



GA Environment

**COMMENTS AND RESPONSES REPORT FOR THE PROPOSED
UPGRADE OF NATIONAL ROAD R101 SECTION 8 FROM BELA
BELA (KM 0.0) TO MODIMOLLE (KM 26.8), WATERBERG DISTRICT
MUNICIPALITY, LIMPOPO PROVINCE**

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1. INTRODUCTION

This Comments and Responses Report (CRR) captures the comments and issues raised by Interested and Affected Parties (I&APs) and authorities during the initial notification phase and the availability of the Draft Basic Assessment Report (DBAR) for the Upgrade of National Road R101 Section 8 from Bela Bela (km 0.0) to Modimolle (km 26.8), Waterberg District Municipality, Limpopo Province.

The necessity for the CRR is based on Regulation 44 of the National Environmental Management Act's (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014 (as amended). A summary of the Public Participation Process undertaken for the project to date is as follows:

- A newspaper advertisement was placed in in the local newspaper (Die Pos / The Post) on the 1st of April 2021, calling for I&APs registration with the project and comments. Proof of the newspaper advertisement is attached in **Appendix E1** of the DBAR;
- Notification letters were compiled and distributed to all adjacent landowners on the 31st of March and 1st of April 2021. Proof of the of the distribution is attached in **Appendix E2 and E8** of the DBAR;
- Site notices were placed in various locations along and within proximity of the R101 Section 8 on the 31st of March and 1st of April 2021. Proof of the site notices placement is attached in **Appendix E3** of the DBAR;
- Electronic versions of the notification letters were distributed to I&APs between March and April 2021;
- The Draft Basic Assessment Report (Revision 0) was compiled and made available for the legislated 30-days public review and comments between 15th June 2021 and 16th July 2021.
- Hard copies of the DBAR were provided to following commentary authorities and institutions:
 - Waterberg District Municipality;
 - Environment, Social and Disaster Department;
 - Infrastructure Development Department; and
 - Planning Department and Economic Development.
 - Bela Bela Local Municipality;
 - Technical Services (Roads and Stormwater);
 - Planning and Economic Development;
 - Roads and Infrastructure;
 - Town Planning; and
 - Bela Bela Local Municipality Library.
 - Modimolle Local Municipality;
 - Technical Services (Roads and Stormwater);
 - Planning and Economic Development;
 - Roads and Infrastructure;
 - Town Planning; and
 - Modimolle Local Municipality Library.
 - Limpopo Provincial Government:
 - Department of Agriculture and Rural Development;
 - Department of Economic Development Environment and Tourism;

- Biodiversity Management; and
 - Environmental Impact Management,
 - Department of Transport;
 - Public Works, Roads and Infrastructure Department; and
 - Limpopo Provincial Heritage Resources Authority (LIHRA)
- Roads Agency Limpopo (RAL);
- South African Heritage Resources Agency (SAHRA); and
- Department of Water and Sanitation (DWS) - Limpopo Regional Office.
- Electronic copies of the DBAR were made available to all registered I&APs. Proof of the notifications on the availability of the DBAR are attached as **Appendix E9** of the Revised DBAR.
- The Draft Basic Assessment Report (Revision 0) was then revised to include additional construction information and associated impacts assessment received after the publication of Revision 0. The present DBAR (Revision 1) will be placed out for a further 30-day review period from the **6th of August 2021** to the **6th of September 2021**;
- The hard copies of the report will be placed at the Bela Bela Local Municipality Library and Modimolle Local Municipality Library. Electronic copies of the report will be available to all I&APs through the GladAfrica website. The following commentary authorities will be issued with the electronic copy of the report (hard copies will be provided when requested):
 - Department of Forestry, Fisheries and Environment:
 - Integrated Environmental Authorisations;
 - Biodiversity and Conservation Unit; and
 - Forestry Management - Limpopo/Mpumalanga Region.
 - Waterberg District Municipality;
 - Environment, Social and Disaster Department;
 - Infrastructure Development Department; and
 - Planning Department and Economic Development.
 - Bela Bela Local Municipality;
 - Technical Services (Roads and Stormwater);
 - Planning and Economic Development;
 - Roads and Infrastructure; and
 - Town Planning;
 - Modimolle Local Municipality;
 - Technical Services (Roads and Stormwater);
 - Planning and Economic Development;
 - Roads and Infrastructure; and
 - Town Planning.
 - Limpopo Provincial Government:
 - Department of Agriculture and Rural Development;
 - Department of Economic Development Environment and Tourism;
 - Biodiversity Management; and
 - Environmental Impact Management,
 - Department of Transport;
 - Public Works, Roads and Infrastructure Department; and
 - Limpopo Provincial Heritage Resources Authority (LIHRA)

- Roads Agency Limpopo (RAL);
- South African Heritage Resources Agency (SAHRA); and
- Department of Water and Sanitation (DWS) - Limpopo Regional Office.
- SMS, and e-mail notifications will be utilised to notify all registered I&AP's about the availability of the Revised DBAR and the changes provided in report.
- All comments made by the public and Commenting Authorities will be incorporated into the final report which will be submitted to DFFE for review and decision-making

Table 1 indicates the name of the I&AP, their organisation, the date of the receipt of the comments, their communication methods well as the response of the Environmental Assessment Practitioner (EAP) to the comment. This report contains all comments that have been received to date. In addition to the comments noted in **Table 1**, during the distribution of notification letters to the adjacent landowners, the community was given an opportunity to provide comments if necessary. These comments ranged from requests for jobs, improved traffic in the area and concerns of the possibility of closure of entrances from the R101 to their properties.

2. COMMENTS AND RESPONSES REPORT

Table 1: Comments and responses for the SANRAL R101 Section 8 Road Upgrade

| NAME AND SURNAME OF PARTY/PARTIES | COMMENT | EAP's RESPONSE |
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| 2.1 COMMENTS FROM THE COMPETENT AUTHORITY ON DRAFT BASIC ASSESSMENT REPORT | | |
| <p>1 Department of Forestry, Fisheries and the Environment - Integrated Environmental Authorisations</p> <p>Constance Musemburi Date received: 14th July 2021 Receipt Method: Email</p> | <p>The amended draft Basic Assessment Report (BAR) dated June 2021 and received by this Department on 15 June 2021, refers.</p> <p>A. <u>Listed Activities and required information</u></p> <ul style="list-style-type: none"> • Please provide a clear and detailed project description. The description in the application form and the DBAR is not consistent. Should the application form be amended to be in line with the BAR, an amended application form must be submitted together with the FBAR. • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed. • If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. • Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.zaklocuments/fornns. • It is imperious that the relevant authorities are continuously involved throughout the basic assessment process as the | <ul style="list-style-type: none"> • The projection description in the application form was summarized as the project description indicated in the BAR was considered too detailed to include in the section of the application form. The application form has been amended to include the detailed project description. The revised application form has been submitted with the revised BAR. • The listed activities applicable to the proposed project has been applied for. • All relevant authorities as listed in Chapter 1 above were identified and engaged throughout the EA process. Softcopies and hardcopies of the Draft Basic Assessment reports were |

