

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| | <p>2. RISK : SCHEME ABANDONMENT</p> <p>The EAP Response is unsatisfactory, in that it glosses over the very real problems faced by SFPO NPC in ever sourcing enough funding for the Scheme.</p> <p>In the 3 months that have elapsed since the initial Comments, there has been no new public information from SFPO NPC w.r.t. confirmation of the sources of funding necessary for the Scheme, even if constructed on a “controlled phased” basis.</p> <p>Regardless of the reassuring words in the Response, there is nothing that changes the financial risks attached to this Scheme, and a serious risk remains that the work on the Scheme could be abandoned at a partially completed construction stage/phase before completion due to the cessation of funding.</p> <p>This perception is confirmed by the sudden admission SFPO NPC made recently to DEDEAT that the real timeline for the Scheme was likely to be 10 – 20 years, and not the currently publicised maximum of 10 years.</p> | <p>Construction of a phase will not commence before sufficient funding has been secured to complete construction of that particular phase. There will therefore never be partially completed infrastructure.</p> <p>In the meeting held with DEDEAT on 1 March 2019 the Municipal Manager made it clear that funding will be derived from a combination of private, public and governmental funding.</p> | <p>A phased implementation of the coastal beach protection infrastructure will most likely be required due to financial constraints. Should funding for the full scheme be available at the time of construction then the full scheme will be developed. However, the design of the scheme is such that each phase can be regarded as a standalone project, allowing for funding for additional phases to be sourced prior to their construction. As funding becomes available, each of the phases would be reviewed and revised, as necessary prior to implementation.</p> |

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| | | | <p>As is the case with any project, cost estimates become more accurate as a project progresses through the various stages of project development. A detail design cost estimate is more accurate than a preliminary design cost estimate. The final cost of a project will only be known upon completion of a project. The preliminary design cost estimate available at this stage is regarded as appropriate for the purpose of this EIR. A fairly accurate project cost will be known once tenders to carry out construction work are received. An adequate contingency amount will be allowed for at tender stage, and SFPO NPC has confirmed that no construction work will commence unless sufficient funding to complete any phase of</p> |
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| | <p>3. RISK : DAMAGE TO EXISTING SURFING BREAKS The EAP Response that <i>“The length of the groyne and width of the beach nourishment for the proposed scheme are not large enough that it will affect the breaks”</i> is completely unsubstantiated and is questionable in the absence of any previous investigation, research or computer modelling.</p> <p>I again submit that this aspect must be addressed by the appropriate responsible parties during the EIA processes and before proceeding with the Scheme</p> | <p>This will be addressed during the EIA phase.</p> | <p>the scheme has been secured.</p> <p>The Seal Point Boardriders Club declared that they are fully behind the construction of the groyne at St Francis Bay. Various discussions have been held with members of the club, and their input has been fed through to the Coastal Engineers. The input received from the surfing community led to amended groyne placement and orientation. The supplementary shoreline modelling performed by Advisian was based on this amended groyne layout.</p> |
| | <p>5. OPPORTUNITY : CREATION OF NEW SURFING BREAKS The EAP Response regarding the establishment of artificial surfing breaks is noted. Unfortunately, it comes across as unnecessarily negative, is very generalised and hence needs review and updating to accommodate a more recent perspective.</p> | <p>This will be included in the EIA phase.</p> | <p>The Seal Point Boardriders Club declared that they are fully behind the construction of the groyne at St Francis Bay. Various</p> |

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| | <p>The statement that “groynes as they are schematized now are also considered to be too short to significantly impact surf zone conditions” is completely unsubstantiated and is questionable in the absence of any previous investigation, research or computer modelling.</p> <p>I therefore again submit that the present design brief should be amended to include, as a secondary objective, the creation of surfing breaks at the groynes. I believe this could be achieved by careful consideration and implementation of the existing wave research, computer modelling and the technology available to create consistent high-quality surfing waves.</p> <p>This one-time opportunity should be seized now - it could become an enormous asset to St Francis Bay and Kouga, and a significant commercial and developmental contribution to the Kouga IDP.</p> <p>The EAP Response states that the SFPO NPC has been “<i>approached by the surfing community</i>”, who expressed their support for the proposed Scheme.</p> <p>I am not aware of any “surfing community” organisation in St Francis Bay. It would therefore be appreciated if SFPO NPC would divulge who this community is, and why they have seen fit to assign to it to the mandate to speak on this issue – an issue which is of interest well beyond St Francis Bay and extends to the wider surfing community, both nationally and worldwide. It is suggested that it would be beneficial to the Scheme to establish a representative structure to collaborate on this issue.</p> | | <p>discussions have been held with members of the club, and their input has been fed through to the Coastal Engineers. The input received from the surfing community led to amended groyne placement and orientation. The supplementary shoreline modelling performed by Advisian was based on this amended groyne layout.</p> |
| <p>Louis Fouché louis.fouche@telkomsa.net</p> | <p>The quick discussion I had with you after the meeting last evening refers. As requested, herewith the points I raised with you:</p> <ol style="list-style-type: none"> 1) Is there scope for emergency maintenance/repairs to a certain section(s) of the Kromme River which have become dangerous due to silting up of the navigable channel? The “Z area” opposite Rivertide, generally referred to as “The Drift”, has now become so bad that it is impossible to pass through this section with a craft at low tide. Currently, occupants have to get out and push/pull the craft through this section. This creates a danger for visitors and other users of the River who are unaware of the sandbar at this point. Should the sandbar in the navigable channel be hit at speed it can result in serious injury (possibly even loss of life) to craft | <p>Noted. This safety concern will be added to the EIR and incorporated into the need and desirability for the project.</p> | <p>Included in Section 4 of the EIR.</p> |

