) by the EIA Project team, and where applicable, by Moyeng Energy.

1. Having again referred to the CD submitted by the project team after the meeting no reference or information is available in the copy provided??:
  - (i) on and off site traffic (physical road) impacts and layouts and
  - (ii) at turbine sites mapped impact areas to indicate no Renosterveld impacts of any kind

Chapter 6, Section 6.10 on Page 185 of the Draft EIA Report assessed the potential impacts to road surfaces, access to properties and local towns, and road safety associated with the movement of construction related traffic to and from the site. More information on the transport logistics of the Rheboksfontein project is provided in Chapter 2, Section 2.7.6 on Page 33 of the Draft EIA Report.

The revised layout shows that the majority of wind turbines occur outside areas with natural vegetation, however two turbines and access roads partially occur on natural vegetation, which is highlighted in the addendum to the botanical specialist study.

2. **Requirement:** Minutes of the meeting held at IKWattu on 19 July 2011 be circulated for appraisal and comment after EAP responses provided prior to this phase of process again effectively locking out neighbourhood input. Confirmation is needed as to how these comments are reflected in official, to be submitted documentation.

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COMPANY REGISTRATION NO.: 2006/000127/07  
VAT REGISTRATION NO.: 4780226736

Your comment is not clear, however it is assumed that the minutes of the meeting held on 19 July 2011 is requested. As best practice for public participation, the minutes of the meeting held on 19 July 2011 will be circulated to those who attended the meeting, and will be included within the final EIA Report to be submitted to DEA (and made available to registered parties as required by the EIA Regulations of 2010). The issues raised during public consultation will be responded to in an official comments and responses report that forms part of the Final EIA report to be submitted to DEA. This comments and responses report will be circulated to registered parties together with the notification of the availability of the FEIR.

### **3. Sense of Place and Heritage Issues**

Our family have lived on the Rondeberg farm for 4 generations and are both proud and protective of the environment we are privileged to live in, and care for. The intrusive nature of wind turbines into the greater South African landscape is surely a given when assessing the broader national energy situation. The question however as raised by Jock Wagner of Jakkalsfontein of "why here" in the Darling Hills is most pertinent. Yes there is wind (we are told, though not shown facts), but there is no obvious local energy user or client, nor any suitable nearby connection to the national grid should the 'grid' be the lone client.

To then impact here as intended with this project establishment, where heritage and sense of place, and may we add, duty of care is evident, to then connect up to some 26/28 kms away begs even more seriously the question, why here?

Is the wind resource here so much better than elsewhere closer to client/market or grid for that matter, which justifies the degradation of local sense of place when other better linking options are admitted by applicant to exist? Choice of site is a priority in any enterprise. Adjacent to market/consumer, at labour source or alternatively the resources often are the vital criteria for site selection. Proof that the wind (resource) here is irreplaceable and incomparably better to all other options surely would then be the sole criteria acceptable to settle the 'why here' question.

Requirement: The 'why here' and 'why now' question cannot fully be answered in the affirmative. The promise of local jobs is neither evident nor likely. The full local benefit in socio economic terms needs to be tabled and fully understood, inclusive of the benefit for the land owners.

The selection of a wind site depends mainly on three factors, namely wind resource, securing of land and grid connection. Windlab Systems had mapped large parts of the country and the Rhebokfontein site was one of a number of sites identified. The Rhebokfontein site was eventually selected based on the assessment of the three mentioned factors.

Wind data is commercially confidential and can thus not be made public, suffice to say that the Rhebokfontein wind resource is substantial.

Moyeng has been focussing on the Rheboksfontein wind energy facility for the past 3 years and intends participating in the first Phase 1 of the department of Energy's IPP procurement programme.

Moyeng have not promised "local" jobs – what we did indicate is an approximation of how many jobs will be created during construction and late during implementation – as we indicated to Mr. Duckitt, that where applicable and available, Moyeng will use local labour, we will even include it as a requirement in the Moyeng tender documentation. Local labour will be a precondition to the acceptance of the Moyeng tender.

#### **4. Respect for Renosterveld and Fynbos**

It is not good enough to promote a green agenda power generation facility and at the same time destroy or impact negatively on irreplaceable nature just because elsewhere it is expensive, or inconvenient. No development is the sole viable option outside of sustainable and sensitive development that does not impact on the natural Renosterveld resource. Put simply development can take place as desired, but only when full due respect and consideration is shown to the local environment and directly affected inhabitants. Thus are needed prior to proceeding any further:

- i. The engineering standard drawings that clearly defining the full impact of all road access to each turbine site/station, the extent and position of the lay down areas, and the internal and external electricity link routes need to be tabled and provided for public process scrutiny and approval.

The EIA report provides the conceptual design and layout of access roads to the site and to each turbine. Refer to Appendix R for maps. In addition, more detailed design and dimensions for the access roads are attached to this letter and will be included in the EIA report.

- ii. Having been assured that no on site concrete batching will occur, it is necessary to understand the removal and disposal methodologies for excavated material, and specifically the volumes and end destinations of such.

Disposal of large quantities of soil is not anticipated as the excavation for foundation in up to 4m deep per turbine, over an area of 15m x 15m (maximum). The Environmental Management Programme (EMP) states that stockpile topsoil is to be re-used in the construction process and re-used in rehabilitation of the site; furthermore it could be used as material for internal (gravel) roads.

- iii. Equally the import onto site of concrete/premix volumes needs to be quantified and known and the technical capacity of public roads assessed and the impact appreciated by the road using public.

The concrete volume required per base is heavily dependent on the final turbine base design in concert with ground bearing pressures and geological anchoring characteristics, each of which can only be finalised on an individual location basis and through trial excavation. Based on the currently available information, turbine base configuration and ground conditions it is envisaged that each turbine base will use approximately 700m<sup>3</sup> of concrete per base on average. Given the environmental CO<sub>2</sub> concerns specific to cement production final mix designs are anticipated to use a significant amount of ash or slag as substitute constituents in addition to admixture agents to reduce both the water demand of the final mix and the associated CO<sub>2</sub> emissions associated with the production of pure OPC (Ordinary Portland Cement). The typical mix of fly ash & cement will be in the region of 30%/70% split.

- iv. All the local conservation input is in line with National, Provincial and Local Authority policy and prescripts which specifies and requires no impact be made at all on any of the Renosterveld remnants. This remains a non-negotiable environmental specific requirement to be confirmed and fully respected throughout construction and operational phases at least.

The revised layout shows that the majority of wind turbines occur outside areas with natural vegetation, however a few turbines and access roads occur on the natural vegetation, which is highlighted in the addendum to the botanical specialist study. The botanical study highlights the following about areas of ecological concern

» Central Area (Turbines 13-31):

- \* Turbine 26 too close (12m) to small rocky outcrop and small patch of natural vegetation
- \* Turbine 29 within area of natural vegetation
- \* Turbine 30 too close (11m) to natural vegetation
- \* Road between 28 and 30 crosses area of natural vegetation (over a distance of 250m).

» Southern Area (32-48):

- \* Turbine 35 too close (13m) to natural vegetation
- \* Road and cable trench west of turbine 38 passes through natural vegetation (340m)
- \* Road and trench between turbines 33 and 46 passes through natural vegetation (510m)
- \* Road and trench between turbines 37 and 40 passes through natural vegetation and rocky area (200m)
- \* Turbine 40 within area of natural vegetation
- \* Turbine 48 within an area of partly natural vegetation.

It is inevitable that some access roads may occur on natural vegetation in order to maintain access to each turbine but this will be kept to a minimum

5. For a project of this size to be conducted under the green energy generation label this in the first place raises to the forefront a moral issue to be honoured to the letter. You cannot sacrifice any loss or damage to significant remnant Renosterveld vegetation for project profitability reasons in the Darling Hills when less fragile and important environmental options are ignored. Please understand this viewpoint to be a fundamentally held broader local environmental community viewpoint which should not be irresponsibly tested. Such view surely has the support of the Darling Wild Flower Society and Trust, West Coast Branch of Botanical Society as well as the Cape West Coast Biosphere who could support the project only if undertaken responsibly and at least as above.

Comment acknowledged by the developer and EIA project team (also refer to response to Point 5). Comments from the Conservation bodies such as the Cape West Coast Biosphere and Cape Nature have been requested, and they will share their opinions on the matter. Cape Nature has commented on the revised layout and EIA report, see attached. They are aware of the conservation worthy areas on the site, and are willing to take the stewardship process further; if feasible (this has not been determined yet). In addition, they are satisfied with the mitigation measures included in the EMP regarding vegetation / ecology in general. They have made their specific requirements known as part of the EIA process.

## **6. Noise Impacts on Rondeberg Private Nature Reserve**

Both the project funder and primary landowner made light of the noise issue concerns at the meeting at IKWattu. But to only keep talking of new and more silent technologies, of responsible implementation and operational entities, and of compliance monitoring is one thing. Firm commitment and assurances on neighbour issues of concern are another issue entirely. And the patent reluctance to back specialist and equipment supplier guarantees relative to noise with firm undertakings is more than worrisome. Please appreciate that it if all specialists' reports and equipment specs are indicative of a situation not to justify reasonable concern from neighbours regarding noise, if the project developer is so moral and responsible in both approach and execution, why then the uncomfortable squirming away from giving the required assurances to neighbours?