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| | <p>development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> <ul style="list-style-type: none"> • The Environmental Assessment Practitioner (EAP) is required to provide the potential impacts and mitigation measures of the proposed infrastructure. • The EMPr must include mitigation and monitoring measures to all the environmental impacts identified and assessed for the above-mentioned proposed activity. Furthermore, the EMPr must include all recommendations and mitigation measures recorded in the final BAR <p><u>B. The FBAR must include the following design and construction activities which deem to be associated to the proposed project</u></p> <ul style="list-style-type: none"> • Route surveys and pegging; • Detailed design of the road alignment, geometry and infrastructure; • Transportation of construction materials and staff; | <p>provided to these authorities on the 15th of June 2021. Follow up emails reminding the authorities to provide comments were sent on the 13th of July 2021. At the time of the compilation of the report, comments from the authorities were received from DFFE, LEDET and Waterberg District Municipality. Correspondence with the commentary authorities has been included in Appendix E9 of the DBAR.</p> <ul style="list-style-type: none"> • The potential impacts and mitigation measures are provided in Chapter 8 of the DBAR. This report will also be issued to the all relevant authorities for further input • The EMPr (Appendix G1) provides mitigation and monitoring for the anticipated impacts. In addition, a Rehabilitation Plan (Appendix G2), Alien Invasive Management Plan (Appendix G3) and Erosion and Soil Management Plan (Appendix G4) were compiled to ensure there is minimal environmental degradation and rehabilitation is properly managed. <ul style="list-style-type: none"> • Route surveys and pegging is currently ongoing, the information will be provided in the FBAR; • Detailed design of the alignment, geometry and infrastructure is attached to the DBAR as Appendix B4. |
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| | | <ul style="list-style-type: none"> • Material laydown and stockpiling; • Traffic diversions; access. and haul roads; • Demolition of existing infrastructure; • Clearing of vegetation and building of temporary site camps; • Site establishment including storm water controls; | <ul style="list-style-type: none"> • At the time of compilation of this report, the detailed information regarding the transportation of construction material and staff was not available as these will be negotiated with the Contractor/s during the tendering stage. • Although the material laydown and stockpiling will be negotiated with the Contractor during tendering stage of the project, the EAP has identified potential laydown and stockpiling areas on less sensitive areas as indicated in Appendix A and Section 1.5.8 of the DBAR. The final material laydown and stockpiling areas must be approved by the ECO. • Traffic diversion, access and haul roads are provided in the Final Preliminary Design Report (Appendix B1) and The Construction Methodology for the Replacement of Major Structures on the R101 Section 8 (Appendix B2) as well as indicated in Section 1.5.5 of the DBAR. • Demolition of existing structures will include bridges (Modderloop Bridge and Groot Nyl River Bridge) and three Major Culverts (IDC3321, IDC3322 and Major Culvert at km 22.5). Information regarding the demolition of these structures is provided in the Final Preliminary Design Report (Appendix B1) and The Construction Methodology for the Replacement of Major Structures on the R101 Section 8 (Appendix B2) as well as indicated in Sections 1.5.4 and 1.5.5 of the DBAR. • There will be vegetation clearing at the realignment areas as indicated in Section 4.1.3. Although the material laydown and stockpiling will be negotiated with the Contractor during tendering stage of the project, the EAP has identified potential laydown and stockpiling areas indicated in |
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| | | <ul style="list-style-type: none"> • Stripping and stockpiling of soil resources in accordance with a soil management plan; • Bulk earthworks (cut and fill); grading and layer works; • Construction of engineered base layers and storm water infrastructure; • Road surfacing, painting and signage (including recovery of existing layer works and asphalt); • Collection, storage and removal of construction related waste; • Perimeter fencing; landscaping and rehabilitation | <p>Appendix A and Section 1.5.8 of the DBAR. The final material laydown and stockpiling areas must be approved by the ECO.</p> <ul style="list-style-type: none"> • Erosion and Soil Management Plan (Appendix G4) was compiled to ensure there is minimal soil erosion and necessary rehabilitation is properly managed. • There will be box high cuts and fills along realignment areas. The Final Preliminary Design Report (Appendix B1) provides information on the layer works. • The Construction Methodology for the Replacement of Major Structures on the R101 Section 8 is provided in Appendix B2 as well as indicated in Sections 1.5.4 and 1.5.5 of the DBAR. • Information road surfacing, painting and signage is provided in the Project Description (Chapter 1.5) and also in the Final Preliminary Design Report (Appendix B1). • The exact details regarding the collection, storage and removal of construction material were not available at the time of compilation of this report as these will be finalized during the tendering stage. However, the EAP has recommended temporary storage areas in Appendix A and Section 1.5.8 of the DBAR. The EAP has also provided registered landfill sites where the construction material waste should be disposed as indicated in Section 2.1.3 of the DBAR. • The current SANRAL R101 has a servitude of 35m on average and identifiable by the perimeter fencing, this fence will be kept in place and improved where necessary. The new sections along the realignment areas will also have a perimeter fence to separate the new SANRAL property and |
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| | <p>C. <u>Layout and sensitivity maps</u></p> <ul style="list-style-type: none"> • Please provide a layout map which indicates the following: • All supporting onsite infrastructure that will support the proposed development, e.g. roads (existing and proposed), camp sites, and etc. • The preferred design/layout alternative of the proposed project. • The location of sensitive environmental features on site e.g. Critical Biodiversity Areas (CBAs), heritage sites, wetlands, drainage lines, anticipated erosion, farming activities, existing substation, etc., that will be affected. • Buffer areas and, all "no-go" areas. • The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring developments and all existing infrastructure that will be affected by the proposed project. • The total footprint and centre coordinates of the area and exact location of the proposed development and associated infrastructure must be mapped at an appropriate scale. <p>D. <u>Specialist declaration of interest</u></p> <ul style="list-style-type: none"> • Specialist Declaration of interest forms must be attached to the FBAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Departments website (please use the Departments template). | <p>private properties. Rehabilitation will be undertaken in alignment with the EMPr and Rehabilitation Plans.</p> <ul style="list-style-type: none"> • An amended site sensitivity showing neighboring towns, existing roads, buffer areas and no go areas, protected trees and heritage features in Chapter 9 (Figure 37) of the DBAR. Additional sensitivity maps including terrestrial biodiversity, heritage and hydraulic sensitivity were added to the DBAR in Appendix A. • The specialist declaration of interest forms in the DFFE Department's template have been attached to Appendix F6 of the DBAR. |
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| | <p>E. <u>Specialist assessments</u></p> <ul style="list-style-type: none"> • Specialist studies to be conducted must provide a detailed description of their methodology, as well as au other associated infrastructure that they have assessed and are recommending for the authorisation. • The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice. <p>F. <u>Alternatives</u></p> <ul style="list-style-type: none"> • Please note that <i>you</i> are required to provide a full description of the process followed to reach the proposed preferred alternative within the site in terms of Appendix 1(3)(1)(h) of the NEMA EIA • Regulations 2014, as amended, including the following content: <ul style="list-style-type: none"> ○ (a) details of all the alternatives considered; ○ (b) details of the public participation process undertaken in terms of regulation 41 of the NEMA EIA Regulations 2014, as amended, including copies of the supporting documents and inputs; | <ul style="list-style-type: none"> • The specialists have provided the methodologies used for the specific assessments in their reports. Refer to Appendix F for the various specialist studies undertaken for this project. • Detailed limitations, gaps and assumptions have been provided in the specialists reports. • No contradicting recommendations from the specialists were made. <ul style="list-style-type: none"> • Detailed information regarding the alternatives is provided in Chapter 5 of the DBAR. • Details of the public participation process if provided in Chapter 6. • A summary of the issues raised by I&APs are provided in Chapter 3 of this Comments and Responses Report. |
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| | <ul style="list-style-type: none"> ○ (c) a summary of the issues raised by interested and affected parties (I&APs), and an indication of the manner in which the issues were incorporated, or the reasons for not including them; ○ (d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; ○ (e) the Impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- <ul style="list-style-type: none"> ○ can be reversed; ○ may cause irreplaceable loss of resources; and ○ can be avoided, managed or mitigated; ○ (f) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; ○ (g) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; ○ (h) the possible mitigation measures that could be applied and level of residual risk; ○ (i) the outcome of the site selection matrix; | <ul style="list-style-type: none"> ● Environmental attributes associated with the alternatives are provided in Chapter 5 and Chapter 8 of the DBAR. ● Impacts and risks associated with the alternatives including the nature, significance, consequence, extent and duration are provided in Chapter 8 of the DBAR. ● Impacts and risks associated with the alternatives including the nature, significance, consequence, extent and duration are provided in Chapter 7 of the DBAR. ● Positive and negative impacts associated with the alternatives is provided in Chapter 5 and Chapter 8 of the DBAR. ● Possible mitigation measures associated with the impacts is provided in Chapter 8, Appendix F and Appendix G of the DBAR. ● A site selection process was not undertaken for this project as the road is existing and the project entails the upgrading of the existing road. ● Alternatives were considered in the DBAR as indicated in Chapter 5 and Chapter 8 of the DBAR. ● A conclusive statement indicating the preferred alternatives is provided in Section 9.1 of the DBAR. |
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| | <ul style="list-style-type: none"> ○ (j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and ○ (k) a concluding statement indicating the preferred alternatives, including preferred location of the activity. ○ (l) Written proof of an investigation and motivation is required if no reasonable or feasible alternatives exist in terms of Appendix 1 <p>G. Undertaking of an Oath</p> <ul style="list-style-type: none"> • The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the DBAR, but rather an appendix of the application form attached to the BAR. Please note that the FBAR must also have an undertaking under oath/ affirmation by the EAP. • Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014,as amended, which states that the BAR must include: <i>“an undertaking under oath or affirmation by the EAP in relation to:</i> <ul style="list-style-type: none"> <i>a) the correctness of the information provided in the reports;</i> <i>b) the inclusion of comments and inputs from stakeholders and I&APs;</i> <i>c) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> | <ul style="list-style-type: none"> • Alternatives were considered in the DBAR as indicated in Chapter 5 and Chapter 8 of the DBAR • The undertaking of an Oath by the EAP has been attached as Appendix H of this Revised DBAR. |
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| | <p><i>d) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by Interested and affected parties.”</i></p> <p>H. <u>Details and expertise of the EAP</u></p> <ul style="list-style-type: none"> • You are required to include the details and expertise of the EAP in the FBAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended. <p>I. <u>Public Participation Process</u></p> <ul style="list-style-type: none"> • The following information must be submitted with the FBAR: <ul style="list-style-type: none"> ○ a) A list of registered I&APs as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; ○ b) Copies of all comments received during the DBAR comment period; and ○ c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the OBAR. Please note that comments received from this Department must also form part of the comment and response report • Please ensure that all issues raised and comments received during the circulation of the OBAR from registered J&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the FBAR. • Proof of correspondence with the various stakeholders must be included in the FBAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The public | <ul style="list-style-type: none"> • The details and expertise of the EAP are provided in Appendix H of the DBAR. • A list of I&AP Register is provided in Appendix E4 of the DBAR. • All comments received during the DBAR (Revision 0) Comment Period are provided in Appendix E9 of this Revised DBAR. • This report serves as the comment and response report for all comments received during the public participation process and is attached to the DBAR as Appendix E5. • All comments received during the DBAR Comment Period will be adequately addressed in the FBAR. The comments and response report (Appendix E5) will be updated to reflect all comments received for the project. • All relevant authorities were identified and are constantly engaged throughout the EA process. Softcopies and hardcopies of the Draft Basic Assessment reports were provided to the authorities Listed in Chapter 1 of this Comments and Responses Report on the 15th of June 2021. |
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| | <p>participation process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the NEMA EIA Regulations 2014, as amended.</p> <p>J. <u>Environmental Management Programme</u></p> <ul style="list-style-type: none"> You are required to comply with the content of the EMPr in terms of Appendix 4 of the NEMA EIA Regulations 2014, as amended. <p>K. <u>Environmental Impact Statement</u></p> <ul style="list-style-type: none"> It is noted that an environmental impact statement is not included in the DBAR, therefore you are kindly requested to include an environmental impact statement which contains- <ul style="list-style-type: none"> a. a summary of the key findings of the environmental impact assessment; b. a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the site indicating any areas that should be avoided, including buffers; and c. a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives. <p>L. <u>General</u></p> <ul style="list-style-type: none"> Please also ensure that the FBAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended. | <p>Follow up emails reminding the authorities to provide comments were sent on the 13th of July 2021. All comments received at the compilation of this report been included in Appendix E9 of the DBAR.</p> <ul style="list-style-type: none"> The EMPr attached in Appendix G1 was compiled in line with terms of Appendix 4 of the NEMA EIA Regulations 2014, as amended. <p>An environmental impact statement was provided in Section 9.1 of the DBAR and was further updated where applicable.</p> <ul style="list-style-type: none"> These are included in the impact statement in Section 9.1 of the DBAR. A specific site sensitivity map showing neighboring towns, existing roads, buffer areas and no go areas, protected trees and heritage features in Chapter 9 (Figure 37) of the DBAR. These are provided in Chapter 9 of the DBAR. The period for which the Authorisation is required for (5 years) was specified on Section 9.2 of the DBAR. |
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| | <ul style="list-style-type: none"> • You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: “Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.” • Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained In the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days.” | <ul style="list-style-type: none"> • The comment is noted. The Final Basic Assessment Report will be submitted to the competent authority within the 90 stipulated timeframe. • The comment is noted. The DBAR was revised due to additional information relating to the construction methodology of bridges and culverts as well as associated impacts. The Revised DBAR has been reissued for a 30-day review period and the FBAR will be submitted within 90 Days of the initial DBAR submission. • The comment is noted. |
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| | | <ul style="list-style-type: none"> Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse. | |
| 2 | <p>Department of Forestry, Fisheries and the Environment - Biodiversity and Conservation Unit</p> <p>Shalot Sekonko Date received: 24th June 2021 Receipt Method: Email</p> | <p>Dear Mr. Mabunda</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the Draft Basic Assessment Report for the proposed upgrade of the National Road R101 Section 8 from Bela Bela (km 0.0) to Modimolle (km 26.8) in the Waterberg District, Limpopo Province. Kindly note that the project has been allocated to Ms. Rabothata (both copied on this email) and myself.</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for the attention of Mr Seoka Lekota.</p> | GA Environment is still awaiting comments from the Biodiversity and Conservation Unit. The Revised DBAR will be provided to the Biodiversity and Conservation Unit which afford additional time to provide comments on the DBAR. |
| 3 | <p>Department of Forestry, Fisheries and the Environment – Forestry Management Limpopo Mpumalanga Region</p> <p>Masilo Gilbert Mafoko Date received: 2nd August 2021 Receipt Method: Email</p> | <ul style="list-style-type: none"> Under the Biodiversity Assessment in the report, it is observed that <i>Sclerocarya birrea subsp. caffra</i> (Marula) and <i>Combretum imberbe</i> (Leadwood), which falls under Protected Trees in terms of [Section 15(1) of the National Forest Act 84, of 1998, amended] might be affected by the construction. The Department is the custodian of the National Forests Act, No. 84 of 1998 (as amended), which among others provide special measures for the protection of forests and trees. The list of trees is gazetted annually. If any of activities of the project might affect the protected trees, application form for a license must be completed and forwarded to the Department for processing. Upon granting of | As indicated in the DBAR and Terrestrial Biodiversity Assessment report, there are two protected trees species which will be affected by the road upgrade. A protected tree search and rescue plan which includes the protected tree license application will be undertaken prior the construction phase in consultation with the Department of Forestry, Fisheries and the Environment – Forestry Management Limpopo Mpumalanga Region. The footprint of the develop will kept as minimal as possible and rehabilitation will be undertaken as soon as possible. |