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| | occupants. Commercial Operators are now restricted to operate when the high tide window period occurs. Furthermore, as the window period changes daily, it makes operation at regular times impossible. This creates a problem for these operators as well as their clients not having fixed operating hours which obviously has an impact on their business, tourists and tourism in general. | | |
| | 2) In our opinion, this has become a serious and unacceptable matter which needs to be attended to in order to avoid possible serious injury/loss of life and claims. To the best of our knowledge, the Municipality has been given permission to authorise emergency repairs to be done in the event of a breach of the Spit. In our view, the current situation regarding this particular section of the River can be seen in a similar light as a real and serious emergency. Therefore, dredging of this small section should be allowed as an emergency maintenance/repair in order to create a safe environment for all users of the River at all times. The December holiday period is only 3 months away and the emergency maintenance/repair has to be completed before then and definitely before the holidaymakers and tourists arrive failing which the risk of accidents and serious injury remain a real possibility. | There are a number of other measures that need to be implemented prior to an emergency situation being established. This includes signs, detailed instructions / maps available for the estuary with regards to hazards. The relevant association would also need to establish an emergency response procedure. | Responded to and incorporated at scoping phase. |
| | 3) A further very serious and dangerous matter has come to my attention after our discussion yesterday evening. Some years ago some of the Chokka boats would enter the River through the mouth and anchor the boats just below the bridge over the Kromme River on the northern bank of the River where there was a big concrete block and a 4 metre metal beam buried in the sand. Over the last few months the sand bank in the middle of this part of the River has moved much closer to the northern bank which has caused the carving away of this section of the river bank causing the navigable channel to move in that direction too. The result is that this concrete block and the metal beam is now exposed in the navigable channel and both are visible and protruding above the water at low tide. During high tide they are submerged and cannot be seen. This is a big danger for craft passing through this area as there is a real chance of hitting one or both of these obstacles with substantial damage to craft as well as possible serious injury to occupants. It would | These hazards would need to be marked accordingly. | Responded to and incorporated at scoping phase. |

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| | <p>appear that it will be possible to get to and remove the concrete block and the metal beam during low tide and permission has to be given for this to be done urgently and definitely before the start of the holiday season.</p> | | |
| | <p>Will you please raise these matters at your meeting with Environmental Affairs tomorrow as we are very concerned about the current state of affairs regarding particularly the two raised herein. Permission and authority must be obtained from the powers that be to urgently address these matters.</p> | <p>The matter was raised with the DEDEAT during the meeting held on the 29th of August 2019.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| <p>Dave Hurr davehurr@computingservices.co.za</p> | <p><i>With reference to the comments submitted by Mr Louis Fouché (above):</i> I think both these matters are of extreme urgency and agree with you need immediate attention</p> | <p>Noted.</p> | |
| <p>Andrew Bowren 082 562 4273 ajbowren@gmail.com</p> | <p>I attended the Public Feedback meeting held in St Francis Bay on 27 October 2019.</p> <p>Generally, I guess, the written feedback you receive either involves some form of objection or a range of queries.</p> <p>In my case, I wish to congratulate your team on a professional job thus far. Your feedback was clear, concise and all questions raised were addressed.</p> <p>The proposed Coastal Protection Scheme is extensive and the process of addressing it is huge. Over many years now, close to nothing had been done to address the issue. This is for a range of reasons, not least of all an inordinate amount of objections to any proposal tabled. It is now time to rather find reasons <u>why we can</u> make progress as opposed to many reasons <u>why we cannot</u>.</p> <p>The process embarked upon, initiated by the SFPO – NPC, together with your team deserve all the support we as property owners and interested parties can give.</p> <p>Good luck and may we keep the momentum going.</p> | <p>Noted.</p> | |
| <p>Calvin Smith 078 710 7527 Calvin.smith33@outlook.com</p> | <p>My name is Calvin Smith and I am a resident of Cape St Francis. Please find attached a few perfunctory comments on the environmental scoping report for the proposed coastal protection scheme in St Francis Bay.</p> <p>1. Page 47 paragraph 2: “Estimates for the total amount of sediment moving around Cape St. Francis from west to east vary between 50 and 100 thousand cubic meters</p> | <p>Noted.</p> | |

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| | <p>per year. Illenberger (2001) estimates a range of 80 – 100.000 m³ per year while the Entech (2002) report gives a wider range of 50 – 100.000 m³ per year. Of this total amount, the transport is divided between wave driven littoral transport along the coast and around the headland, and wind driven (aeolian) transport across Cape St. Francis through the headland bypass dune systems. It is believed that the largest fraction of the total sediment transport across the region is through aeolian processes moving sand through the dune fields (ASR Ltd, 2006).”</p> | | |
| | <p>a. The volume of sediment moving around the cape stated above is possibly too high. May these volumes rather refer to the sediment transported from the now defunct Oyster Bay, Thysbaai and Santareme Dune systems in the past (circa. 1960)? Only the Shark Point headland by-pass dune field is currently in operation and according to McLachlan <i>et al.</i> (1994) it transports 7000m³/y only although Illenberger (20??) gives a value of 8000 m³/y.</p> | <p>The total sediment budget reported in the Scoping Report is derived from previous studies. The EAP understands that the 50 000 m³ to 100 000 m³ refers to the transport of sediment due to wave and aeolian transport.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>b. I guess there will be future studies to verify the volumes in the reports/papers above and establish a relatively accurate sediment budget. There should be a need to determine the volume of sediment longshore drift transports around Shark Point as it may impact future nourishment efforts.</p> | <p>Noted.</p> | <p>Studies of sediment budget informed the preliminary design. Monitoring during the operational phase of the project will determine how much sediment is entering the nourished area and how much is moving past the scheme and further north.</p> |
| | <p>2. Page 47 Paragraph 3: “The net shoreline retreat along the St Francis Bay beach has been approximately 30 m to 50 m over the past 30 years. This has resulted from</p> | <p>Noted.</p> | <p>Yes. What this means is that the beach is</p> |