The difference between maddening noise and legal noise is substantial, and is to be formally noted. As an adjacent land occupier whose positive reaction to this application is sought, a peaceful and quiet nights rest guaranteed is the sole obstacle to this achieving this neighbour's approval. But you cannot choose not to hear noise. Even legal noise!

The noise specialist has advised that the Rondeberg Private Nature Reserve is more than 2 km from the closest wind turbine. The wind energy facility would not have a noise

impact on the Rondeberg Private Nature Reserve, even in optimal sound propagation conditions and with the wind blowing in their direction. Residents / people operating at Rondeberg Private Nature Reserve should not even be able to detect the sound from the wind turbines.

7. Our place of residence, quality of life, and sense of place will absorb the negative visual impacts. One after all can choose to look the other way.

Comment noted.

Should you have any queries kindly contact us.



EIA project team & Moyeng Energy

23 June 2011

Heritage Western Cape  
Private Bag X9067  
Cape Town  
8001

DEA Ref. No: 12/12/20/1582  
ATT: Jenna Levin

RE: Rheboksfontein Wind Energy Facility, near Darling

Dears Jenna

Savannah Environmental acknowledges receipt of Heritage Western Cape's letter (dated 03 November 2010), however received via email on 08 February 2011 for the above-mentioned project. Firstly, it is important to point out that HWC's comment on the propose project (received in February 2011), were received more than two months after the first public review period for the Draft EIA report had ended (i.e. September 2010). Therefore their issues were not documented as part of the EIA process, due to late submission of comments. The final EIA report was submitted to DEA in November 2010. Thereafter in March 2011, DEA have requested revision of the EIA and for Savannah Environmental to address HWC's issues. .

Savannah Environmental would like to respond to the matters raised by HWC on the Rheboksfontein project as follows (text in italics is the comment received by HWC), and text in blue is Savannah Environmental's response:

- 1. The site lies between 4 and 13 km from the coast. There is a high concentration of heritage resources on the proposed site including clusters of large trees and treelines, various farm structures as well as widely scattered archaeological material.*

Comment noted on the proximity of the site to the coast. The layout of the facility has been revised (see Revised Draft EIA Report of June 2011, currently out for public review), and no turbines / infrastructure will occur on any treelines, thereby eliminating this impact altogether on the site. The presence of heritage resources and how to deal with finds / destruction / permitting from HWC is dealt with in the EMP, on the procedure to be followed by the Environmental Control Officer / developer.

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COMPANY REGISTRATION NO.: 2006/000127/01  
VAT REGISTRATION NO.: 4780226736

2. *A significant Stone Age site was identified (Rheboksfontein 1).*

The Heritage Impact Assessment discussed Rheboksfontein 1 (heritage site), based on the revised layout, no turbines / infrastructure will occur on this heritage site / any others identified on the sensitivity map, thereby reducing the impact on these features to a very low probability

3. This proposal and the proposed wind farm on the adjacent property, Kerrifontein (see item 11.19), will result in a high negative cumulative visual impact.

Comment noted.

4. The proposal is adjacent to significant cultural landscapes such as the Tienie Versveld Wild Flower Reserve and the West Coast Road (R27).

No turbines occur in this area - (i.e. within 50m from within 50m of the southern boundary of the Tienie Versveld Wildflower Reserve). A buffer has been placed on the R27 main road (2 kilometre buffer).

5. The surrounding landscape has a very low absorption capacity and the turbines will be visible from significant distances. The report indicates that it is difficult to mitigate the visual impacts of the proposal. Scenic route, historic homesteads, landscape and natural environment will be negatively impacted.

As mentioned above, the scenic route (R27) has a 2km buffer around it, however the facility will still be visible between a 5km-10km distance. The presence of heritage resources and how to deal with finds / destruction / permitting from HWC is dealt with in the EMP, on the procedure to be followed by the Environmental Control Officer / developer (apart from Rheboksfontein 1 - as no turbines occur at this heritage site).

6. The reports had been prepared in isolation and consequently the conclusions were not integrated.

The HIA report is integrated into the EIA main report / assessment, refer to Section 5.7, 6.6, 7.1 and 7.3 for specific information and assessment. It appears that the HIA report, has been read in isolation from the EIA main report consolidated by the EAP - Savannah Environmental.

7. The Committee resolved not to accept the consultant's report and requested that a 3D visual presentation of the proposal be presented to the Committee to make an informed decision. The 3D presentation needs to spatialise the landscape resources, the visual consideration (from both near and far), the scenic route and the anticipated cumulative effects of the proposal.

Visual simulations (photo montages) are available for this project and contained within the Visual Impact Assessment Report (Appendix K), and this should be sufficient for use. Note that a 3D visual presentation does not exist for this project.

8. The archaeological test excavations and subsequent mitigation recommended by the archaeological consultant must be carried out for Rheboksfontein 1 Site, unless this turbine can be shifted to create a 100m buffer, or is omitted entirely. It should be ensured that no secondary impacts to heritage resources occur as a result of large trucks and cranes accessing the project area.

The Environmental Management Plan addresses this issue, see Appendix (Q), where the EMP states that a heritage walk through survey must be undertaken on the site, prior to construction, and that, if requires, permits must be obtained from HWC for their removal. Based on the revised layout, it is fair to state that no turbines occur on / within 100m from Rheboksfontein 1.

Should you have any queries kindly contact us.



Savannah Environmental

# JAKKALSFONTEIN



## NATURE RESERVE

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email admin@jkf.co.za`**

Shawn Johnston  
Sustainable Futures ZA  
PO Box 749  
Rondebosch  
7701

27 July 2011

Dear Shawn,

### **INVITATION TO COMMENT ON THE AMENDED FINAL ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE CONSTRUCTION OF THE RHEBOKSFONTEIN WIND FARM AND ASSOCIATED INFRASTRUCTURE NEAR DARLING, IN THE SWARTLAND LOCAL MUNICIPALITY, WESTERN CAPE PROVINCE**

The Jakkalsfontein Homeowners Association thank you for the opportunity to comment on the abovementioned application. For your easy reference please find our earlier letters (Annexures A & B) attached which should be read in conjunction with our latest objection below. Our latest letter of objection focus on the amended final EIA report for the Rheboksfontein Wind Farm and public meeting held on 19 July at !Khwattu.

We respectfully point out the following discrepancies in your notification of Interested and Affected Parties:

- According to the Department of Environmental Affairs letter dated 29/03/2011 to Savannah Environmental (Annexure C), you are entitled to resubmit an amended FINAL EIA report after the abovementioned department's rejection of the initial FINAL report. In your notification of Interested and Affected Parties dated 27 June 2011, you refer to a "Revised DRAFT EIA report". The perception is therefore created that the content of the EIAR is not final and that further information will be made available to Interested and Affected Parties during a later stage of the process which is not correct.
- According to the abovementioned letter of the Department of Environmental Affairs (Page 2 par 2.2. Alternatives) the investigation of alternatives is mandatory. In terms of the National Environmental Management Act, this includes investigating alternative sites. You clearly indicate in your notification of Interested and Affected Parties dated 27 June 2011 that the investigation of alternatives is limited to the layout only. The perception is therefore created that site alternatives is not a legal requirement of this process, which is not correct.
- According to the abovementioned letter by DEA (Page 2 par.2.1) the Regional Strategic Environmental Assessment of Sites Suitable for Wind Energy Facilities in the Western Cape must be taken into account. In response the applicant indicated that this document has not yet been finalised or published. Our perception is thereby confirmed that wind farm applications are presently being considered in a piece meal type approach which is not in line with responsible environmental planning practices.

The amendment of the site layout through the reduction of this facility from 80 to 48 wind turbines is not supported by the Jakkalsfontein Homeowners Association. For reasons already mentioned in our earlier correspondence, we believe that this site is not suitable for wind energy facilities of any size. The approval of a wind energy facility of any size is likely to set a precedent for other wind turbines to follow on this and nearby sites. In this regard we also oppose the existing four wind turbine Darling Wind Demonstration Project and request the authorities to consider its relocation to a suitable site as identified through a strategic environmental assessment process.

We find it ironic that the latest amendment of the Rheboksfontein site layout by the applicant was done in recognition of the West Coast National Park's Visual exclusion zone, whilst an application for the erection of a further 16 wind turbines closer to the West Coast National Park is presently being processed. This is an excellent example of such

decisions in the absence of a strategic environmental impact process, which has repeatedly been requested by us. It is also ironic that the impact on surrounding private/ non-government organisation owned nature conservation areas are being ignored by the applicant. At least eight of these formal nature conservation zoned properties are situated within a ten kilometre radius of the proposed wind energy facility. Most of these properties have severe development limitations being imposed on them as a result of their high nature conservation value. A good example is the limitation on the number and architectural design of houses on Jakkalsfontein and Tygerfontein Nature Reserves in order to blend in visually with the surrounding environment. Such limitations require higher than normal building costs whilst the income generating potential of these properties are restricted. Such development conditions are inconsistent with the establishment of imposing industrial type facilities literally a stone throw away.

Kindly note that regional planning guidelines (Guidelines for a Development Strategy for the West Coast Area – Langebaan to Bokpunt, by Dennis Moss and Associates . 1990) which are aimed at protecting the unique character of the Cape West Coast, includes a planning vision of establishing a consolidated nature reserve which extends along the coast from the West Coast National Park to Koeberg, were adopted several years ago by the Western Cape Provincial Planning Department.