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| | | <p>the license the project can proceed with the activities which will affect the protected trees.</p> <ul style="list-style-type: none"> • The footprint of disturbance must be kept as small as possible, and must be rehabilitated as soon as possible. | |
| 2.2 COMMENTS FROM THE COMMENTARY AUTHORITY ON DRAFT BASIC ASSESSMENT REPORT | | | |
| <p>1</p> | <p>Limpopo Department of Economic Development, Environment & Tourism – Biodiversity Management</p> <p>Errol Tukiso Moeng Date received: 29th July 2021 Receipt Method: Email</p> | <p>A. Sections of the R101 Road to be upgraded versus the study area</p> <ul style="list-style-type: none"> • The two sections (as depicted in the Terrestrial Biodiversity Report [page 3, Figure 1-2]) of the R101 Road to be upgraded are approximately 2.5 km's long. The segments of the R101 Road to be upgraded in the Basic Assessment Report (Page 16, Figure 4) are not correlating to the Biodiversity Report sampling points and as such a realignment is required. <p>B. Important Conservation Features/habitats</p> <ul style="list-style-type: none"> • Aquatic Habitats — all aquatic systems are considered important and are protected habitats, proper delineation assessment(s) have been conducted identified aquatic systems. • Climate Change Resilient Habitats—Tall trees along riparian vegetation or water channels act as carbon storage and it is advised that mature trees should be avoided during construction as they are critically important for climate change mitigation. • River Corridors — in terms of ecological value, river corridors are home to ecosystems associated with the river, both aquatic and terrestrial, as well as those in between, forming an area of outstanding environmental value. | <ul style="list-style-type: none"> • Specialists assessments study area was exaggerated at the three realignment areas to assess a larger area than the actual proposed upgrade area. The aim of this process was obtain a holistic environmental sensitivity in the case that the realignment were to slightly deviate. • A Freshwater Assessment: Wetland Delineation and Impact Assessment was undertaken and at risk watercourses and associated delineations, buffer areas, impacts and mitigations are provided in the report attached as Appendix F4. • The construction activities will be limited to the delineated and approved construction area to limit any further impacts on surrounding terrestrial and aquatic habitats. • Noted. River corridors were assessed by the Freshwater Assessment: Wetland Delineation and Impact Assessment |