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| | <p>increased sediment carrying capacity within the lower reaches of the Kromme Estuary, resulting in less sediment available to accumulate on the St Francis Bay Beach.”</p> | | <p>retreating by 1m a year. This is very significant. The worst case scenario for sea level rise is about 1cm per year, which would equate to centimetres of retreat.</p> |
| | <p>a. On page 46 paragraph 2 the report states that longshore drift transports sediment to the east along much of the coast. How much sediment, if any, is the Kromme estuary expected to supply to the St Francis Bay beach in the south west considering the longshore drift direction? I presume that the spit close to the river mouth would benefit.</p> | <p>The contribution of sediment from the estuary to the longshore drift through natural processes is expected to be low. This is due to the estuary being flood tide dominant with sediment moving into the estuary rather than out. Sediment is likely to move out of the estuary during heavy rains / flooding events. Under the flood tide dominant conditions sediment is likely to accrete near the sandbank at the mouth of the estuary.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>b. Multiple workers have attributed beach erosion at St Francis Bay to the stabilisation of the Oyster Bay, Thysbaai and Santareme Dune systems. According to McLachlan et al. (1994) less than 10% of the pre-stabilisation sand is now reaching the beach. I feel it is necessary to state that the primary cause of beach loss was due to the</p> | <p>Noted.</p> | <p>The comment is scientifically accurate and confirms that the system has been</p> |

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| | <p>stabilisation of the headland by-pass dune fields unless evidence is provided which strongly argue otherwise.</p> | | <p>altered due to the dune stabilisation, based on published information. Thus, we are now dealing with a modified system that requires active management intervention.</p> |
| | <p>i. See extract from Appendix F: Advisian preliminary design report: “The sandy beach at St. Francis Bay has suffered from significant erosion events over the past few decades which can be attributed to the stabilisation of large headland bypass dune-fields during the 1970’s and 1980’s. This has led to a reduction in sediment supply to the beach which resulted in a rapid retreat of the shoreline.”</p> | Noted. | |
| <p>Norman Dyer dyerndd@gmail.com</p> | <p>I note the KJRC is not registered as above? I have always thought it to be sufficient to be part of the SFPO application, would it not be good practice to register ourselves anyway? Your thoughts please.</p> | <p>The Kromme Joint River Committee (KJRC) has been added to the list of Interested and Affected Parties (I&APs) and will thus be informed as the EIA process progresses.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>Thank you for this, kindly add Louis Fouche and Ken McGregor, copied herein as Exco members of the KJRC NPC to future distributions. We will respond in due course with our detailed motivation to support the initiative. Good luck in your endeavours.</p> | Noted | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>Please find attached a letter confirming our full support for the above scheme. Kindly acknowledge receipt of this communication. Thanking you and good luck.</p> | Noted | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>We write as custodians, on behalf of the Kouga Local Municipality (KLM) of the Kromme and Geelhout Rivers as vested in us by virtue of the MOA signed between the KLM and the KJRC NPC dated September, 2016.</p> | Noted. | <p>Responded to and incorporated at scoping phase.</p> |

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| | <p>The KJRC is comprised of representatives of all registered estates/communities, the names of which appear at the foot of our letterhead abutting the Kromme and Geelhout Rivers and in some instances indirect representation of some of the independently owned properties. The number of property owners directly represented amounts to 185 home owners whilst those independently owned amount to a further approximately 20 properties.</p> <p>Having attended all of the presentations and having read the Draft Scoping report as presented at the public participation meeting held on 27 August in St Francis Bay we wish to record our full commitment and support of this urgently required initiative.</p> <p>We compliment CES on the very thorough and detailed report compiled and made available for comment. Whilst we understand there will be ‘mechanical’ challenges in the implementation of the sand sourcing requirement which can and will be overcome we place on record that the Kromme/Geelhout properties and the KJRC itself have already initiated financial provision for the function of sand removal from the lower reaches of the Kromme. We wish to add how EXTREMELY urgent the matter of ‘dredging’ the navigable channels of the river are presently, as in certain sections, particularly at low tide the river is not only un-navigable but has become extremely dangerous for boating (some 1400 craft are registered annually for permission to use the Kromme) and swimmers alike.</p> <p>The draft scoping report, 6.8.4. Socio-Economic value refers. The Kromme River not only represents a major capital investment in the Kouga area but most significantly the Kromme Estuary is in itself a major tourist attraction - boating, angling, commercial tourist cruises, etc.</p> <p>The narrowing and silting of the navigable channels, we recognise is a result of historical human interference in the natural structure and flow of the river i.e. construction of dam(s), the creation of the canal system, rerouting of the sand river, the development of the village of St Francis Bay itself and adjacent Santereme residential area, etc have all contributed to the crisis we face now.</p> <p>These factors are irreversible and therefore the necessities re-nourish the beach as proposed in the ‘Coastal Protection Scheme’ and to source the sand required from the Kromme River is of paramount and urgent need.</p> | | |