It needs to be kept in mind that these endangered to critically endangered ecosystems on the proposed development site and surrounding nature reserves are not able to function solely with the presence of plants. Wildlife, including bats, birds and insects form an integral part of these ecosystems which are likely to be negatively affected beyond the boundaries of the proposed Rhebokfontein and Kerriefontein sites ( the impact of noise on the various wildlife species in this area has not been assessed). Private and Non-Government Owned Nature Reserves require finance to fulfil their primary function. The impact of the proposed wind energy facility on tourism and property investment in these nature reserves as a result of the negative visual influence and potential loss/ reduction of wildlife in such areas, were not assessed. Less tourism and property investment/ returns in nature reserves, means less funding being available to maintain the biodiversity and provide employment in such areas. Also note that the sustainable job creation potential of eco tourism versus wind energy facilities, should have been reflected in this EIA report.

In line with the abovementioned potential erosion of the conservation and tourism value of this and the surrounding area, supporting activities such as the quarrying of material for the construction of wind turbine foundations, did not form part of this FINAL EIA report. We believe that it should have been included. We once again want to make our opposition to blasting /quarrying on Rhebokfontein or nearby sites clear due to the incompatibility thereof in this area and the precedent that will subsequently be created.

The Department of Environmental Affairs (DEA) request in their letter to the applicant (dated 29/3/2011) 'to address and resolve the issues concerning the potential visual effects of the project in consultation with the relevant stakeholders'. We wish to put it on record that subsequently no one-on-one consultation in this regard has taken place between the Jakkalsfontein Homeowners Association and the developer since last mentioned date. The DEA further requested in the abovementioned letter that Heritage Western Cape be provided with a 3D visual presentation. We wish to place it on record that with the exception of two photo simulations of turbines on portions of the proposed wind farm, interested and affected parties were not provided with a 3D visual presentation (as requested in an earlier commenting letter by us), especially as viewed from various angles on severely affected properties, like Jakkalsfontein.

The EIA report (July 2011) state 'excavations into bedrock may affect the geohydrology of an area and can even contaminate groundwater'. Nowhere in the report is it acknowledged that neighbouring properties like !Khwattu, Jakkalsfontein and Tygerfontein abstract their water from the underlying Grootwater aquifer, neither is the vital role that underground water in this area is playing in the ecology of the unique wetland systems in this area which are of high conservation value, being mentioned. It is uncertain whether the applicant approached the Department Water Affairs (DWA) for their comment as requested by DEA. The Jakkalsfontein Homeowners Association kindly request to be provided with a copy of DWA's comments.

We further wish to point out that no specialists attended any of the public meetings to answer questions relating to their studies. No minutes of the public meeting held on 19 July 2011 were made available to Interested and Affected Parties by the closing date for comments (27 July) and subsequent writing of this letter, which place a question mark on the validity of the minutes which will be submitted by the applicant to the authorities.

At the abovementioned meeting the applicant represented by Mr. Tommy Potgieter, indicated that site alternatives were considered by the applicant based on:

- 1) Optimal wind conditions,
- 2) Accessibility to the grid
- 3) Site accessibility

It is clear that environmental factors e.g. visual and biodiversity impacts were not considered in this decision which preceded this EIA process.

Our earlier comments expressed in writing as well as at public meetings appear to be ignored by the consultant. The high conservation and tourism value of this area is downplayed by the consultant despite significant impacts identified by specialists. The amended EIAR contains several inaccuracies, e.g. it is repeatedly being stated that "None of the landowners who stand to be directly affected by the proposed wind energy facility are opposed to the development". This is an example of inaccurate statements in the EIAR as the Jakkalsfontein Homeowners Association amongst others, has clearly expressed their objection to this development on more than one occasion. In terms of the abovementioned statement, it is our understanding that a willing landowner stands to earn an additional lease income of roughly R60 000 per wind turbine per annum. The lack of objection expressed by the agricultural sector is therefore understandable and the above statement should therefore be considered against this background.

The amended EIA report contains conflicting statements e.g. "each turbine would be between 1.8 -2 MW in capacity" and elsewhere it states, 'this draft EIA report are therefore based on a preliminary layout of 3MW turbines'. It is further indicated in the EIAR (July 2011) that 'a final layout of the turbines within the facility would be prepared prior to construction', 'the layout is preliminary and is considered to be 80% accurate', 'recommendations have been made about what should be done when a final layout is available post EIA' 'the exact positioning of the towers is not known at this stage' and 'this EMP will be finalised'. It is questioned how a FINAL EIA report that Interested & Affected parties are required to comment on and approved by the authorities, is not accurate, complete and can be amended post the EIA process?

The signing up of areas up with the Conservation Stewardship Programme appears to be a strategic ploy to soften opposition against this application from the conservation community. This can still be done without a windfarm. In this regard the incompatibility of wind energy facilities in or near areas rich in biodiversity is clearly disregarded by the statement 'all infrastructure should be located at least 30m from the edge of any high sensitivity areas'. In practice, 30 m is likely to be insufficient to protect wind turbines and associated infrastructure from fire damage or being shut down in the event of intense wild fires. Due to the natural character of the proposed development site and surrounding areas, wildfires are a frequent occurrence as fynbos and renosterveld need to burn periodically. The implications of both uncontrollable wildfires and controlled burning practices on this site and surrounding nature reserves, has not been eluded to in the EIAR.

We reiterate our strongest objection to this application in the absence of site alternatives which are legally required as part of an Environmental Impact Assessment. The further failure by the applicant to amongst other perform mining – and traffic impact assessments as part of this EIA process, the lack of information on the economical and biodiversity impacts on surrounding nature reserves, the incomplete, inaccurate and subjective nature of the EIA report, renders this process in our opinion, fatally flawed.

Yours sincerely,

Steyn Marais  
On behalf of the Jakkalsfontein Homeowners Association

cc.  
Sandile Vilakazi: Case officer – National Department of Environmental Affairs  
The Provincial Minister : Department Environmental Affairs and Development Planning: Western Cape  
The Municipal Manager: Swartland Municipality  
The Board of Directors: Jakkalsfontein Homeowners Association

**Jakkalsfontein Homeowners Association (NPC)**  
**REGISTRATION No 1992/007369/08**

**VAT Registration 4250135425**

**From:** collaborator@swartland.org.za  
**Subject:** WIND ENERGY FACILITY  
**Date:** 28 June 2011 2:46:17 PM  
**To:** swjohnston@mweb.co.za

---

Your Reference Number: 934429

We Acknowledge receipt of your letter dated 2011-06-27 regarding Moyeng Energy Proposed Rheboksfontein Wind Energy Facility - Re-release for Draft Scoping Report 27 June 2011 and confirm that the correspondence is being referred to the relevant Department for attention. Reference Number: 934429

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**WEST COAST BIRD CLUB**

The BirdLife South Africa Branch on the West Coast Peninsula

"The best in the west"

From,  
Keith Harrison,  
P.O. Box. 1040, Tel. 022 – 7133026.  
Vredenburg, Email. : keithhbharrison@lando.co.za  
7380.

To,  
Shawn Johnston of Sustainable Futures ZA,  
P.O. Box 749, Tel. 083 325 9965,  
Rondebosch, Email. swjohnston@mweb.co.za  
Cape Town, 7701.

2<sup>nd</sup> August 2011.

Ref. Revised draft EIAR for Proposed Rheboksfontein Wind Energy Facility and Associated Infrastructure on Site near Darling, Western Cape DEA Ref. No. 12/12/20/1582.

Dear Shawn Johnston,

I have just received a CD of the project from the CWCBR and thank you for the opportunity to comment.

The West Coast Bird Club (WCBC) supports Renewable Energy Projects providing that the project has minimum impact upon avifauna and the environment.

Then WCBC supports the reduction in number of turbines from 80 to 48 providing that the recommendations by the Avian Impact Assessor (AIA) are followed.

### General Comments

1. Lighting of site, strobe lighting of the turbines is noted but there is no mention of permanent site lighting at ground level, which will attract insects, night flying birds and bats. All outside lighting should be motion activated and be coloured from a source directing the beam vertically downwards.
2. Colour marking, the AIA mentions colouring one of turbine blade to reduce chance of collisions, but not in the DEIAR, probably due to making them more visible to humans? However by research main flight ways could be established and if any turbines fall in this zone, they could have a stripe painted on one blade.

West Coast Bird Club  
PO Box 1404,  
Vredenburg  
7380

Page.2

No mention was made to the probability of birds colliding with the towers at ground level, there is an international recommendation that the bottom 5 metres of the tower be painted a different colour.