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| | <p>C. <u>Vegetation Types and their conservation classes</u></p> <ul style="list-style-type: none"> • Central Sandy Bushveld: <ul style="list-style-type: none"> ○ Vulnerable Total remaining: 13087.1 sqkm ○ Conservation target: 19% (2486.5 sqkm or 248650 ha) ○ Already conserved: 4.5% ○ To be developed: Groot Nyl River Bridge ID B447 and Major Box Culvert 3 • Springbokvlakte Thornveld: <ul style="list-style-type: none"> ○ Endangered Remaining Total: 4460.1 sqkm ○ Conservation target: 19% (847.4 sqkm or 84740 ha) ○ Already conserved: 3.6% ○ To be developed: Major Box Culvert 1-IDC 3321 and Major Box Culvert 2 — IDC 3322 • Waterberg Mountain Bushveld <ul style="list-style-type: none"> ○ Least threatened ○ Remaining Total: 8532.3 sqkm ○ Conservation target: 24% (2047.7 sqkm or 204770 ha) ○ Already conserved: 9.3% ○ To be developed: Modderloop Bridge ID. 8375 <p>D. <u>The construction of camps and material storage</u></p> <ul style="list-style-type: none"> • All camps and material storage areas should be established on already degraded habitats (no natural remain) and away from water (and riparian vegetation). This will ensure that all natural habitats and untargeted areas are properly protected. | <ul style="list-style-type: none"> • The vegetation types, current conditions, anticipated impacts and mitigations were assessed and are provided in the Terrestrial Biodiversity Assessment Report (Appendix F1). <ul style="list-style-type: none"> • And assessment of the potential construction camp was undertaken based on identifying the least sensitive areas which could be used for construction camp and material laydown areas was undertaken. The information in provided in Section 1.5.8 of the DBAR. |
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| | <p><u>E. The implication of the proposed development of new bridges with raised height and width (river crossing)</u></p> <ul style="list-style-type: none"> • Reduced water flow speed. This will permit movement of aquatic species up and down the stream with ease and as such facilities movement and connectivity (DNA) of subpopulations along the river. • Wildlife movement. The proposed design of the bridges will not only aid people through safe/enhanced traffic flow, but also wildlife crossing between the two fragments of the same habitat. The bridge is anticipated to cover also riparian vegetation along the riverbanks (both sides) and by so doing allowing small to medium sized fauna to cross safely and effectively under the bridge (avoiding road-kills and accidents). <p><u>F. Introduction of alien invasive species</u></p> <ul style="list-style-type: none"> • An alien invasive species eradication Management plan for during and post development is going to be critical for rehabilitation of all affected watercourses/areas. <p><u>G. Land management Objectives in proposed development area</u></p> <ul style="list-style-type: none"> • Critical Biodiversity Area 1 (CBA1) <ul style="list-style-type: none"> ○ Maintain in a natural state with limited or no biodiversity loss. ○ Rehabilitate degraded areas to a natural or near natural state and manage for no further degradation. • Critical Biodiversity Area 2 (CBA2) <ul style="list-style-type: none"> ○ Maintain in a natural state with limited or no biodiversity loss. ○ Maintain current agricultural activities. | <ul style="list-style-type: none"> • The aquatic connectivity between upstream and downstream habitats will be maintained. • It is anticipated that road killings of animals associated with the road upgrade may increase especially at the realignment areas as it is noted to be a busy road with significant traffic volumes flowing at approximately 100km/hr. It is proposed that the road servitude will be fenced off from the adjacent private game farms to reduce any potential animal road killings. • An alien invasive management plan was compiled and attached to the DBAR as Appendix G3. • The biodiversity types, current conditions, anticipated impacts and mitigations were assessed and are provided in the Terrestrial Biodiversity Assessment Report (Appendix F1). The proposed development of the R101 Section 8 from Bela Bela to Modimolle will result in the destruction and fragmentation of intact and functional CBA areas, areas rated “Very High”. Recommendations and mitigations to reduce these impacts are provided in Chapter 8 and Appendix F1 of the DBAR. |
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| | <ul style="list-style-type: none"> ○ Ensure that land use is not intensified and that activities are managed to minimize impact on threatened species. ● Ecological Support Area 1 (ESA1) <ul style="list-style-type: none"> ○ Maintain ecosystem functionality and connectivity allowing for limited loss of biodiversity pattern ● Ecological Support Area 2 (ESA2) <ul style="list-style-type: none"> ○ Avoid additional/new impacts on ecological processes. <p>H. <u>Compatible Land Uses</u></p> <ul style="list-style-type: none"> ● Critical Biodiversity Area 1 (CBA1) <ul style="list-style-type: none"> ○ Conservation and associated activities. ○ Extensive game farming and eco-tourism operations with strict control on environmental impacts and carrying capacities, where the overall there is a net biodiversity gain. ○ Extensive Livestock Production with strict control on environmental impacts and carrying capacities. ○ Required support infrastructure for the above activities. ○ Urban Open Space Systems ● Critical Biodiversity Area 2 (CBA2) <ul style="list-style-type: none"> ○ Current agricultural practices including arable agriculture, intensive and extensive animal production, as well as game and ecotourism operations, as long as these are managed in a way to ensure populations of threatened species are maintained and the ecological processes which support them are not impacted. ○ Any activities compatible with CBA1. ● Ecological Support Area 1 (ESA1) <ul style="list-style-type: none"> ○ Conservation and associated activities ○ Extensive game farming and eco-tourism operations. ○ Extensive Livestock Production. ○ Urban Open Space Systems. ○ Low density rural residential, smallholdings or resorts where development design and overall development densities allow maintenance of ecological functioning. | <ul style="list-style-type: none"> ● The recommendations provided (Section 9.2) by the EAP and specialist Report (Appendix F1) stipulate that construction related activities must be limited to the least sensitive areas away from the CBAs and ESAs as far as possible. In addition, the potential construction camp and material laydown areas identified in the DBAR were on areas significantly modified and out of the CBAs and ESAs. |
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| | <ul style="list-style-type: none"> • Ecological Support Area 2 (ESA2) <ul style="list-style-type: none"> ○ Existing activities (e.g. arable agriculture) should be maintained, but where possible a transition to less intensive land uses or ecological restoration should be favoured. I. <u>Incompatible Land Uses</u> • Critical Biodiversity Area 1 (CBA1) <ul style="list-style-type: none"> ○ Urban land-uses including Residential (including golf estates, rural residential, resorts), Business, Mining & Industrial; ○ Infrastructure (roads, power lines, pipelines). ○ Intensive Animal Production (all types including dairy farming associated with confinement, imported foodstuffs, and improved/irrigated pastures). ○ Arable Agriculture (forestry, dry land & irrigated cropping). ○ Small holdings. • Critical Biodiversity Area 2 (CBA2) <ul style="list-style-type: none"> ○ Urban land-uses including Residential (including golf estates, rural residential, resorts), Business, Mining & Industrial; ○ Infrastructure (roads, power lines, pipelines). ○ More intensive agricultural production than currently undertaken on site. ○ Note: Certain elements of these activities could be allowed subject to detailed impact assessment to ensure that developments were designed to CBA2. Alternative areas may need to be identified to ensure the CBA network still meets the required targets. • Ecological Support Area 1 (ESA1) <ul style="list-style-type: none"> ○ Urban land-uses including Residential (including golf estates), Business, ○ Mining & Industrial; ○ Infrastructure (roads, power lines, pipelines). | <ul style="list-style-type: none"> • The recommendations provided (Section 9.2) by the EAP and specialist Report (Appendix F1) stipulate that construction related activities must be limited to the least sensitive areas away from the CBAs and ESAs as far as possible. In addition, the potential construction camp and material laydown areas identified in the DBAR were on areas significantly modified and out of the CBAs and ESAs. |
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| | <ul style="list-style-type: none"> ○ Intensive Animal Production (all types including dairy farming associated with confinement, imported foodstuffs, and improved/irrigated pastures). ○ Arable Agriculture (forestry, dry land & irrigated cropping). ○ Note: Certain elements of these activities could be allowed subject to detailed impact assessment to ensure that developments were designed to maintain overall ecological functioning of ESAs. ● Ecological Support Area 2 (ESA2) <ul style="list-style-type: none"> ○ Any land use or activity that results in additional impacts on ecological functioning mostly associated with the intensification of land use in these areas (e.g. Change of floodplain from arable agriculture to an urban land use or from recreational fields and parks to urban <p>J. <u>General Recommendations</u></p> <ul style="list-style-type: none"> ● Critical Biodiversity Area 1 (CBA1) <ul style="list-style-type: none"> ○ No further loss of natural habitat should occur i.e. land in this category should be maintained as natural vegetation cover as far as possible; ○ These areas of land can act as possible biodiversity offset receiving areas. ● Critical Biodiversity Area 2 (CBA2) <ul style="list-style-type: none"> ○ Loss of natural habitat should be minimized i.e. land in this category should be maintained as natural vegetation cover as far as possible; ○ These areas of land can act as possible biodiversity offset receiving areas; ○ Control of illegal activities (such a hunting and dumping), which impact biodiversity should be prioritized in CBA areas. ● Ecological Support Area 1 (ESA1) | <ul style="list-style-type: none"> ● The recommendations provided (Section 9.2) by the EAP and specialist Report (Appendix F1) stipulate that construction related activities must be limited to the least sensitive areas away from the CBAs and ESAs as far as possible. In addition, the potential construction camp and material laydown areas identified in the DBAR were on areas significantly modified and out of the CBAs and ESAs. |
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| | <ul style="list-style-type: none">○ Maintain in a functional state, avoid intensification of land-uses, and rehabilitate to a natural or semi-natural state where possible. In transformed areas which are important for maintaining ecological processes, current land uses should be maintained, intensification of use (e.g. a transition from agriculture to urban) should be avoided, and where possible areas should be rehabilitated.○ No further loss of natural habitat should be allowed, and land in this category currently in a degraded state should be rehabilitated or restored to a natural or semi-natural state once the current land-use has ceased;○ Maintain current land uses where these play a role in supporting ecological processes;○ Ensure land use changes do not impact negatively on ecological processes.○ The maintenance of connectivity between CBAs, continued ecosystem functioning within the CBA corridors, and the prevention of degradation of adjacent Critical Biodiversity Areas must be achieved;● Ecological Support Area 2 (ESA2)<ul style="list-style-type: none">○ Additional impacts on ecological processes should be avoided.○ In transformed areas, which are important for maintaining ecological processes, current land uses should be maintained, intensification of use (e.g. a transition from agriculture to urban) should be avoided, and where possible areas should be rehabilitated.○ The maintenance of connectivity between CBAs, continued ecosystem functioning within the CBA corridors, and the prevention of degradation of adjacent Critical Biodiversity Areas must be achieved; <p>K. Land Use Management Guidelines</p> | |
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| | <ul style="list-style-type: none"> • Critical Biodiversity Area 1 (CBA1) <ul style="list-style-type: none"> ○ Rezoning of properties to afford additional land-use rights that will result in increased biodiversity loss should not be granted; ○ Permission to increase the permitted number of units per erf or per ha should not be granted; ○ Developments should be limited to existing developed / degraded footprints, if present; ○ Units carefully dispersed or clumped to achieve least impact, particularly with regard to habitat loss and fragmentation; ○ The installation of infrastructure in CBAs is not desirable and should only be considered if all alternative alignment and design options have been assessed and found to be non-viable. Under such conditions, at least a Basic Assessment (BA) should be undertaken, and if approved, a comprehensive EMP must be developed and best practice restoration efforts strictly implemented; ○ Ecological Specialist to conduct the ecological assessment; ○ If the development is 'incompatible' with CBA1 (see above): <ul style="list-style-type: none"> - A Screening Exercise should be undertaken by a Biodiversity Specialist or Ecologist to verify the CBA map category on site; - If the site is verified as a CBA, developments other than the preferred biodiversity-compatible land-uses should be investigated in detail and the mitigation hierarchy applied in full; - If the application is pursued they should be informed by a specialist biodiversity assessment. • Critical Biodiversity Area 2 (CBA2) | <ul style="list-style-type: none"> • The recommendations provided (Section 9.2) by the EAP and specialist Report (Appendix F1) stipulate that construction related activities must be limited to the least sensitive areas away from the CBAs and ESAs as far as possible. Loss of natural and near natural habitat and vegetation must be first avoided, mitigated, rectified, reduced and offset as per the mitigation hierarchy provided in Figure 36 of the DBAR. In addition, the potential construction camp and material laydown areas identified in the DBAR were on areas significantly modified and out of the CBAs and ESAs. The terrestrial biodiversity assessments were undertaken by suitably qualified ecologist who used scientific methods for assessing the biodiversity, identifying the impacts and provided the recommendations to minimize the impacts. |
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| | <ul style="list-style-type: none"> ○ Rezoning of properties to afford additional land-use rights that will result in increased biodiversity loss through conversion of land from agriculture should not be granted; ○ Permission to increase the permitted number of units per erf or per ha should not be granted; ○ Developments should be limited to existing footprints, if present, and should avoid encroaching on natural or agricultural landscapes; ○ Should additional infrastructure be required, the requirements of threatened species should be considered. At least a Basic Assessment (BA) should be undertaken for any development which results in the intensification of land use, and if intensification of land use is approved, a comprehensive EMP must be developed to minimize impacts on threatened species; ○ Ecological Specialist to conduct the ecological assessment; ○ If the development is 'incompatible' with CBA2 (see above): <ul style="list-style-type: none"> - A Screening Exercise should be undertaken by a Biodiversity Specialist or Ecologist to verify the CBA map category on site; - If the site is verified as a CBA, developments other than the preferred biodiversity-compatible land-uses should be investigated in detail and the mitigation hierarchy applied in full; - If the application is pursued, they should be informed by a specialist biodiversity assessment. ● Ecological Support Area 1 (ESA1) <ul style="list-style-type: none"> ○ Rezoning of properties to afford additional land-use rights that will result in increased impact on ecological processes should not be granted, unless significant net conservation gains can be achieved, ecosystem functioning and connectivity of Ecosystem Support Areas (ESAs) will not be | |
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| | | <p>compromised, and biodiversity impacts regarding species and habitats are of at an acceptable significance and mitigated where possible.</p> <ul style="list-style-type: none">○ Developments should be limited to existing developed / degraded footprints, where possible.○ Units carefully dispersed or clumped to achieve least impact, particularly regarding impacts on ecological processes.○ Ecological Specialist to conduct the ecological assessment.○ If the development is incompatible with ESA1:<ul style="list-style-type: none">- A Screening Exercise should be undertaken by a Biodiversity Specialist or Ecologist to verify the CBA map category on site.- If the site is verified as an ESA, developments other than the preferred biodiversity-compatible land-uses should be carefully screened to ensure that developments are planned, and activities undertaken in a way that minimizes impact on ecological processes. Impacts should be mitigated.- If the application is pursued, they should be informed by a specialist biodiversity assessment.○ If the development area is transformed but important for maintaining ecological processes:<ul style="list-style-type: none">- Current land uses should be maintained, intensification of use (e.g., a transition from extensive agriculture to urban) should be avoided, and where possible areas should be rehabilitated.- Developments should be screened to ensure that they do not have an unacceptable impact on ecological processes. <p>● Ecological Support Area 2 (ESA2)</p> <ul style="list-style-type: none">○ Where infrastructure is proposed:<ul style="list-style-type: none">- Infrastructure should be designed to avoid additional impacts on ecological processes. | |
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| | <p>○ If the development area is transformed but important for maintaining ecological processes:</p> <ul style="list-style-type: none"> - Current land uses should be maintained, intensification of use (e.g., a transition from extensive agriculture to urban) should be avoided, and where possible areas should be rehabilitated. - Developments should be screened to ensure that they do not have an unacceptable impact on ecological processes <p>L. <u>Additional requirements</u></p> <ul style="list-style-type: none"> ● Is the development compatible with the CBA Map? No ● Does the application address all CBA requirements? No ● If 'No' above, what still needs to be addressed? <ul style="list-style-type: none"> ○ Sampling should factor-in all sections of R101 Road earmarked for development (five/04/5 sites along the road). ○ A study of Aquatic Invertebrates and fish on both up and down-stream of all perennial rivers before and after development should be conducted — this will be used as a water quality indicator and quantify the impacts if any) caused by the development earlier. ○ All supporting infrastructure (camps and material storage) anticipated to be developed should also be identified and included in the sampling (preferably on already degraded areas as directed by the Waterberg Bioregional Plan). | <ul style="list-style-type: none"> ● The proposed upgrade area largely within the existing road reserve of approximately 35 which has already been modified. All specialist studies assessed the entire R101 Section 8 between Bela Bela and Modimolle. The terrestrial biodiversity assessed a corridor of 100m align the straight road and 600m at the realignment areas. The freshwater assessment assessed a corridor of 1 kilometre throughout the entire route. All studies used scientific methods as stipulated by the guidelines and principles in their fields as indicated in the methodological approach of each specialist report in Appendix F. ● The freshwater assessment and recommendations by the EAP entails that water quality assessments and biomonitoring be undertaken prior and post construction phases both upstream and downstream of the impacted watercourses. During the construction phase, such assessments are recommended to be undertaken on weekly basis. ● Although the material laydown and stockpiling will be negotiated with the Contractor during tendering stage of the project, the EAP has identified potential laydown and stockpiling areas within the least sensitive environments are indicated in Appendix A and Section 1.5.8 of the DBAR. The final material laydown and stockpiling areas must be approved by the ECO. |
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| | <p>M. <u>Land Cover description</u></p> <ul style="list-style-type: none"> • Cultivation: recently cropped all • Urban industrial/transport • Urban residential • Urban new development • 10m Bare • 10m Bush • 10m Open bush • Erosion dongas • Majority of the development is proposed to be constructed on already degraded areas except for the Nyl River Bridge. Care should be taken to safeguard the ecosystem around the Nyl River Bridge — a buffer zone of a conservative distance should be established and demarcated. <p>N. <u>Threatened and protected species</u></p> <ul style="list-style-type: none"> • Central Sandy Bushveld — Vulnerable • Springbokvlakte Thornveld — Endangered | <ul style="list-style-type: none"> • Although majority of the proposed road upgrade will be constructed on already degraded environment, certain sections of the road are located within sensitive environments. The mitigation measures associated with the anticipated impacts on these sensitive environments are included in Chapter 8 of the DBAR. Considering that the proposed development includes replacement of bridges and culverts within the watercourse areas, it is impractical to maintain buffer zones for such activities, as indicated in Section 1.5.5 of the DBAR. • Although majority of the proposed road upgrade will be constructed on already degraded environment, certain sections of the road are located within sensitive environments. The mitigation measures associated with the anticipated impacts on these sensitive environments are included in Chapter 8 of the DBAR. The biodiversity types, current conditions, protection status, anticipated impacts and mitigations were assessed and are provided in the Terrestrial Biodiversity Assessment Report (Appendix F1). |
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| | <ul style="list-style-type: none"> • Aquatic Ecosystem <p><u>O. Additional information</u></p> <ul style="list-style-type: none"> • Special attention should be placed on Aquatic culture and Riparian vegetation | <ul style="list-style-type: none"> • The wetland and aquatic biodiversity impact assessment revealed that the present ecological scores of the watercourses within a 500m radius of the site ranged between Moderately Modified (C) and Seriously Modified (E). The overall ecological importance and sensitivity for these watercourses were 'High'. The assessment found that the proposed road upgrade, bridges and culverts replacement will predominantly take place in already infilled and transformed areas directly adjacent to the existing R101 roadway within the existing road reserve. The main activities of concern will be blasting, excavation and temporary diversions of flow during construction phase which were assessed to be of 'High' and 'Medium' impact significance prior mitigations and 'Medium and 'Low' mitigations. However, small areas of wetland habitat will be lost during the widening of the R101. Although wetland habitat will be permanently lost, the intensity of the impact has been reduced by recommending means of improving the currently degraded state of the at-risk watercourses to a condition better than the baseline data presented herein. • As per the above response, it is anticipated that the bridge and major culvert replacements will have Medium to High impact on the watercourses which will affect the aquatic culture and riparian vegetation. Strategic construction measures, monitoring and rehabilitation measures have been recommended to ensure there is minimal environmental impacts on the water quality and aquatic biota. |
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| | | <p>P. <u>Summary of findings</u></p> <ul style="list-style-type: none"> • The segments of the R101 Road to be upgraded in the Basic Assessment Report (Page 16, Figure 4) are not correlating to the Biodiversity Report sampling points and as such a realignment is required. • The most sensitive ecosystem services under threat are Aquatic Habitats, Climate Change Resilience, and River Corridors, specific threats should be anticipated and mitigated effectively and sustainably. • All camps and material storage areas should be established on already degraded habitats (no natural remain) and away from water (and riparian vegetation). • An alien invasive species eradication management plan for during and post development should be developed and implemented <p>Q. <u>Recommendations</u></p> <ul style="list-style-type: none"> • It is recommended that the above comments are taken into consideration. | <ul style="list-style-type: none"> • Specialists assessments study area was exaggerated at the three realignment areas to assess a larger area than the actual proposed upgrade area. The aim of this process was to obtain a holistic environmental sensitivity in the case that the realignment were to slightly deviate. The proposed upgrade area largely within the existing road reserve of approximately 35 which has already been modified. • There EAPs and specialists have provided mitigations to guide SANRAL achieve its objective in the least environmental impact manner. • Potential construction camps identified are within the least sensitive environments outside of the CBAs, ESAs, heritage features and applicable watercourse buffer zones. • An alien invasive species management plan has been compiled and included as Appendix G3 of the DBAR. • All comments received from the commentary authority were taken into consideration and addressed in the best possible way in this comments and responses report. |
| <p>2</p> | <p>Waterberg District Municipality – Health Services and Air Quality</p> <p>Jubilant Rabalao and Vincent Raphunga Date received: 21st July 2021 Receipt Method: Email</p> | <ul style="list-style-type: none"> • Background <ul style="list-style-type: none"> ○ The Environmental Health office will look into overall effects, directly or indirectly of a proposed activity on the health of the population. It is important to note that health is influenced by a broad range of determinants. New development or activities may impact on these important health determinants, which | |