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| | <p>We sincerely hope that your endeavours regarding this EIA application receive favourable support from both Governmental Authorities and those registered as I&AP's in order to proceed with this project as soon as is possible and assure you and as we will do for the contractor, when appointed of the full support of the Kromme Joint River Committee as reconfirmed and recorded in the minutes of our meeting held on 16 September, 2019.</p> | | |
| <p>Maggie Langlands maggielanglands@gmail.com</p> | <p>PROPOSED COASTAL PROTECTION SCHEME, ST FRANCIS BAY: COMMENT</p> <p>Having read the background information document, the draft scoping report and the estuarine impact assessment, as well as attending the public meeting held on 27 August in St Francis Bay, the Kromme Enviro-Trust is satisfied that the process being followed is a sound one and that a thorough and professional approach is being adopted.</p> <p>We recognise the need to retard and reverse the erosion of sand from the beach and spit, and our preliminary evaluation is that responsible dredging of sand from the river is acceptable, with mitigation.</p> <p>We reserve our response regarding environmental impacts, as it is too early in the process for us to comment, except in the case of the estuarine impact assessment. We note the mitigation measures recommended by the specialist and strongly support these measures, particularly with regard to:</p> <ul style="list-style-type: none"> • Identification and avoidance of sensitive habitats • Removal to the beach of only the correct size material and only the required volume • Restriction of access to the foredunes <p>We record, in addition, our support for a walking route along the length of the frontage along the beach and estuary.</p> | <p>Noted.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| <p>Patrick Billson 082 552 4099 patrick@billsontrucks.co.za</p> | <p>We as the members of the Riverglades Homeowners Association NPC (RGHOA) which represents 20 homeowners fully supports the proposed dredging of the Kromme river in an effort to preserve the natural tidal flow of the river and to ensure the safety and navigability of the river.</p> | <p>Noted.</p> | <p>Responded to and incorporated at scoping phase.</p> |

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| <p>Simon Picton-Tuberville 042-294 0079 admin@sfbra.co.za</p> | <p>DRAFT ENVIRONMENTAL SCOPING REPORT PROPOSED COASTAL PROTECTION SCHEME, ST FRANCIS BAY, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE DEDEAT REFERENCE NUMBER: EC08/C/LN2/M/42-2019 We refer to the abovementioned report as well as the public meeting held in St Francis Bay on the evening of 27 August 2019 when this report was presented. The St Francis Bay Riparian Homeowners Association as the custodians of the “ St Francis Bay canal system” have a vested interest in the “Proposed Coastal Protection Scheme” which will have a beneficial impact on the protection of the canal system, in particular “The Spit”, which at the same time provides a valuable public amenity. We note that the Draft Scoping Report addresses environmental aspects associated with both “The Spit” as well as “The Beach” and we wish to record our support for this project in its entirety. We further note that the St Francis Bay Riparian Homeowners Association have committed to make funding for this project, have already made financial contributions and will continue to do so.</p> | Noted. | Responded to and incorporated at scoping phase. |
| <p>Linda Evans Lndevans5@gmail.com</p> | <p>Attached, please find the letter with reference to the above from the Kromme-Geelhout Conservancy. Any queries may be directed to myself.</p> <p>We write in full support of the initiative to renourish the St Francis Beach and more specifically the need to obtain sand, as required, from the Kromme River.</p> <p>Our conservancy, registered as 'a protected environment' represents twelve property owners who have river frontage to their properties of some ten kilometres of the upper reaches of the Kromme and Geelhout rivers.</p> <p>The need to dredge the river is an issue needing urgent attention as at low tide especially the river has become unnavigable in places and certainly poses a serious safety risk to craft and its occupants should: a) boats collide in attempting to navigate very narrow and shallow channels b) we are unable to access the lower reaches of the Kromme at low tides.</p> | Noted. | Responded to and incorporated at scoping phase. |
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| | <p>Further as a result of the now restricted tidal flow we, of the upper reaches have observed that silting is affecting the depth and width of the rivers adjacent to our properties.</p> <p>We congratulate you on the very professional approach to this most sensitive matter, assure you of our full support and cooperation if required and hope that this application reaches a positive conclusion as a matter of urgency.</p> | | |
| <p>Harry Millson hacmillson@telkomsa.net</p> | <p>Attached herewith are my comments regarding the CES presentation of the proposed Coastal Protection Scheme at St Francis Bay. You have my contact details should you wish to revert back to me regarding the foregoing.</p> | Noted. | |
| | <p>PROPOSED COASTAL PROTECTION SCHEME, ST FRANCIS BAY, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE.</p> <p><u>COMMENTS ARISING FROM MEETING ON Tuesday, 27th August 2019.</u></p> <p>I submit herewith several comments and observations during and arising since the CES presentation of the “ENVIRONMENTAL SCOPING REPORT”.</p> <p>I am a property owner being a retired Civil Engineer and resident in St Francis Bay for 15 years, and as such have registered with CES as an Interested Party.</p> | Noted. | |
| | <p>1. Presentation.</p> <p>I consider the CES reports on the proposed project to be extremely professional and the Public meetings conducted in like manner. The reports are bulky as a result of the extensive coverage of the project and this makes it difficult for the public to read and digest. As a result the answers to several queries from the floor were to be found in the documents. Your presenters were very patient in handling such and all queries in the meetings to date.</p> | Noted. | Responded to and incorporated at scoping phase. |
| | <p>2. Project need and Desirability.</p> <p>In my opinion the Project need is understated in your report. St Francis Bay was founded on the support for the beach and adjacent Kromme River as an attractive destination for holiday makers, initially a fishing camp in the fifties. Over the years with the development of the Canals, upgrading of the Humansdorp access road including a bridge over the Kromme River, the construction of the Port, and recently the development of the St Francis Links Estate, has led to the present small vibrant town with a growing resident community.</p> | Noted. This will be amended in the EIR. | Responded to and incorporated at scoping phase. |