3. Power line to Dassenberg sub-station, the proposal of a 28 kms. line, will this be subject to a separate EIA? Or be treated as the Eskom servitude it would follow? In either case an estimation of potential bird collisions should be made.
4. Bats, it is recognized that bats are only active in winds below 5 metres/second. Therefore a condition for this site should be that there should be no start up or running of turbines in wind speeds below 5 metres/second during the activity periods of bats.
5. In section 6.4 of Appendix H there is a reference to the Berg River !BA being 6 kms. from the site, it is a lot further.
6. Hardened surfaces. There are two lay down areas mentioned at each turbine 40 X 40 metres and in section 2.7.4, 60 X 40 metres, which one is correct? The DEIAR states that these are for construction together with the 13-metre track for the crane. Will these be permanent and remain for maintenance of each turbine during the life of the project? Or will they be rehabilitated. Being leveled, compacted and impervious both the track and lay down areas will lead to storm water problems, because on the West Coast, although a low rainfall area, when rain comes it is in short heavy bursts causing rapid runoff. A comprehensive storm water management system will be required with retaining ponds etc.
7. Vehicles, over the long construction period and the necessity to bring and remove materials there will be a vast amount of heavy vehicle movements which will lead to damage of the local road infrastructure, all vehicles in use by contractors should be registered with the local Municipality in order that a portion of the license fee would be used to defray maintenance costs.
8. Safety, wind turbines are recognized as dangerous projects see Caithness Wind Farm Forum 2011, ([www.caithnesswindfarms.co.za.uk](http://www.caithnesswindfarms.co.za.uk)) for statistics. Compatible Safety and Disaster Management procedures must be in place.  
It should be noted that fires result from gear oil failures, with the West Coast being prone to fire risk.  
Also concern is expressed about the use of rare earth minerals in the magnets of the generator, which are a pollution risk.

Yours sincerely,

Keith Harrison  
(West Coast Bird Club – Conservation.)  
Sent by Email 02/08/2011.

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7380

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[BLSA NPO Reg. No. 001298NPO](#)

**WESKUS DISTRIKSMUNISIPALITEIT  
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:  
Address all correspondence  
to:

**MUNISIPALE BESTUURDER/  
MUNICIPAL MANAGER**

Navrae/Enquiries : 13/2/12/1/1  
Verw.Nr./Ref. No.: Doretha Kotze



Posbus / P O Box 242  
MOORREESBURG, 7310

Telefoon/Phone (022) 433 8400  
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E-Mail Adres/Address :  
westcoastdm@wcdm.co.za

26 July 2011

**ATTENTION: RAVISHA AJODHAPERSADH**

Savannah Environmental (Pty) Ltd  
PO Box 148  
SUNNINGHILL  
2157

Sir

**PROPOSED RHEBOKSFONTEIN WIND ENERGY FACILITY: DRAFT EIA REPORT**

1. I refer to your letter dated 24 June 2011 and the accompanying Draft Environmental Impact Assessment Report for the above-mentioned facility.
2. The West Coast District Municipality is not in favour of the proposal. Its position on the proposal has been stated in previous correspondence sent to the EAP during the Environmental Process.
3. The West Coast District Municipality considers the visual impact of the project on the R27, Yzerfontein and other developments along the coast, as well as the West Coast National Park, unacceptable and has communicated this to the EAP. The Visual Impact Assessment supports this view.
4. The following needs to be clarified:
  - 4.1 On page 6 of the Main Report it is stated that the facility will have a generating capacity of up to 240 MW. On the same page it is stated that the electricity will be generated by up to 80 wind turbines producing between 1,8 MW and 2 MW. However, further down on page 6 it is stated that ***“The generating capacity of the facility will be dictated by the choice of turbine, which will be determined by the on-site conditions and the local wind regime following extensive on-site monitoring which is currently underway. The capacity of the actual turbines to be used for the project is therefore not certain at this***


2/...

***point, but is expected to be up to 3 MW per turbine. All analyses of potential project impacts presented in this draft EIA Report are therefore based on a preliminary layout of 3 MW turbines, as provided by Moyeng Energy.*** This being the case, it is questioned why 1,8 MW to 2 MW turbines are mentioned numerous times in the Report (inter alia, pages 7, 14 and 20 of the Main Report). However, in the EMP (page 4) reference is made to 1,8 MW to 3 MW turbines. This discrepancy is questioned.

4.2 In the Visual Impact Assessment the height of turbines are given as 82 meters (turbine hub height) plus 55 metres for blades, giving a blade tip height of 137 m (paragraph 1, page 6 of the Visual Impact Assessment). However, it is well known that 3 MW turbines can have a total height of up to 180 m. The difference in height of 43 metres will significantly influence the outcome of the Visual Impact Assessment. The West Coast District Municipality is concerned that 3 MW turbines may be substantially higher (up to 180 m) than the 137 m stated in the Visual Impact Assessment and may thus have a significantly greater visual impact than those assessed in the Visual Impact Assessment.

5. Although the West Coast District Municipality is not in favour of the establishment of a wind energy facility in this particular location, it would rather support the extension of the existing Darling Demonstration Wind Farm consisting of fewer turbines and thus having a lesser impact on this important ecological, agricultural and tourism area.

Yours faithfully



MUNICIPAL MANAGER  
/dk

23 June 2011

Heritage Western Cape  
Private Bag X9067  
Cape Town  
8001

DEA Ref. No: 12/12/20/1582  
ATT: Jenna Levin

RE: Rheboksfontein Wind Energy Facility, near Darling

Dears Jenna

Savannah Environmental acknowledges receipt of Heritage Western Cape's letter (dated 03 November 2010), however received via email on 08 February 2011 for the above-mentioned project. Firstly, it is important to point out that HWC's comment on the propose project (received in February 2011), were received more than two months after the first public review period for the Draft EIA report had ended (i.e. September 2010). Therefore their issues were not documented as part of the EIA process, due to late submission of comments. The final EIA report was submitted to DEA in November 2010. Thereafter in March 2011, DEA have requested revision of the EIA and for Savannah Environmental to address HWC's issues. .

Savannah Environmental would like to respond to the matters raised by HWC on the Rheboksfontein project as follows (text in italics is the comment received by HWC), and text in blue is Savannah Environmental's response:

- 1. The site lies between 4 and 13 km from the coast. There is a high concentration of heritage resources on the proposed site including clusters of large trees and treelines, various farm structures as well as widely scattered archaeological material.*

Comment noted on the proximity of the site to the coast. The layout of the facility has been revised (see Revised Draft EIA Report of June 2011, currently out for public review), and no turbines / infrastructure will occur on any treelines, thereby eliminating this impact altogether on the site. The presence of heritage resources and how to deal with finds / destruction / permitting from HWC is dealt with in the EMP, on the procedure to be followed by the Environmental Control Officer / developer.

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DIRECTORS: KM JODAS • J THOMAS • M MATSABU  
COMPANY REGISTRATION NO.: 2006/000127/01  
VAT REGISTRATION NO.: 4780226736

2. *A significant Stone Age site was identified (Rheboksfontein 1).*

The Heritage Impact Assessment discussed Rheboksfontein 1 (heritage site), based on the revised layout, no turbines / infrastructure will occur on this heritage site / any others identified on the sensitivity map, thereby reducing the impact on these features to a very low probability

3. This proposal and the proposed wind farm on the adjacent property, Kerrifontein (see item 11.19), will result in a high negative cumulative visual impact.

Comment noted.

4. The proposal is adjacent to significant cultural landscapes such as the Tienie Versveld Wild Flower Reserve and the West Coast Road (R27).

No turbines occur in this area - (i.e. within 50m from within 50m of the southern boundary of the Tienie Versveld Wildflower Reserve). A buffer has been placed on the R27 main road (2 kilometre buffer).

5. The surrounding landscape has a very low absorption capacity and the turbines will be visible from significant distances. The report indicates that it is difficult to mitigate the visual impacts of the proposal. Scenic route, historic homesteads, landscape and natural environment will be negatively impacted.

As mentioned above, the scenic route (R27) has a 2km buffer around it, however the facility will still be visible between a 5km-10km distance. The presence of heritage resources and how to deal with finds / destruction / permitting from HWC is dealt with in the EMP, on the procedure to be followed by the Environmental Control Officer / developer (apart from Rheboksfontein 1 - as no turbines occur at this heritage site).

6. The reports had been prepared in isolation and consequently the conclusions were not integrated.

The HIA report is integrated into the EIA main report / assessment, refer to Section 5.7, 6.6, 7.1 and 7.3 for specific information and assessment. It appears that the HIA report, has been read in isolation from the EIA main report consolidated by the EAP - Savannah Environmental.

7. The Committee resolved not to accept the consultant's report and requested that a 3D visual presentation of the proposal be presented to the Committee to make an informed decision. The 3D presentation needs to spatialise the landscape resources, the visual consideration (from both near and far), the scenic route and the anticipated cumulative effects of the proposal.

Visual simulations (photo montages) are available for this project and contained within the Visual Impact Assessment Report (Appendix K), and this should be sufficient for use. Note that a 3D visual presentation does not exist for this project.

8. The archaeological test excavations and subsequent mitigation recommended by the archaeological consultant must be carried out for Rheboksfontein 1 Site, unless this turbine can be shifted to create a 100m buffer, or is omitted entirely. It should be ensured that no secondary impacts to heritage resources occur as a result of large trucks and cranes accessing the project area.

The Environmental Management Plan addresses this issue, see Appendix (Q), where the EMP states that a heritage walk through survey must be undertaken on the site, prior to construction, and that, if requires, permits must be obtained from HWC for their removal. Based on the revised layout, it is fair to state that no turbines occur on / within 100m from Rheboksfontein 1.

Should you have any queries kindly contact us.