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| | | <p>lead to changes in health outcomes or the health status of individuals and communities. The health impacts which were identified in this proposed activity are as follows:</p> <p><u>Health determinants:</u></p> <ul style="list-style-type: none"> ○ Air quality ○ Noise pollution ○ Surface and ground water contamination ○ Waste management (general solid waste, hazardous waste and liquid waste including grey water and sewage) <ul style="list-style-type: none"> ● All these health impacts and their mitigation measures were addressed in the EIA report. <ul style="list-style-type: none"> ● Recommendations <ul style="list-style-type: none"> ○ It is recommended that the mitigation measures that are outlined in the EIA report and specialists report be implemented to avoid any negative health impacts that may occur. | <ul style="list-style-type: none"> ● The impacts and mitigation measures of the identified health determinants were indeed provided in Chapter 8 of the DBAR. The monitoring aspects of these impacts are outlined in the EMPr (Appendix G3). ● The provided mitigation measures will be applied and compliance monitoring of mitigations as stipulated in the EMPr will be assessed by the ECO on monthly basis during the construction phase. |
| 2.3 COMMENTS FROM THE INTERESTED AND AFFECTED PARTIES ON DRAFT BASIC ASSESSMENT REPORT | | | |
| 1 | <p><i>Interested and affected party</i> Hennie van der Merwe Email dated 25th June 2021</p> | <p>Good Morning As discussed telephonically, kindly let me know the address for the downloading of the draft basic assessment report (DBAR) for the propose upgrade of the R101 Section 8. (Modimolle).</p> | <p>Good Day Hennie,</p> <p>As per our telecommunication, herewith the link to the report and appendices: https://gladafrika.com/sanral-r101-dbar/</p> <p>All comments on the Draft Basic Assessment Report shall be submitted to GA Environment (Pty) Ltd by no later than the 16th July 2021 for the attention of Vukosi Mabunda through the use of the following means, Tel: 011 312 2537, e-mail: vukosim@gaenvironment.com or environment@gaenvironment.com</p> |