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| | <p>Sadly both the beach and the Kromme River have lost the initial attraction. As a result of erosion only a very narrow strip of beach is available at low tide, plus silt deposits has led to the river being barely navigable at low spring tide. Residents can no longer enjoy the walk to and return from the river mouth as there is no longer a continuous beach. Further, there is a very real possibility of the so-called spit along the northern section of the beach being breached which would result in massive damage to the Canals infrastructure and many up-market houses.</p> <p>There is now a real need to urgently address the foregoing, and this need has been recognised by the community for many years.</p> | | |
| | <p>3. Revetment structures.</p> <p>I must record that I am not in favour of rock revetments – specifically in the form of dumped rock faces.</p> <p>The existing revetments were constructed immediately above the high water level as a protection of properties fronting the eroding beach, and have proved a reasonable “quick-fix” protection. However, these structures of dumped rock were not founded on a reasonable base, are settling, and will need regular maintenance and possibly reconstructed every 5 to 10 years. Further, they are considered to be extremely dangerous as young children regard climbing up the face as a challenge and if trapped under a sliding boulder could have serious consequences. This brings a sense of urgency to the matter.</p> <p>The proposed permanent solution to face the existing structure with layers of “rock armour” and/or Geotextile Sand Containers - is a designed structure that will be partially covered with sand. However, it would appear that the crest will be protruding above the sand level and I consider this to be very unnatural – hopefully there will be sufficient sand to cover as much of these structures as possible. I note covering with sand could lead to lower maintenance costs in the future – it will certainly protect the GSC fabric from both vandalism and degradation due to exposure to UV light.</p> <p>Hopefully the growth of a suitable vegetation cover will also be encouraged.</p> | <p>Noted. The rock (if the revetment is constructed of rock) will be placed in accordance with Advisian’s design, and the work will be overseen by Advisian. The levels of the beach and revetment are shown on Advisian’s drawings.</p> <p>Covering the revetment with sand is an option which can be considered during the EIA.</p> | <p>Section 3.3.2 of the EIR provides a summary of the options considered for the revetment. Appendix F provides more engineering detail.</p> <p>The visual and ecological impacts of the scheme are presented in Section 7.2. Appropriate mitigation measures are also presented in Section 7.2 and the EMPr.</p> |

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| | <p>4. Stub groynes – not an environmental comment! Any rock structure built on sand into the sea will settle with time leading to maintenance and costs thereof being required to maintain the designed crest level.</p> <p>During the PEM intervention several lines of tubes were inserted into the sand at regular intervals for the full length of the beach. Is there any record of the depths inserted?? Specifically, is there any record of resistance to insertion of the tubes as a result of the presence of a rocky or similar layer that could provide a suitable base for the proposed groyne structure??</p> <p>Besides at the Kromme River mouth, I understand an under-water reef is also present approximately 200m east of the Aldabara road car park. If this can be confirmed, surely it would be an obvious site for a stub groyne?? Has any exploratory work been carried out in this regard??</p> | Noted. More detail will be provided during the EIA phase. | <p>The detailed design will ensure that the groynes will be constructed in such a way that their integrity and design parameters will be maintained. This includes limitation of the “settling” of rock material. While there may be a requirement to maintain the structures the groyne integrity is anticipated to last for the duration of the design life.</p> <p>In 2020 Advisian collected additional data to inform a second coastal modelling activity on the refined design. These reports are contained within Appendix F of the EIR.</p> |
| | <p>Finally, Once again, Congratulations on your presentation and we look forward to the speedy implementation of the proposed coastal protection scheme.</p> | Noted. | |
| <p>Peter Long plong@global.co.za</p> | <p>As a share holder of the Kromme River Mouth Share Block (pty) Ltd, may I record my support for this scheme. There are a total of 30 share holders in our block.</p> | Noted. | |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| <p>Daan Botha 041-03634668 daanbotha@harvest.co.za</p> | <p>In my capacity as chairperson of the Kromme River Mouth Share Block (PTY) Ltd, will you please register us as an Interested and Affected Party to the above proposals. You will note that one of the existing IAAP's is recorded as Mr Andre Jensen, but Mr Jensen sadly passed away at the beginning of 2017. He was our representative on this project.</p> | <p>Noted.</p> | <p>Responded to and incorporated at scoping phase.</p> |
| | <p>I represent the <u>Kromme River Mouth Shareblock (PTY) Ltd</u>, a duly registered Interested and Affected Party to the above mentioned Environmental Impact process. Please note my e-mail dated 18 June 2018 below as confirmation. I have read the Draft Scoping report and have two concerns that need to be noted.</p> | <p>Noted. The impact assessment has and will retain your concern as a potential impact. The impact being that, should the river channel be confined to the northern bank of the estuary, there is potential for scour and, should there be a flood, it could result in the mouth shifting to the north placing the northern bank at risk.</p> | |
| | <p>1. The report, for obvious and practical reasons, assumes that the current extent of the sand spit situated between the Eastern Canal of the St Francis Bay Marina and the ocean extends to the mouth of the Kromme River. This is not historically accurate as there is a particular marker where the original spit was legally allowed to extend to, which is a few 100 metres back along the sand spit towards the south. The gradual increase of the extent of the spit has been due to natural and human shoring up efforts, but is something that has caused us some concern over the years. In fact, we enclose some of the original letters from our previous chairperson, Mr Andre Jensen, confirming the concerns and the reasons for objections to the extending of the Sand spit to its current dimensions. Our objections are still valid and need to form part of our concerns which we are again formally lodging in this regard. Please see the attached original letters sent by our then attorneys, Rushmere, Noach and Partners and their correspondence with Mr Jensen.</p> | | <p>Section 7.2 of the EIR includes the impact for the potential scour along the northern bank of the estuary.</p> <p>The assessment was based on Advisian's updated coastal and estuarine model (Appendix F of the EIR). The estuarine model in particular ran a pre- and post-dredging scenario to understand the hydrodynamic change to the estuary. They conclude that very small current velocity changes will be experienced within the estuary. The most notable change will be at the mouth of the</p> |