Savannah Environmental

23 June 2011

P.O. Box  
45032  
Claremont  
7735

ATT: Butch Rice (on behalf of the Jakkalsfontein Homeowners Association)

**Rheboksfontein Wind Energy Facility, near Darling**  
**DEA Ref. No: 12/12/20/1582**

Dear Mr Rice

Your various email correspondences between 08-16 June 2011 to Savannah Environmental refers. We acknowledge receipt of your email correspondence. Savannah Environmental would like to respond to the matters raised by the Jakkalsfontein Homeowners Association on the Rheboksfontein project, our responses are as follows (text in italics is the comment received by Mr Rice), and text in blue is Savannah Environmental's response:

1. *Having studied the EIA, I find no reference to the fact that there are approximately 100 houses in Jakkalsfontein.*

The Social Impact Assessment does refer to Jakkalsfontien (section 3.3.2) and also in the assessment section of the report. Section 3.3.2 states "...A number of residential estates are located to the south of Yzerfontein. These include...Jakkalsfontein Estate and Jakkalsfontein.... Jakkalsfontein Estate... consists of approximately 100 residential units located in a private nature reserve. Units are located in linear clusters set back behind coastal dunes. The Estate land consists of approximately 1700 ha of restored coastal fynbos, and offers unobstructed views from the residential units onto the Darling Hills...."

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DIRECTORS: KM JODAS • J THOMAS • M MATSABU  
COMPANY REGISTRATION NO.: 2006/000127/01  
VAT REGISTRATION NO.: 4780226736

- 2. This would make us the largest community affected by the proposed project, both in terms of visual impact, and impact on our collective investment, which runs into several hundreds of millions of rands. The proposed wind turbines will be visible from each and every house at Jakkalsfontein. Bearing in mind that Jakkalsfontein is a private nature reserve, and that homeowners buy into the reserve because they value tranquillity and an unspoilt environment, the impact of the proposed project is obvious.*

The SIA report does discuss the high scenic value of the region as well as the sense of place in the area. The Australian National Wind Farm Development Guidelines (Draft, July 2010) are cited in the SIA and indicate that the impact of a wind farm on a landscape is not necessarily just visual - other 'values' can also be affected. Community values and perceptions of landscape may include associations, memories, knowledge and experiences or other cultural or natural values. The VIA and SIA state that the turbines will have a visual impact and, in so doing, impact on the rural sense of the place of the area and the landscape.

- 3. We would suffer significant financial damage if the proposed project were to proceed as planned.*

The claim that financial damage to properties will occur will require a property evaluator to validate such a claim and proof of financial damage from the wind energy facility will need to be provided. This is a legal matter which is considered to fall outside of the scope of the EIA.

- 4. Jakkalsfontein also has one of the highest densities of Black Harriers in Africa. Being situated opposite the Rhebokfontein project, the probability of Harrier mortalities is relatively high, as the proposed project is situated in their foraging region. This would impact on our enjoyment of our reserve, should our iconic Black Harrier population be diminished in size, or simply move away.*

The Black Harrier features prominently in the avifauna report, with a specific reference made to the known nest sites at Jakkalsfontein and Rondeberg (note that, according to the avifauna specialist, the claim that Jakkalsfontein supports the highest density of Black Harriers in the Western Cape is not accurate). The EIA report does do an assessment of bird impacts. A number of turbines of potential concern have been highlighted within the site itself and further monitoring and investigation has been recommended in these areas in order to ensure impacts on avifauna are minimised.

- 5. I have already drawn the attention of the national Department of Environmental Affairs to the fact that neither the size of the Jakkalsfontein community, nor the impact on our investment appears to be included in your EIA. Although Jakkalsfontein is acknowledged to be a private nature reserve, there is nothing that I can see that discusses the impact of the proposed project on our community per se.*

In summary, the allegation that the EIA report does not refer to Jakkalsfontein estate is incorrect. Furthermore, direct assessment of the wind energy facility on Jakkalsfontein is made in the main EIA document, and SIA and VIA reports, despite it not being possible to quantify visual impacts in monetary terms, which is beyond the scope of the EIA.

**Savannah Environmental's Responses to queries made by Mr Rice to DEA during May – June 2011:**

6. *Guy Preston, a good friend of mine, suggested I contact you (DEA contact person). I write to you (DEA) because of my concern about the approval of wind farms in the Western Cape, and would like more clarity on the requirements of the EIAs. I have noted, with some concern, the recent approval of the wind farm at Paternoster, an acknowledged tourist destination. There is a lack of data on bat populations in South Africa currently to validate the impacts on bats. However potential impacts on bats is included in the EIA report (Chapter 6) and is considered to be of low significance. The avifauna study does state the range of bird species and possible migratory paths in the study area, subject to pre-construction and long-term bird monitoring.*
7. *In addition the bat population is going to be hammered.*  
There is a lack of data on bat populations in South Africa currently to validate the impacts on bats. However potential impacts on bats is included in the EIA report (Chapter 6) and is considered to be of low significance.
8. *Noise and light pollution will have a significant impact on our lives at Jakkalsfontein, a private nature reserve facing the Darling Hills where the installation is planned.*  
Noise impacts on Jakkalsfontein itself from the wind turbines are negligible, as it occurs further than 1 kilometre away from the closest wind turbine (as per the original layout of 80 turbines as well as the revised layout consisting of 48 wind turbines) and noise modelling that was done (Refer to Appendix M for the Noise specialist report). Lighting for the facility will be minimal. The impacts associated with lighting are considered within the visual impact assessment (refer to Appendix K).
9. *I notice that the major shareholders in Moyeng Energy are Investec, and the French utility company GDF Suez, companies who clearly have no long term interest in our environment. What is of most concern about wind farms is their high cost and extremely low efficiency. According to the John Muir Trust, in the UK, we can expect no more than about a quarter of energy generating capacity to be delivered. On the face of it, installation of these wind turbines is going to have a significant impact on our environment, and our tourism efforts in the Western Cape. In addition it is going to cost plenty.*  
The developer (Moyeng Energy) intend to develop, own and operate the facility and therefore do have a long term interest in the project . As the developer and operator

of the facility, they will be legally bound to the conditions of any Environmental Authorisation issued for the project. In addition, they will be bound to ensure minimal environmental impact by requirements of the National Environmental Management Act and its requirement of the "duty of care" by developers for the environment.

*10. I seem to remember reading recently that the requirements of the EIAs has been toughened up. Is this reality? And where do we stand with the development at Rheboksfontein, opposite Jakkalsfontein? As a very concerned conservationist, birder, and Jakkalsfontein resident, I hope you can be of assistance. I would appreciate a response to this letter for circulation to homeowners.*

The new EIA Regulations of June 2011 were promulgated to streamline the EIA process and activities that require / don't require authorisation. The legal requirements in terms of the process have, however, not changed. Savannah Environmental has attached the DEA Companion Guideline for Mr Rice's perusal in the letter from Savannah Environmental and hope this can be of assistance to Mr Rice

*11. I have now done some more research, and realise that national government has, effectively, given the green light to wind farms. There is therefore little point in debating the effectiveness of wind farms as an energy source. However, what remains of relevance is the siting of wind farms. My letter is about the proposed Rheboksfontein Wind Energy facility. I have been through the EIA drawn up by Savannah Environmental. There appears to be a striking omission from the report. Although Jakkalsfontein is referred to, and it acknowledged being a private nature reserve, nowhere in the report does it mention the fact that there are approximately 100 home owners at Jakkalsfontein, all of whom will be directly affected by the proposed development. The wind turbines will be visible from each and every house at Jakkalsfontein. This makes us the largest community to be affected by the visual impact of the wind turbines.*

The Social Impact Assessment does refer to Jakkalsfontien (section 3.3.2) and also in the assessment section of the report. Section 3.3.2 states "...A number of residential estates are located to the south of Yzerfontein. These include...Jakkalsfontein Estate and Jakkalsfontein.... Jakkalsfontein Estate... consists of approximately 100 residential units located in a private nature reserve. Units are located in linear clusters set back behind coastal dunes. The Estate land consists of approximately 1700 ha of restored coastal fynbos, and offers unobstructed views from the residential units onto the Darling Hills....

*12. Bearing in mind that Jakkalsfontein is a private nature reserve with the highest conservation ethic, having an experienced conservator in charge of the reserve; homeowners buy at Jakkalsfontein, a 1700 hectare reserve, because of the importance of a relatively unsullied environment. Houses are restricted to small plots, so as to minimise our footprint, and homeowners have voted against any further houses being built, even though our zoning allows for another 50 houses to be built.*

*One of the pluses of Jakkalsfontein is the view of the unspoilt Darling Hills, precisely where it is proposed to erect 80 wind turbines.*

The SIA report does discuss the high scenic value of the region as well as the sense of place in the area. The Australian National Wind Farm Development Guidelines (Draft, July 2010) are cited in the SIA and indicate that the impact of a wind farm on a landscape is not necessarily just visual - other 'values' can also be affected. Community values and perceptions of landscape may include associations, memories, knowledge and experiences or other cultural or natural values. The VIA and SIA state that the turbines will have a visual impact and, in so doing, impact on the rural sense of the place of the area and the landscape.

- 13. We are home to five breeding pairs of Black Harriers, a Red List species, acknowledged as such in the EIA. This is the highest density of Black Harriers in the Western Cape. We have an extensive alien clearing program, providing labour opportunities to the Darling population.*

The Black Harrier features prominently in the avifauna report, with a specific reference made to the known nest sites at Jakkalsfontein and Rondeberg (note that, according to the avifauna specialist, the claim that Jakkalsfontein supports the highest density of Black Harriers in the Western Cape is not accurate). The EIA report does do an assessment of bird impacts. A number of turbines of potential concern have been highlighted within the site itself and further monitoring and investigation has been recommended in these areas in order to ensure impacts on avifauna are minimised.