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| | | | Should you have any questions about any of the above, please do not hesitate to contact us. We look forward to your further participation in the project. |
| 2 | <p>Land owner Andre Opperman Email dated 1st July 2021</p> | <ul style="list-style-type: none"> • My name is Andre Opperman and I live on plot 46, Sussansvale, farm named Don Armaran. I would like to know the following please: <ul style="list-style-type: none"> ○ How many Ha of my farm will I lose due to the changes to the R101? ○ How much closer will the new R101 be, in meters, to my house compared to the current existing R101? ○ How will the blasting of the hill behind my house affect me? | <ul style="list-style-type: none"> • The details regarding the loss of land will be considered as part of the Land acquisition process. Land acquisition process can only be finalised once the Environmental approvals have been obtained. The land acquisition process is undertaken by SANRAL's property service provider. Although the land acquisition process would ideally have been in the advanced stages while finalising the Environmental approvals, SANRAL requires Environmental approval in order to conclude the land acquisition. It follows that in most cases SANRAL will first conclude the Environmental process before they conclude the Land Acquisition process, as the Environmental process will determine if the land to be acquired is viable. • Based on the preliminary designs, the new R101 Road at this realignment section will be offset by a maximum of 200m west. • A clear and well-drafted blasting specification will be prepared in consultation with a blasting specialist. SANRAL and the appointed Contractor would need to ensure that the Contractor appointed for the construction of the housing development applies the recommended blasting method that has been pre-determined to have the least impact on the site and its surrounding environment. All neighbouring properties will be informed at least 24 hours beforehand before blasting is undertaken. |