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| | <p>2. With regard to the sourcing of sand from area A, the sandbank close to the Kromme River Mouth, this sand bank is directly opposite our property which is situated on the northern side of the mouth. You mention certain fish species and differing degrees of potential harm that could be caused by harvesting sand from this area, but whilst some worm species are mentioned, no mention is made of prawn species that I can find. This bank is well known for an abundance of sandprawn, bloodworm and pencil bait and we believe that it is vital to do a proper assessment of potential harm that could be caused by harvesting of sand from this area.</p> | <p>The EIR will provide more detail. The intention is to limit the removal of sand from the sand bank and use more from the channel. Some of the sand bank may be used and the EIR will provide an assessment on the significance of the loss of those bait species.</p> | <p>estuary where velocities increase immediately following the dredging. They normalise as the bathymetry “flattens” out.</p> <p>The revised sand sourcing approach is to utilise approx. 30% of the material available in the sand bank referred to (Refer to the Sand Sourcing Specialist Report in Appendix I of the EIR). Section 6.9.3 of the EIR describes the faunal species found in the Kromme Estuary (informed by the Estuarine and Dune Ecology Specialist Report – Appendix J of the EIR). Section 7.2 of the EIR discusses the impacts to these species as a result of the dredging as well as the potential impact to bait harvesting.</p> |

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| | <p>This serves to confirm that the KROMME RIVER MOUTH SHAREBLOCK PTY LTD is a duly registered Interested and Affected Party to the above process. As current Chair of the Board of Trustees, I attach a copy of our e-mail addressed to Nicole Wienand of CES on 11 April 2019 with attachments.</p> <p>Please note that whilst we are in principle in favour of the proposed dredging process for improvement of navigation of the Kromme Estuary, we still register the concerns as per our e-mail of 11 April as set out below and explained in the attachment hereto.</p> <p>We look forward to hearing from you in due course.</p> | Noted | <p>The impact assessment has been updated to include your concern as a potential impact. The impact being that, should the river channel be confined to the northern bank of the estuary, there is potential for scour and, should there be a flood, it could result in the mouth shifting to the north placing the northern bank at risk.</p> |

RUSHMERE NOACH & PARTNERS

Attorneys, Notaries, Conveyancers
& Administrators of Estates

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Our ref: Mr ALLCHURCH/sgr Your ref:

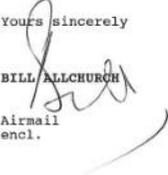
4th April 1989

Dear Andre

re: KROMME RIVER MOUTH SHARE BLOCK (PTY) LIMITED

Herewith a copy of a letter received from the Algoa Regional
Services Council, for your information.

Yours sincerely


BILL ALLCHURCH

Airmail
encl.

Leslie Lyn Arthur Williams, William Staton Allchurch B.A., Albert Pretorius B.Proc., Robin Owen Jefferson B.Com, B.Proc.,
Joseph William Truter, John Graham Richards B.A. LL.B., Leon Adriane Schoubert B.Juris, LL.B., Stephen Kenneth Gough B.A. LL.B.,
Assisted by Anthony James Bowes B.A. LL.B.
Consultants: Liddow Noach and Colin George Rushmere B.A. LL.B.

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ALGOA STREEKSDIENSTERAAD
REGIONAL SERVICES COUNCIL



RECEIVED: E 5 Mr Muller
YOUR REF: W S Allchurch/sm

1989-03-29

Messrs Rushmere Noach & Partners
P O Box 100
PORT ELIZABETH
6000

Dear Sirs

MR A M JENSEN : KROMME RIVER MOUTH SHARE BLOCK (PTY) LTD

Please note that the Divisional Council of Humansdorp was abolished on 31 December 1989 and has been incorporated into the Algoa Regional Services Council with effect from 1 January 1989.

Without prejudice to Council's rights in the relevant regard, receipt of your letter dated 7 November 1988, the contents of which are noted, is acknowledged herewith.

Yours faithfully

CHIEF EXECUTIVE OFFICER
JAM/arh

MAR 31 1989

RUSHMERE NOACH & PARTNERS

Attorneys, Notaries, Conveyancers
& Administrators of Estates

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Mr A M Jensen
131 Forest Road
Peppermint Grove
PERTH
6011
West Australia

Our ref: W S Allchurch/sm Your ref:

4th November 1988

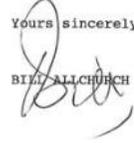
Dear Andre

re: KROMME RIVER MOUTH SHARE BLOCK (PTY) LIMITED

Enclosed herewith copy of letter forwarded to the Humansdorp
Divisional Council for your records.

I will communicate with you further in due course.

Yours sincerely


BILL ALLCHURCH

March 1989 - with Mr head - will send copy

Llewellyn Arthur Williams, William Stefan Allchurch B.A., Albert Pretorius B.Proc., Robin Owen Jefferson B.Com. II Proc.,
Joseph William Truter, John Graham Richards B.A. LL.B., Leon Adrian Schuur B.Juris. LL.B.,
Assisted by: Stephen Kenneth Gough B.A. LL.B. and Anthony James Rowe B.A. LL.B.,
Consultants: Dilders Noach and Colin George Rushmere B.A. LL.B.,

RUSHMERE NOACH & PARTNERS

Attorneys, Notaries, Conveyancers
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The Secretary
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P O Box 137
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Attention: Mr Basson

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Telephone: (041) 52-3450
Tele: 24-3061
Derece 6
Telefax: (041) 23517
Telegrams "Liemens"

Our ref: W S Allchurch/sm Your ref:

7th November 1988

Dear Sir

re: MR A M JENSEN : KROMME RIVER MOUTH SHARE BLOCK (PTY) LIMITED

We write to you on the instructions of our client Mr Andre Magnus Jensen the beneficial owner of a Share Block in Kromme River Mouth Share Block (Pty) Limited and as such the holder of the right of use and occupation of a site adjacent to the river bank in the vicinity of the Kromme River Mouth on the northern side of the river. Our client has instructed us to point out that the growth of sand dunes parallel to the sea stretching southwards from the Kromme River Mouth cover an area which was previously flat beach which was at all times covered by the spring high tides in the early 1950's. It is relevant to note that our client's father occupied the same property on a Lease basis with effect from 1950 until approximately 1967 and that our client occupied the property on the same basis from 1967 until 1976 when the Share Block system came into effect.