- 14. We have invested in game fencing on our border with the R27, with more fencing planned for the near future, so as to secure our antelope population.*

Jakkalsfontein Private Nature Reserve is located some 3km to the south west of the proposed wind energy facility. The fencing itself and security of antelope / game on Jakkalsfontein will not be impact by the proposed wind energy facility, as Jakkalsfontein is not directly adjacent to the wind energy facility (in fact the R27 main road (unfenced) separates the wind energy facility from Jakkalsfontein).

- 15. If the siting of the wind turbines proceeds as planned, it would have a devastating impact on the value of our collective investment, which conservatively amounts to hundreds of millions of rands. It would also affect our enjoyment of properties that were bought so as to escape visual pollution, and light pollution. There are no street lights at Jakkalsfontein. In a nutshell, the siting of the wind turbines in the Rhebokfontein project, would affect Jakkalsfontein residents more than any other community. This fact has not been included in the relevant EIA.*

The claim that financial damage to properties will occur will require a property evaluator to validate such a claim and proof of financial damage from the wind energy facility will needed to be provided, and is a legal matter outside of the scope of the EIA, and not based on any factual evidence, therefore it is not included in the EIA (note that the EIA is required to be factual and validated, if possible).

16. *The Jakkalsfontein Homeowners Association has registered a formal objection, and should already have been registered as an interested and affected party. I trust that your department (DEA) has their written objection prepared in response to the draft EIA.*

Objections from Jakkalsfontein Homeowners Association are included in the EIA process, as communities have a right to participate in the process. The estate manager has been registered on the project since early in the process and attended the public meeting held during the review period of the draft EIA Report in September 2010.

17. *It is only now, on scrutiny of the final EIA, that we have realised the oversight of Savannah Environmental, in ignoring the size of the Jakkalsfontein community, and the extent of the impact that the proposed development will have on our community. We must register our protest in the strongest possible terms against the development, in order to protect our investment, both financial and environmental. We remain keenly interested in the progress of the application, and would appreciate any updates you could supply.*

The Social Impact Assessment does refer to Jakkalsfontein (section 3.3.2) and also in the assessment section of the report. Section 3.3.2 states "...A number of residential estates are located to the south of Yzerfontein. These include...Jakkalsfontein Estate and Jakkalsfontein.... Jakkalsfontein Estate... consists of approximately 100 residential units located in a private nature reserve. Units are located in linear clusters set back behind coastal dunes. The Estate land consists of approximately 1700 ha of restored coastal fynbos, and offers unobstructed views from the residential units onto the Darling Hills...The allegation that the EIA report does not refer to Jakkalsfontein estate is incorrect. Furthermore, direct assessment of the wind energy facility on Jakkalsfontein is made in the EIA / SIA report, despite it not being possible to quantify visual impacts in monetary terms, which is beyond the scope of the EIA.

In addition to this letter, the developer and the EIA team will be available to meet with the JKA representatives, as we are planning to have additional focus group meetings between 18-19 July 2011.

Should you have any queries kindly contact us.



Ravisha Ajodhapersadh  
Environmental Assessment Practitioner

# JAKKALSFONTEIN



## NATURE RESERVE

**PRIVATE BAG X2 • DARLING • SOUTH AFRICA • 7345 • WEST COAST ROAD (R27) •  
TEL +27 22 409 2911 • FAX +27 22 409 2104  
email admin@jkf.co.za`**

Mr. S. Johnston  
Sustainable Futures ZA  
P.O. Box 749  
Rondebosch  
7701

15 June 2011

Dear Shawn,

**PROPOSED RHEBOSFONTEIN WIND ENERGY FACILITY AND ASSOCIATED  
INFRASTRUCTURE ON A SITE NEAR DARLING, WESTERN CAPE PROVINCE  
DEA Ref. No. 12/12/20/1582**

**UPDATE ON THE EIA PROCESS AND WAY FORWARD**

Your attached letter dated 5 June 2011 under the abovementioned heading refers. The Jakkalsfontein Homeowners Association take note that the EIA report was rejected by the Department Environmental Affairs (DEA) during March 2011. We further note with surprise and concern that according to your letter the consideration of alternative sites is not included in the additional information requested by the DEA. Please be reminded that Jakkalsfontein Homeowners Association repeatedly requested the consideration of alternative sites at your earlier public meetings as well as in writing in our earlier objection to this application.

As the seriousness of our concern in this regard appears to be ignored, we would like to use this opportunity to focus your attention on the following (these comments are submitted in support of the rights afforded to interested and affected parties (I&APs) as provided in the National Environmental Management Act (Act 107 of 1998)) :

1. Section 1.1 of the Draft Environmental Impact Assessment (DEIA) deals with the need and desirability for developing the Wind Energy Facility. The need and desirability of renewable energy is not in question and is well understood. As stated in Section 2.2 of Guideline 5, "In order to ensure that the assessment of alternatives is appropriate, it is important to develop a clear definition of the need and desirability for the proposed activity". The need and desirability of renewable energy in terms of national need is clearly documented in numerous sources. However, the need or desirability of this specific project, on this specific site has neither been demonstrated nor documented. The report goes into great detail with regard to the desirability of

the wind energy in terms of its projected overall contribution to South Africa. In terms of the DEAT (2006) Guideline 5, it states that "This definition of need and desirability will help to set the context of the activity (with regard to the specific site) and enable the determination of appropriate alternatives to the proposed activity. It will also help the competent authority to assess the implications of the different alternatives, including the reasonableness of the no-go alternative, in a context of the risks and benefits of the proposed activity" with regard to this specific site. Based on the fact the proposed Rheboksfontein Wind Energy Facility (WEF) is site specific, the report must detail the need and desirability associated with this specific site – it fails to do so.

2. The insertion into the report of the following paragraph, "Currently, the majority of power in the Western Cape Province is generated by coal-fired power stations situated in the provinces of Limpopo and Mpumalanga and the Provinces have limited power generation. A project of this nature will create needed energy generation capability in the region" is designed to mislead the authorities and I&APs. The power generating capabilities of Koeberg Nuclear facility on the West Coast is conveniently omitted.

3. Section 1.1 (pg. 3) of the DEIA states "Extensive pre-feasibility analyses, site identification processes and a regional assessment have been undertaken by Moyeng Energy and their wind engineers Windlab in identifying potentially suitable sites for wind energy development". In terms of the DEAT (2006) Guideline 5<sup>1</sup>: the process as described is in complete contravention and non-compliant with the regulations and requirements of the National Environmental Management Act (Act 107 of 1998). The statement, "has been undertaken by Moyeng" is in violation of the regulations. In terms of Chapter 5 of NEMA<sup>2</sup> General requirements for EAP's, states that an EAP appointed (Moyeng Energy is not the EAP) in terms of regulation 17 (1) must - a) be independent e) take into account, to the extent possible, the matters listed in regulation 8(b) when preparing the application and any report (own emphasis) relating to the application:

Based on the facts as stated, the proponent has undertaken the studies to determine the specific site, and thus renders the entire EIA process fatally flawed. In addition, and in support that the process is flawed, these feasibility studies and analyses have not been made available to interested and affected parties to test, interrogate or assess the veracity and quality of information. Regulation 8 (b) states, amongst others, the following:

- b) take into account all relevant factors, including –
- v) any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment;
- ix) any guidelines that are relevant to the application.

The DEIR in section 2.2.2 Regional Assessment on page 12 and 13 states that Savannah Environmental and MetroGIS undertook a Regional Assessment on behalf of Moyeng Energy. However the purpose of this study is stated as, "*The purpose of the regional assessment was to confirm the appropriateness of the identified site near Darling for development (from an environmental perspective), and not to undertake detailed analyses or field surveys*". The key factor within the statement is the words "the identified site". This clearly bears reference to only one site being identified, and furthermore no detail with regard to who identified the site is provided. It is

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<sup>1</sup> Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental Management Guideline Series, Department of Environmental Affairs & Tourism (DEAT), Pretoria

<sup>2</sup> NEMA □ Chapter 3: Applications for Environmental Authorisations, Part 1: General Matters, Section 18,

clearly evidenced that Moyeng Energy undertook the selection of site alternatives, which renders this process and EIA fatally flawed and in contravention of NEMA.

The selection of site alternatives with regard to this specific application must be undertaken and motivated by the appointed EAP and not by the proponent. It must be added that it should be regarded as extremely irregular that the EAP has not advocated alternative sites in the broader area as required by sub-paragraph (v). We request reasons as to why Moyeng Energy or the specialists are not advocating alternative sites. Failure to take these aspects into account and to provide adequate reasoning should be construed as a dereliction of duty.

4. Section 2.3.1 The 'do-nothing' alternative (Pg. 16): The statement, "*the do-nothing alternative will not assist the South African government in reaching the set targets for renewable energy, nor will it assist in supplying the increasing electricity demand within the country. In addition the Western Cape power supply will be deprived of an opportunity to benefit from the additional generated power being evacuated directly into the Provinces grid.*" is a complete and iniquitous attempt to mislead the competent authority and Interested and Affected parties. It is quite possible to relocate or construct this proposed development at an alternative and more appropriate site.