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| <p>○ How will I be compensated for the lost land, and how do you determine the value of the land, and when and whom will I have to negotiate with.</p> <p>○ Will heavy vehicles be allowed to use the new road, and if so how much will the noise levels increase.</p> <p>○ What happens to my livestock while the road is under construction, due to the fact that all the fences will be removed</p> <p>○ Will the ESKOM power supply to my house be influenced in any way while the road construction is under way?</p> <p>○ How will the entry and exit road onto my farm be affected or change.</p> <p>○ How will rain water drainage from the new R101 be handled?</p> | <ul style="list-style-type: none"> ● Please refer to comment on land acquisition above ● The upgraded road will still be a public road which will be available for trucks to use. Appropriate noise mitigation measures including traffic calming will be implemented based on the level of noise that will be generated during the construction phase. Complaints will also be reviewed and where noise complaints are raised, noise monitoring may be considered. It has been noted that most of the trucks prefer the Eersbwoond road which links Bela Bela and Modimolle as it is much easier for heavily vehicles. ● It is anticipated that road killings of animals associated with the road upgrade may increase especially at the realignment areas as it is noted to be a busy road with significant traffic volumes flowing at approximately 100km/hr. It is proposed that the road servitude will be fenced off from the adjacent private game farms to reduce any potential animal road killings. ● It is not anticipated that the electrical supply into the proper will be influenced by the construction activities. Measures will be put in place to avoid any electrical disturbances as far as possible. ● As per the preliminary designs, there are no entry or exist points onto the farm that will be affected by the upgrade specifically at the realignment section. ● The Design Engineer has allowed for adequate drainage in all infrastructure (road, culverts, bridges, etc.,) that has a potential to cause stormwater or drainage problems. A hydrological and hydraulic analysis has been undertaken in |
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| | | <p>○What happens to the excess material removed during the construction process of the new R101?</p> | <p>accordance with the SANRAL drainage manual and was used in determining flood peaks for the major culverts and the bridges. Based on the hydrological analysis, the upgrade of the stormwater infrastructure will be effectively addressed. It is a recommendation of this Basic Assessment process that a stormwater management plan be compiled and implemented by the Contractor in order to address issues of increased surface water run-off rates and volumes and their erosion potential.</p> <ul style="list-style-type: none"> ● It is the understanding of GA Environment that the concrete waste material from the bridge and culvert demolitions may be crushed and reused. Furthermore, the material from the realignment cuts may be crushed to G5 material and utilised for subbase layer during the upgrade. It is expected that some of the material may be left in the properties to be acquired by SANRAL (currently ongoing). The anticipated volume required for the upgrade from waste material is approximately 120 000 m3 crushed G5. Detailed information will be made available to the ECO during the planning phase to ensure that such activities are within the National Environmental Management: Air Quality Act, No 39 of 2004 (AQA) standards and the activities are not located within any sensitive environments. The crusher plant should be within the designated construction camp and material laydown area approved by the ECO. It must be noted that waste from the demolitions, if it cannot be reused, be disposed at registered landfills (Bela Bela Local Municipality Landfill and/or Modimolle Local Municipality Landfill). |
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| 3 | <p>Land owner Janine Dinkelmann Email dated 13th July 2021</p> | <ul style="list-style-type: none"> • I'm the owner of Buyskop 464 KR portion 18. Herewith my comments regarding the proposed R101 road upgrade as per the preliminary design report: <ul style="list-style-type: none"> ○ Due to the widening of the road, a number of fixtures on my land would have to be relocated/moved in the process, including the electric fence, solar driven electric gate, borehole and water tank. I'd like to confirm that the full cost of this would be covered by the project. ○ In addition to the point above regarding the widening of the road, I would need to give up a section of my land on both sides of the road. I'd like to confirm that I'd be compensated for this at a fair market-related value. ○ The report mentions that a 4 lane urban configuration with raised median and sides is planned for the section of the road exiting Bela-Bela. This is a serious concern as I run a business on one side of the road and the curbed median would prohibit or restrict access from Modimolle's side. I'd like to request that this is considered as part of the design as it could have dire consequences for myself and other businesses along this section. | <ul style="list-style-type: none"> • The details regarding the loss of land will be considered as part of the Land acquisition process. Land acquisition process can only be finalised once the Environmental approvals have been obtained. The land acquisition process is undertaken by SANRAL's property service provider. Although the land acquisition process would ideally have been in the advanced stages while finalising the Environmental approvals, SANRAL requires Environmental approval in order to conclude the land acquisition. It follows that in most cases SANRAL will first conclude the Environmental process before they conclude the Land Acquisition process, as the Environmental process will determine if the land to be acquired is viable. • The comment has been provided to BVi Engineer's attention and will be taken into consideration. |
| 4 | <p>Business owner Freddy Tau Email dated 30th July 2021</p> | <p>NT Close Protection - Application For Database</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will be informed of all developments on the project</p> |

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| 5 | <p>Business owner Ngoatlo Phillimon Email dated 1st August 2021</p> | <p>Reapplication for database. Please find the attachment of documents of ramatlo security services, regarding the proposed upgrade of national road R101 section 8 from Bela Bela (km0. 0)to modimolle</p> | <p>Thank you email. The recruitment process which will be undertaken during the construction phase is regarded to be outside the scope of this Basic Assessment. There is however a likelihood of temporary employment during the construction phase of the project. The Contractor is expected to recruit skilled and semiskilled labour during the construction phase where feasible. At this stage our client is not hiring anyone as construction is only scheduled for April 2022.</p> <p>Your details were already included in the Interested and Affected Parties (I&APs) Database and you will continue to be informed of all developments on the project</p> |
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| 2.4 COMMENTS DURING THE INITIAL PUBLIC PARTICIPATION PROCESS | | | |
| A. REGISTRATION WITH THE PROJECT | | | |
| 1 | <p>Land owners Adri Uys and Peter Howard Email dated 31st March 2021</p> | <p>We would like to be registered on the Project database.</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will be informed of all developments on the project</p> |
| 2 | <p>Adjacent Business Johan Breytenbach Email dated 1st April 2021</p> | <p>I would like to be registered on the Project database.</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will be informed of all developments on the project</p> |
| 3 | <p>Director: Waterberg Tourism Dr Syd Catton Email dated 1st April 2021</p> | <p>Kindly register me as an Interested and Affected Party in the basic assessment of National Road R101 and Water Use Authorisation Process</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will be informed of all developments on the project</p> |
| 4 | <p>Community Member Joseph Motea Email dated 1st April 2021</p> | <p>I would like to register with the project as a small and medium-sized enterprises (SME)</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will be informed of all developments on the project</p> |
| 5 | <p>Land owner Hennie van der Merwe Email dated 6st April 2021</p> | <p>I would like to register with the project a land owner of stand 157</p> | <p>Thank you for your response. Your details have been added on the project Interested & Affected Party database and you will receive future correspondences regarding the project.</p> |

B. ENGINEERING SERVICES

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| <p>1</p> | <p>Land owner JB Espanach Email dated 7th May 2021</p> | <p>Request to discuss stormwater issue.</p> | <p>Thank you for your comment. An email was sent to the I&AP on the 11th of May 2021 requesting further details regarding the stormwater issue/s so we can adequately address the concern/query.</p> <p>The upgrade of stormwater has been identified as a triggered activity in terms of the NEMA EIA Regulations, 2014 as amended and the associated impacts are assessed as part of this Basic Assessment. The road currently has poor drainage as the associated infrastructure such as culverts have insufficient capacity and/or are blocked. It is intention of the project to upgrade the existing stormwater associated with the road.</p> <p>In addition to this, the project is also undertaking a Water Use Application process for the proposed upgrades along the road including the replacement of the Modderloop and Groot Nyl River Bridges and three major culverts as well as the repairing of 55 minor culverts to ensure stormwater is effectively managed.</p> <p>The Design Engineer has allowed for adequate drainage in all infrastructure (road, culverts, bridges, etc.,) that has a potential to cause stormwater or drainage problems. A hydrological and hydraulic analysis has been undertaken in accordance with the SANRAL drainage manual and was used in determining flood peaks for the major culverts and the bridges. Based on the hydrological analysis, the upgrade of the stormwater infrastructure will be effectively addressed. It is a recommendation of this Basic Assessment process that a stormwater management plan be compiled and implemented by the Contractor in order to address issues of increased surface water run-off rates and volumes and their erosion potential.</p> <p>The layout showing storm water management along the sections of the road is presented in Figure 4 of the Draft BAR and additional details are available on request.</p> |
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C. ENVIRONMENTAL HEALTH

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| 1 | <p>Head of Health Services: Waterberg District Municipality Jubilant Rabalao Email dated 6th April 2021</p> | <p>I am an environmental health practitioner and would like to know about the waste management plan, prevention of groundwater contamination and prevention of other health impacts.</p> | <p>Thank you for response. The Basic Assessment process has identified the generation of waste during the construction phase that will require management by all parties that will be involved. It is a condition in this report that all waste be managed in accordance National Environmental Management Waste Act, 2008 (Act 59 of 2008); in order to avoid or reduce unnecessary generation of waste. Where the waste is generated, measures such as re-using, recycling and recovery of waste shall be encouraged. These general principles of responsible waste management are also incorporated in the EMPr to manage waste related activities during construction.</p> <p>The EAP will be in continuous engagement with the project team and undertake monthly environmental compliance audits to ensure the project is undertaken in an environmental sustainable manner.</p> |
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D. TECHNICAL ASPECTS