As a result of our client observing the damage caused by floods in Natal our client has become aware of the potential damming effect of the dunes in the event of a major deluge. This would cause the river to erode the dunes on which our client's house has been built especially when one recognises that approximately two-thirds of the potential flood plain has been dammed by the creation of the sand dunes parallel to the sea. The dunes will cause a build-up of water against the northern bank of the Kromme

2/...

Llewellyn Arthur Williams, William Staten Allchurch B.A., Albert Fredericus E.Proc., Robin Owen Jefferson B.Com, B.Proc.,
Joseph William Truter, John Graham Richards B.A. LL.B., Leon Adrian Schabart B.Jur. LL.B.,
Assisted by: Stephen Kenneth Gough B.A. LL.B. and Anthony James Brown B.A. LL.B.,
Consultants: Tudor Noach and Colin George Roshauer B.A. LL.B.

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| yvonne@fspa.co.za | We write in our capacity as Managing Agents for Goedgeloof Aandeleblok (Pty) Ltd and enclose herewith a letter confirming their support for the St Francis Bay Coastal Protection plan. | Noted. | |
| | We write in our capacity as Managing Agents for Goedgeloof Aandeleblok (Pty) Ltd. We hereby confirm that Goedgeloof Aandeleblok (Pty) Ltd is in full support of the St Francis Bay Coastal Protection Scheme as proposed in the Environmental Scoping Report DEDEAT; reference ECO 8/C/LN2//M42 – 2019. | Noted. | |
| Helen Crosby etonplace@btinternet.com | <p>I wish to submit the following comments on the SFB Estuarine and Dune System Impact Assessment report:</p> <ol style="list-style-type: none"> <li data-bbox="472 592 1491 1230">1. Given the inclusion of the Kromme estuary in the core set of SA estuarine systems, the use of the estuary as a source of sediment is at odds with the conservation status of the system and the estuary should not be considered as a source of sediment <li data-bbox="472 1230 1491 1394">2. There is no description of the proposed dredging works. The distinction between construction and operation is unhelpful; capital and maintenance dredging involve the same activities but on a different scale | <p>The Kromme Estuary is considered to be in a fair state of health (Whitfield, 2000) and in need of rehabilitation. According to Turpie and Clark (2007), the Kromme Estuary is listed as a high priority for rehabilitation, particularly water quality (silt), water quantity and the clearance of alien vegetation. Accordingly the removal of sediment is not anticipated to affect the ability of the estuary to function. This will be included in the EIR.</p> <p>The particular dredging methodology will be included in the EIR.</p> | <p>Refer to Estuarine and Dune Ecology Specialist Report in Appendix J where the potential impacts of the project are included.</p> <p>Section 2 of the EIR contains further information on the dredging and a distinction between</p> |

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| | | | capital and maintenance dredging. The detailed design and engagement with contractors will provide more information on the exact process, plant type etc. |
| | 3. The assessment (page 41) discusses 'existing impacts' but does not identify the activity that is cause thereof. There is no distinction between existing 'impacts' that constitute baseline conditions and the additional incremental impact due to dredging and pumping works - this needs to be clearly stated for the significance statement to have any meaning | This will be clarified in the EIR. | The existing impacts were included in the Estuarine and Dune Ecology Specialist Report (Appendix J). Specifically Section 8.1.1 describes the activities that have led to the impacts observed under the current conditions. |
| | 4. There is no consideration of potential impacts on avifauna that utilise the sandbank for resting and feeding | This will be included in the EIR. Sandbanks are used by dog walkers and the disturbance of dogs on resting, feeding and roosting water birds is well documented. | Updated in Section 6.9.3 of the EIR. |
| | 5. Monitoring is not a mitigation measure; monitoring serves to check that mitigation measures are implemented and are effective | Noted. | While monitoring is not a mitigation it is included because monitoring will inform |

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| | | | the adaptive management approach which is mitigation. |
| | 6. The impact on estuarine functional zone is a repeat of previously identified impacts and an additional impact - alteration of nutrient dynamics due to release of trapped nutrient from sediment - but this is not discussed as an impact to water quality (existing impact 3) | This will be clarified in the EIR. | While the change in nutrient loading was identified as a possible impact, previous studies have shown that there is constant flushing of the system with marine water. Therefore, if any nutrients are released it is anticipated that these would only exist temporarily due to the tidal cycle. |
| | 7. The 'improvement to recreational amenities' section is inconsistent. Dredging will increase the riverine area but it does not follow that increased activity in the riverine area is beneficial. The recreational carrying capacity of the Kromme is already exceeded during holiday periods due to the number of speedboats and jetskis licensed by the Municipality and this issue also needs to be addressed in the assessment | Investigations into the exceedance of the Kromme carrying capacity for recreational activity will be included in the EIR. | The Kromme Joint River Committee (KJRC) are custodians, on behalf of the Kouga Local Municipality (KLM) of the Kromme and Geelhout Rivers as vested by virtue of the MOA signed between the KLM and the KJRC NPC dated September, 2016. It is therefore the responsibility of the KJRC to manage |

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| | | | boat licencing and traffic. |
| | 8. If the sandbank is to be dredged, then the schedule must allow for no dredging works during breeding periods and the holiday season | This will be incorporated into the EIR based on proximity of dredging activity to known breeding locations and recreational areas. | Refer to Section 7.2 of the EIR. |
| | 9. The assessment of visual intrusion should be supported by visualisations of the dredging equipment and pipelines <i>in situ</i> | The EIR will contain a more detailed dredging methodology following which potential visual impacts can be assessed. | Section 7.2 of the EIR contains the visual assessment. |
| | 10. There is no information on ambient land noise levels, the dredging equipment noise levels and the estimated duration of the dredging works; this makes it difficult to assess the significance of noise impact to sensitive receptors | Noted. This will be included in the EIR. | While ambient noise levels were not recorded the anticipated noise levels from the machinery has been included in Section 2 of the EIR. The impact table in Section 7.2 of the EIR provide recommended mitigation actions to reduce the noise levels. These are replicated in the EMPr which is a document that becomes binding following a decision |