*"The 'do nothing' alternative is, therefore, not a preferred alternative".* It is a sad indictment of the EIA process where the needs of the proponent are promoted by supposedly independent and objectively minded consultants at the expense of the environment and communities who will be negatively impacted.

5. Chapter 1 of NEMA<sup>3</sup> Principles in Sub-sections,

(2) Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.

(3) Development must be socially, environmentally and economically sustainable.

(4) (a) Sustainable development requires the consideration of all relevant factors including the following:

(i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied:

(ii) That pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

(b) Environmental management must be integrated. Acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.

6. It is clearly evident that only technical considerations have been taken into account with regard to site selection. This clearly violates the requirement that development must be socially, environmentally and economically sustainable. Furthermore; in Guideline 5 Section 2.3<sup>4</sup>, it clearly states; "I&AP's must be provided with an opportunity of providing inputs into the process (own emphasis) of formulating

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<sup>3</sup> National Environmental Management Act (Act 107 of 1998), Principles, Section 2,

<sup>4</sup> The Selection of Alternatives

alternatives. Once a full range (own emphasis) of potential alternatives has been identified, the alternatives that could be reasonable and feasible should be formulated as activity alternatives for further consideration during the basic assessment or scoping and EIA process". At no stage have I&AP's been involved in the selection of alternatives related to this project. I&AP's have only been afforded opportunity to comment on the alternatives as proposed by Moyeng Energy and have not been involved in the selection of alternatives as provided by the regulations.

Furthermore, as provided in Guideline 5, the comparative assessment should at least include the following aspects (that clearly have not been undertaken):

- capital and operating costs;
- direct, indirect and cumulative impacts;
- mitigation measures;
- physical, legal or institutional constraints; and
- compliance with policy and legal requirements.

At no stage have these aspects been assessed by I&AP's.

7. The Department Environmental Affairs and Development Planning: Western Cape recently announced a policy of consolidating Wind Energy Facilities (WEF's) to minimize the visual and ecological impact thereof on the landscape. With this in mind, information should be provided as to the suitability of consolidating additional WEF's on and around the Rheboksfontein and alternative study sites.

## **Conclusion**

i) The fact that the project consultants are not strongly advocating alternative sites is an indication of the proponents influence in this process and therefore the objectivity and independence of EIA needs to be questioned. As has been shown, the assessment of alternatives does not comply with the principles of NEMA, or the regulations.

ii) That alternative project sites be determined and assessed in a competent and objective manner without the influence of the project proponent that take into account the principles of NEMA.

iii) It is therefore our contention that the competent authority, based on current information, should request that alternative sites be identified. Failing the provision of such information to the authorities and I&APs, will render this EIA fatally flawed.

We trust that the above will receive your urgent attention.

Yours sincerely,

Steyn Marais  
On behalf of the Jakkalsfontein Homeowners Association

cc. The Director: Department Environmental Affairs and Development Planning: Western Cape  
Sandile Vilakazi: Case officer – National Department of Environmental Affairs  
The Municipal Manager: Swartland Municipality  
The Board of Directors: Jakkalsfontein Homeowners Association

**From:** Butch Rice [mailto:mwbutchr@mweb.co.za]  
**Sent:** 23 May 2011 02:33 PM  
**To:** joanne@savannahsa.com  
**Cc:** swjohnston@mweb.co.za; Steyn Marais  
**Subject:** Rheboksfontein Wind Energy Project

I am writing this letter to bring to your attention what appears to be a significant oversight in the EIA for the Rheboksfontein Project. I write in my capacity as a resident of Jakkalsfontein, and on behalf of the Jakkalsfontein Homeowners Association ( JHA). The JHA has already lodged a written objection to the proposed project. This letter should be seen as an addendum to the objection already lodged.

Having studied the EIA, I find no reference to the fact that there are approximately 100 houses in Jakkalsfontein. This would make us the largest community affected by the proposed project, both in terms of visual impact, and impact on our collective investment, which runs into several hundreds of millions of rands. The proposed wind turbines will be visible from each and every house at Jakkalsfontein. Bearing in mind that Jakkalsfontein is a private nature reserve, and that homeowners buy into the reserve because they value tranquillity and an unspoilt environment, the impact of the proposed project is obvious. We would suffer significant financial damage if the proposed project were to proceed as planned.

Jakkalsfontein also has one of the highest densities of Black Harriers in Africa. Being situated opposite the Rheboksfontein project, the probability of Harrier mortalities is relatively high, as the proposed project is situated in their foraging region. This would impact on our enjoyment of our reserve, should our iconic Black Harrier population be diminished in size, or simply move away.

I have already drawn the attention of the national Department of Environmental Affairs to the fact that neither the size of the Jakkalsfontein community, nor the impact on our investment appears to be included in your EIA. Although Jakkalsfontein is acknowledged to be a private nature reserve, there is nothing that I can see that discusses the impact of the proposed project on our community per se.

i would appreciate a response to this letter for circulation to homeowners.

Many thanks

Butch Rice

Jakkalsfontein.

---

**From:** Coenrad Agenbach [mailto:CAgenbach@environment.gov.za]  
**Sent:** 08 June 2011 08:18 AM  
**To:** Karen Jodas  
**Subject:** Fwd: Re: Rheboksfontein  
**Importance:** High

Dear Karen

Please find attached comments on the Rheboksfontein application. Please treat this as comments and provide a response.

Thanks

Coenrad Agenbach  
Deputy Director: Environmental Impact Evaluation: Special Projects  
Department of Environmental Affairs  
Private Bag X447  
Pretoria  
0001  
South Africa

Telephone: + 27 12 310 3711  
Fax: + 27 12 320 7539

>>> Dumisane Mthembu 5/23/2011 9:25 AM >>>  
Can you please follow up on this

Regards

Dumisani Mthembu  
Director: Environmental Impact Evaluation  
Department of Environmental Affairs  
Tel: 012 310 3230  
Fax: 012 320 5014  
Email: [dmthembu@environment.gov.za](mailto:dmthembu@environment.gov.za)

>>> Ishaam Abader 5/17/2011 11:20 AM >>>  
Dear Sir

The relevant managers dealing with this matter are copied on this mail and will be able to give you an update on progress.

Kind regards

Ishaam Abader  
Deputy Director General: Environmental Quality and Protection  
Tel: (012) 310 3391  
Fax: (012) 322 1936  
[labader@environment.gov.za](mailto:labader@environment.gov.za)  
[www.environment.gov.za](http://www.environment.gov.za)

>>> "Butch Rice" <[mwbutchr@mweb.co.za](mailto:mwbutchr@mweb.co.za)> 5/16/2011 10:11 AM >>>

Dear Mr Abader,

Thank you for your previous response. I have now done some more research, and realise that national government has, effectively, given the green light to wind farms. There is therefore little point in debating the effectiveness of wind farms as an energy source. However, what remains of relevance is the siting of wind farms.

My letter is about the proposed Rheboksfontein Wind Energy facility. I have been through the EIA drawn up by Savannah Environmental. There appears to be a striking omission from the report.

Although Jakkalsfontein is referred to, and it acknowledged to be a private nature reserve, nowhere in the report does it mention the fact that there are approximately 100 home owners at Jakkalsfontein, all of whom will be directly affected by the proposed development. The wind turbines will be visible from each and every house at Jakkalsfontein. This makes us the largest community to be affected by the visual impact of the wind turbines.

Bearing in mind that Jakkalsfontein is a private nature reserve with the highest conservation ethic, having an experienced conservator in charge of the reserve, homeowners buy at Jakkalsfontein, a 1700 hectare reserve, because of the importance of a relatively unsullied environment. Houses are restricted to small plots, so as to minimise our footprint, and homeowners have voted against any further houses being built, even though our zoning allows for another 50 houses to be built. One of the pluses of Jakkalsfontein is the view of the unspoilt Darling Hills, precisely where it is proposed to erect 80 wind turbines.

We are home to five breeding pairs of Black Harriers, a Red List species, acknowledged as such in the EIA. This is the highest density of Black Harriers in the Western Cape. We have an extensive alien clearing program, providing labour opportunities to the Darling population. We have invested in game fencing on our border with the R27, with more fencing planned for the near future, so as to secure our antelope population.

If the siting of the wind turbines proceeds as planned, it would have a devastating impact on the value of our collective investment, which conservatively amounts to hundreds of millions of rands. It would also affect our enjoyment of properties that were bought so as to escape visual pollution, and light pollution. There are no street lights at Jakkalsfontein.

In a nutshell, the siting of the wind turbines in the Rheboksfontein project, would affect Jakkalsfontein residents more than any other community. This fact has not been included in the relevant EIA. The Jakkalsfontein Homeowners Association has registered a formal objection, and should already have been registered as an interested and affected party. I trust that your department has their written objection prepared in response to the draft EIA.

It is only now, on scrutiny of the final EIA, that we have realised the oversight of Savannah Environmental, in ignoring the size of the Jakkalsfontein community, and the extent of the impact that the proposed development will have on our community. We must register our protest in the strongest possible terms against the development, in order to protect our investment, both financial and environmental.

We remain keenly interested in the progress of the application, and would appreciate any updates you could supply.