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| 1 | <p>Landowner Adri Uys Email dated 31st March 2021</p> | <p>Concerned about entrances to internal roads and property fences.</p> | <p>Thank you for your comments. The Access will be moved to ±km 10.9 and a gravel road will be provided to tie with the existing gravel road.</p> <p>The construction phase will be undertaken in sections and traffic flow will be allowed throughout the project without blocking any entrances/exit points along the R101. Should any intersection undergoing upgrades at the time be temporary unavailable for public access, a temporary alternative road will be provided.</p> <p>The current R101 Section Road has a reserve of 35m defined by the fences parallel to the road. The proposed design does not go beyond the existing fences with the exception of the realignment areas where consultation is currently underway with the landowners. The Contractor is also expected to compile a Traffic Management Plan to guide the management issues during the construction phase and all construction will be undertaken in accordance terms of National Traffic Act 93 of 1996.</p> |
| 2 | <p>Landowner Vusi Dhladhla</p> | <p>Was not consulted about the Stakeholder participation. Just got a booklet with unreadable small fonts.</p> | <p>Thank you for contacting us. Your details have now been added on the I&AP project database. A pdf version of the Background Information</p> |

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| | Email dated 9 th April 2021 | Will there be explosive used in the process? | <p>Document was sent to the I&AP on the 13th of April 2021 for easier reading and understanding of the project. A copy of the Draft BAR will also be distributed for your further comment and review.</p> <p>The bridges and major culverts will be demolished manually using hydro-cutting, saw-cutting, jack-hammers and excavators. The realignment cuts will however involve blasting. The use of explosives will be done in line with the requirement of the Health and Safety Act where applicable.</p> |
| E. OBJECTION | | | |
| 1 | <p>Interested and Affected Party Doctor Andre Ebersohn Email dated 10th May 2021</p> | <p>Strongly opposes to the proposed upgrading of the R101 between Bela Bela and Modimolle.</p> <p>The area is largely a nature conservation area. Most farms are game farms, and the others are mainly retirement estates. Influx traffic is not ideal for the area. It is also not true that there ever is traffic congestion. The road is, barring a few patches and places where the shoulders have been eroded away, as well as the first three or four kilometres from Bela Bela, in a perfectly sound condition, and this whole proposition is not only uncalled for, but a gross waste of public funds.</p> <p>The winding road is part of the enchantment of this beautiful nature area. Straightening it out and making it wider will invite speedsters and noisemaking cars, trucks and motorcycles onto the road that do not belong here. This is a sanctuary for game and people who deserve to live quiet, peaceful lives. Please do not convert it into a racing track or a transport vehicle driveway. There will be more frightening accidents and collisions and killing of wild animals, destroying our beloved resort.</p> <p>There is no industry or business centres here that require more traffic. Leave good enough alone. Stay on the highway with you traffic, please.</p> | <p>The upgrade of R101 is done to improve safety. The road currently does not comply with SANRAL geometric standards. A traffic study was also conducted to look at the possible attraction the upgrade would have on traffic from the N1 toll road and the outcome showed that the improvement will not have any significant impact.</p> <p>The upgrade generally consists of adding surfaced shoulders and aligning 3 curves to provide a consistent design.</p> <p>These are all road safety additions.</p> |
| F. GENERAL | | | |
| 1 | <p>Director: Department of Transport Dikotso Sekatane Site visit undertaken on 3rd February 2021.</p> | <p>The R101 Section 8 is in a better condition than the section between Hammanskraal and Bela Bela. It would be better to upgrade that section instead.</p> | <p>The section of road (R101 between Hammanskraal and Bela Bela) does not fall under SANRAL jurisdiction it falls under Limpopo department of</p> |

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| | | | public works, roads and infrastructure and regarded to be outside the scope of this Basic Assessment. |
| 2 | Planning & Economic Development Bela Bela Local Municipality Themba Mnisi Email dated 13 th April 2021 | This email serves to confirm that we have received your email and noted its content, Ms M Manzini who is the Manager Town Planning will be your contact official from Bela-Bela Planning Department to assist in planning matters relating to the participation processes as indicated in your email, I suggest that you also contact our Bela Bela Technical Services Department for other relevant comments that may be necessary for your processes. I have copied them in this correspondence | Thank you for your comment. Mr Mnisi has been included in the I&AP Database and will be informed of all developments on the project. |
| 3 | Landowners / Neighbourhood Watch Adri Uys and Kobus Germishuys Email dated 15 th April 2021 | Good day Vukosi, I am also a member of our neighbourhood watch – Kariba buurtwag - and our area stretches from Bosveld Diesel up to the end of Verloren Estate on both sides of the R101. Myself together with Kobus Germishuys will be the contact persons for the relevant meetings and communications. Kobus has property that borders and cross the R101 | Thank you for your email and the information. We have added the neighbourhood watch and Kobus onto the I&AP Database. We will communicate with you going forward. |
| 4 | Community Member Nkele Letlhaka Email dated 23 rd April 2021 | Looking for a job. | Thank you comment. The recruitment process during the construction phase is regarded to be outside the scope of this Basic Assessment. There is however a likelihood of temporary employment during the construction phase of the project. The Contractor is expected to recruit skilled and semiskilled labour during the construction phase where feasible. At this stage our client is not hiring anyone as construction is only scheduled for April 2022. Your details have however been added you to the Interested and Affected Parties (I&APs) Database and you will be informed of all developments on the project |
| 5 | Land owner Vusi Dhladhla Email dated 23 rd April 2021 | Can provide land during construction phase and also plant hire. | Thank you for your comment. The client may engage you towards the construction phase of the project to find out more information. |
| 6 | Director: Waterberg Tourism Dr Syd Catton Email dated 7 th May 2021 | Could you kindly give me the name of the SANRAL engineers planning the upgrade to the R101 as I have some suggestions as to how to improve their plans, which should save them money. I have registered as an IAP with you | A contact was established with the interested party and the suggestion were taken into consideration. |

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| 7 | <p>Director: Waterberg Tourism Dr Syd Catton Email dated 11th May 2021</p> | <p>Thank you for contacting me. We are a non-profit company working with the Waterberg Sakekamer and PPGI (Public Private Growth Initiative) to realise the President's District Development Model for Waterberg.</p> <p>What the area needs is bypasses around each town so that the mining trucks will not interfere with the tourists and residents of each town. So on the upgrade of the R101 we see the following:</p> <ul style="list-style-type: none"> • Minor changes in the S bends north and south of Verloren will make the road safer • Taking out the bends entirely one will make the R101 many times safer, for ever. By digging a tunnel through Cussonia and Verloren 3, (the new ZA Cheetah Conservancy) then swap enough land on the southern borders of Sussensvale 35, 46, 45, 51 and 69, as well as Lapha 715 for the same amount of land on each farm's northern border – the current R101. • Leave enough of the present R101 from Bela Bela for access to Verloren Estate, Tweefontein 463 KR ptn 71 and ZA Cheetah Conservancy on Verloren 3. • It may be more expensive doing the road to the standards of Chinese highways, but the saving in expropriation costs by simply swapping land on these farms could offset the extra tunnel costs over the present plan. • More importantly is to create bypasses around Vaalwater, Modimolle and Bela Bela in particular. • The next priority would be to create bypasses around Modimolle and Bela Bela so trucks are routed away from these tourist centres. <p>A public participation meeting will be appreciated</p> | <p>Thank you for your comment and suggestions. Your details have been added on the project database and you will be informed of all project development.</p> <p>Some of the proposal/ suggestions were taken into considerations and align with the strategies proposed by Engineers. Whereas some suggestions were found not to be feasible and economical, i.e. the cost of building a tunnel is significantly higher compared the cost of the land acquisition.</p> <p>Bypass roadway will not only attract the truck traffic, but will attract traffic in general. A bypass usually have a negative economic effect on towns and centres.</p> <p>The need of the public meeting is dependent on the nature of the comments that will be raised by other Stakeholders and I&APs during the review of the Basic Assessment report. GA Environment is however available to hold a focus group meeting with your organisation to discuss all issues that you may have on the project. It must however be noted that such meeting must follow the Directions from the Minister regarding the combat of COVID 19. Should such a meeting be required, it is likely that the meeting will be held through a virtual platform (Microsoft Teams) to manage the spread of the Corona virus.</p> |
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3 SUMMARY COMMENTS AND CONCLUSION

The comments captured in this report were obtained during the Notification Phase and during the availability of the Draft Basic Assessment Report (Revision 1). A summary of the comments received is outlined as follows:

- Registering as an interested and affected parties;
- Competent Authority requirements and guidelines;
- Sensitivity of the surrounding environment;
- Specialist studies and methods used;
- Water quality and biomonitoring;
- Biophysical and health impacts;
- Impact mitigations and monitoring;
- Potential construction camps;
- Stormwater infrastructure; and
- Extent of the upgrade area;

All comments received at the time of compilation of this report were included in this report and addressed as adequately as possible. All comments received on the Revised Draft Basic Assessment Report will be included in the Final Comments and Responses Report which will be submitted to DFEE along with the Final Basic Assessment Report.