Regards

**From:** Ishaam Abader ( <mailto:labader@environment.gov.za> )

**Sent:** Friday, May 06, 2011 10:47 AM

**To:** Butch Rice ( <mailto:mwbutchr@mweb.co.za> )

**Cc:** Dumisane Mthembu ( <mailto:DMthembu@environment.gov.za> ) ; Sibusisiwe Hlela ( <mailto:SHlela@environment.gov.za> ) ; Wynand Fourie ( <mailto:Wfourie@environment.gov.za> )

**Subject:** Re: Wind Farms

Dear Mr Rice

I will copy my colleagues that may be able to assist with this, but I think that we will need more details to assist with the specific issues. Please be aware however that if you are dissatisfied with a project, you are entitled as an interested and affected party to raise your concerns via objection or appeal.

We are also mindful of the concerns that you raise and will definitely consider representations in this regard.

Regards

Butch Rice

Ishaam Abader  
Deputy Director General: Environmental Quality and Protection  
Tel: (012) 310 3391  
Fax: (012) 322 1936  
[labader@environment.gov.za](mailto:labader@environment.gov.za)  
[www.environment.gov.za](http://www.environment.gov.za)

>>> "Butch Rice" <[mwbutchr@mweb.co.za](mailto:mwbutchr@mweb.co.za)> 5/2/2011 5:29 PM >>>

Hi Ishaam,

Guy Preston, a good friend of mine, suggested I contact you. I write to you because of my concern about the approval of wind farms in the Western Cape, and would like more clarity on the requirements of the EIAs.

I have noted, with some concern, the recent approval of the wind farm at Paternoster, an acknowledged tourist destination. Closer to home, opposite Jakkalsfontein, where I live, the same company has applied for permission to erect 80 turbines, in the direct path of migrating birds. In addition the bat population is going to be hammered, and the noise and light pollution will have a significant impact on our lives at Jakkalsfontein, a private nature reserve facing the Darling Hills where the installation is planned.

I notice that the major shareholders in Moyeng Energy are Investec Plc, and the French utility company GDF Suez, companies who clearly have no long term interest in our environment.

What is of most concern about wind farms is their high cost and extremely low efficiency. According to the John Muir Trust, in the UK, we can expect no more than about a quarter of energy generating capacity to be delivered.

On the face of it, installation of these wind turbines is going to have a significant impact on our environment, and our tourism efforts in the Western Cape. In addition it is going to cost plenty.

I seem to remember reading recently that the requirements of the EIAs has been toughened up. Is this reality? And where do we stand with the development at Rhebokfontein, opposite Jakkalsfontein?

As a very concerned conservationist, birder, and Jakkalsfontein resident, I hope you can be of assistance.

Many thanks

Regards

Butch Rice

**\*\*NOTE: Departement name change from\*\* \*\*DEAT.gov.za to Environment.gov.za\*\*** This message and any attachments transmitted with it are intended solely for the addressee(s) and may be legally privileged and/or confidential. If you have received this message in error please destroy it and notify the sender. Any unauthorized usage, disclosure, alteration or dissemination is prohibited. The Department of Environmental Affairs accepts no responsibility for any loss whether it be direct, indirect or consequential, arising from information made available and actions resulting there from. The views and opinions expressed in this e-mail message may not necessarily be those of Management.

This message and any attachments transmitted with it are intended solely for the addressee(s) and may be legally privileged and/or confidential. If you have received this message in error please destroy it and notify the sender. Any unauthorized usage, disclosure, alteration or dissemination is prohibited. The Department of Environmental Affairs accepts no responsibility for any loss whether it be direct, indirect or consequential, arising from information made available and actions resulting there from. The views and opinions expressed in this e-mail message may not necessarily be those of Management.

## Ravisha Ajodhapersadh

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**From:** Ravisha Ajodhapersadh <ravisha@savannahsa.com>  
**Sent:** 12 June 2011 04:45 PM  
**To:** Butch Rice (mwbutchr@mweb.co.za)  
**Cc:** Takalani Maswime (TMaswime@environment.gov.za); ShawnJohnston (swjohnston@mweb.co.za); joanne@savannahsa.com  
**Subject:** RE: Proposed Rheboksfontein Wind Energy Facility  
**Attachments:** DEA rejection of DEIR (Mar10).TIF

Dear Sir  
DEA letter is attached, as requested.

Kind Regards

Ravisha Ajodhapersadh

Savannah Environmental (Pty) Ltd  
Unit 606, 1410 Eglin Office Park  
14 Eglin Road  
Sunninghill  
Tel: +2711 234-6621  
Fax: +2786 684 0547  
Cell: +2784 300 0660  
Email: [ravisha@savannahsa.com](mailto:ravisha@savannahsa.com)  
[www.savannahSA.com](http://www.savannahSA.com)

Begin forwarded message:

**From:** "Butch Rice" <[mwbutchr@mweb.co.za](mailto:mwbutchr@mweb.co.za)>  
**Date:** 10 June 2011 8:37:37 AM  
**To:** "ShawnJohnston" <[swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)>  
**Cc:** "Takalani Maswime" <[tmaswime@environment.gov.za](mailto:tmaswime@environment.gov.za)>  
**Subject:** Proposed Rheboksfontein Wind Energy Facility

Dear Mr. Johnston,

**PROPOSED RHEBOKSFONTEIN WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE  
ON A SITE NEAR DARLING, WESTERN CAPE PROVINCE  
DEA Ref No. 12/12/20/1582**

**RE: UPDATE ON THE EIA PROCESS AND WAY FORWARD**

Your letter dated 5 June 2011 addressed to "Stakeholder" refers. Your letter refers to "primary issues that require attention in the EIA report" which was rejected by the DEA. You are kindly requested to provide me with a copy of the relevant letter from the Department of Environmental Affairs.

Should this not be possible, kindly provide the full reasons for the DEA's rejection of the report, as well as the secondary issues that require further attention or resolution in the EIA.

Yours sincerely,

Butch Rice  
Jakkalsfontein

## Ravisha Ajodhapersadh

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**From:** ShawnJohnston <swjohnston@mweb.co.za>  
**Sent:** 08 June 2011 08:23 AM  
**To:** Ravisha Ajodhapersadh  
**Subject:** Fwd: Rheboksfontein Wind Energy Facility

Hi Ravisha,

Find attached for the record the registration of Peter Roux on the Rheboksfontein EIA. Please save it for inclusion into the PPP of the Final EIA report.

Sincerely,

**Shawn Johnston**  
**Process Specialist**

**Sustainable Futures ZA**

**P.O. Box 749**  
**Rondebosch**  
**7701**  
**Cape Town**  
**South Africa**

**Tel:++27 083 325 9965**  
**Fax: 086 510 2537**  
**E-mail: [swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)**

Begin forwarded message:

**From:** ShawnJohnston <[swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)>  
**Date:** 08 June 2011 7:19:54 AM  
**To:** Peter Roux <[peteroux@iafrica.com](mailto:peteroux@iafrica.com)>  
**Cc:** Butch Rice <[mwbutchr@mweb.co.za](mailto:mwbutchr@mweb.co.za)>  
**Subject:** Re: Rheboksfontein Wind Energy Facility

Dear Mr. Peter Roux,

Thank you for your e-mail. You have been registered on the database for the proposed Moyeng Rheboksfontein Wind Energy Facility near Darling.

Sincerely,  
**Shawn Johnston**  
**Process Specialist**

**Sustainable Futures ZA**

**P.O. Box 749**  
**Rondebosch**  
**7701**  
**Cape Town**  
**South Africa**

**Tel:++27 083 325 9965**

Fax: 086 510 2537

E-mail: [swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)

On 07 Jun 2011, at 10:11 PM, Peter Roux wrote:

Dear Mr Johnston

This communication serves to notify you that I wish to be registered as an interested and affected party for the Rheboksfontein Wind Energy Facility DEA Ref No 12/12/20/1582.

Peter Roux

082 493 4756

[peteroux@iafrica.com](mailto:peteroux@iafrica.com)

## Ravisha Ajodhapersadh

---

**From:** Ravisha Ajodhapersadh <ravisha@savannahsa.com>  
**Sent:** 10 June 2011 09:25 PM  
**To:** 'ShawnJohnston'; 'Butch Rice'  
**Subject:** RE: Rheboksfontein Wind Energy Project

Dear Sir

As requested, the case officer for the Rheboksfontein project is Sandile Vilakazi – Tel: 012 310 3891  
email: [svilakazi@environment.co.za](mailto:svilakazi@environment.co.za)

Kind Regards

Ravisha Ajodhapersadh

Savannah Environmental (Pty) Ltd  
Unit 606, 1410 Eglin Office Park  
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**From:** ShawnJohnston [mailto:[swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)]  
**Sent:** 08 June 2011 08:25 AM  
**To:** Butch Rice  
**Subject:** Re: Rheboksfontein Wind Energy Project

Dear Mr. Butch Rice,

Thank you for your e-mail. I'll pass your request onto Savannah Environmental.

Sincerely,

Shawn Johnston  
Process Specialist

Sustainable Futures ZA

P.O. Box 749  
Rondebosch  
7701  
Cape Town  
South Africa

**Tel:++27** 083 325 9965  
**Fax:** 086 510 2537  
**E-mail:** [swjohnston@mweb.co.za](mailto:swjohnston@mweb.co.za)

On 08 Jun 2011, at 7:38 AM, Butch Rice wrote:

Dear Mr Johnston,

Could you please let me have the name and contact details of the DEAT case officer who is dealing with the Rheboksfontein project? Email and phone number, if possible.

Many thanks

Butch Rice

Jakkalsfontein