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| | <p>11. There is no consideration of the impact of underwater noise (from dredging) on fish populations within the river; given that fishing is one of the major attractions of the river</p> | <p>The EIR will contain a more detailed dredging methodology following which the potential underwater noise on fish species can be considered. At this stage it is anticipated that the underwater noise from dredging will be no more significant than the existing noise levels on the estuary.</p> | <p>from the competent authority.</p> <p>Underwater noise from dredging equipment, especially in shallow water is considered to be negligible. Especially considering the existing vessel activity on the estuary. There will be no percussion activity to influence hearing and / or behavioural changes.</p> |
| | <p>12. The lack of field surveys to support the assessment is a concern; especially regarding birds. Baseline information is insufficient to understand what the impact of the dredging works will be on existing biological communities within the estuary</p> | <p>The baseline environment has been determined based on research material available for the Kromme, which is considered to be a well-researched system. While avifaunal species rest and feed on the sandbanks, given the existing level of disturbance on the sandbanks in particular, a desktop analysis was deemed suitable. The EIR will provide more detail.</p> | <p>Updated in Section 6.9.3 of the EIR with the impacts reflected in Section 7.2 of the EIR.</p> |

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| | 13. The deposition of sediment on the beach is not habitat creation; that would be a collateral benefit of the beach nourishment if the beach variability stabilised sufficiently to allow establishment of benthic communities | Noted. | The primary objective is not habitat creation per se - there is no mention that the nourishment is intended as an offset. |
| | 14. There is no discussion of the risks to the long-term success of this proposal; and what the cost to the SFB economy would be if the scheme were to fail. | This will be included in an updated project need and desirability in the EIR. | The no-go alternative is covered in Section 3 of the EIR. |
| | 15. Given my comments, I disagree with the conclusion of the assessment that there are no fatal flaws | Noted. | |
| | 16. Additional issues: <ul style="list-style-type: none"> o Anecdotal evidence suggests that substantial sand has built up offshore of the northern end of the spit and the use of a cutter suction dredger based offshore depositing sediment onshore via a floating pipe must be investigated as a primary source of beach nourishment rather than the sandbank at the mouth of the river | The feasibility of offshore dredging has been investigated. Given the availability of dredgers in southern African waters and the depth of water, the offshore option is not feasible. This will be included in EIR. | Section 3.2.2 of the EIR comments on the feasibility of dredging the offshore environment as an alternative to the material coming from the Kromme Estuary. |
| | <ul style="list-style-type: none"> o The jetties in the ski canal should be removed to prevent access to the beach over the spit, given that people walk over the dunes, rather than use the broken walkways, destroying the dune vegetation and causing blow-outs | Noted. This should be unnecessary if the coastal protection infrastructure functions as expected. Nevertheless, it is something that can be done during normal dredging operations. | Responded to and incorporated at scoping phase. |

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| | <ul style="list-style-type: none"> o Stabilisation of the spit from the ski canal side should also be considered as a managed retreat strategy, in conjunction with beach nourishment and groyne construction | | This should be unnecessary if the coastal protection infrastructure functions as expected. |
| Mr Funanani Ditinti 021 819 2499 fditinti@environment.gov.za | Please see attached comments and recommendations as per your request. | Noted. | |
| | SUBJECT: Comments on the draft environmental scoping report for the proposed coastal protection scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape Province. The Department of Environment Affairs (DEA) in its Branch Oceans & Coasts (O&C) reviewed the Draft Environmental Scoping Report. Comments and recommendations are provided below: | | |
| | 1. The applicant must take note that the Branch Oceans and Coasts in DEA has the mandate to ensure that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable and to ensure the achievement of objectives of the ICM Act, 2008, and guarantee that the coastal environment will be protected and conserved throughout all phases of the proposed project. | | |
| | 2. Taking into account that the proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape Province with it associated activities will be taking place within the coastal zone, the competent authority is advised take into account the objective of the ICM Act, and further adhere and implement Section 63 of the ICM Act by taking into account all relevant factors, including how the proposed Coastal Protection Scheme will impact the marine environment and to ensure that proposed mitigation measures will safeguard the conservation and protection of the coastal zone. | | Updated in EIR. Specifically see Section 7.2 for detailed impacts. |
| 3. To ensure that the proposed Coastal Protection Scheme, St Francis Bay adheres to ICM Act objectives, the applicant must ensure that the construction footprint in the coastal zone is limited to the construction area. The Contractor shall restrict all activities, materials, equipment and personnel within the area specified or restrict activities to areas that are necessary to undertake the works. It is a recommendation of this Branch that disturbed areas rather than pristine or intact landscape areas should preferably be used for storage and temporary construction camps to avoid further disturbance. This Branch recommends that the EMP to be develop for the | Updated in the EMPr. | | |

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| | Proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape Province clearly identifies no go areas that need to be avoided, protected and conserved within the coast, the competent authority must ensure that these conditions forms part of the approval. | | |
| | 4. As part of technology alternative, the reports states that “the suitability (size, shape and material) of the revetment material will be verified and validated at an appropriate time during the design phase”. Taking that into consideration, DEA: O&C will provide comments when data is available during the next public participation process. | Noted. The EIR will contain more detail on the preferred design and materials. | Updated in EIR. The emergency works, carried out by the Kouga Municipality in 2020, will have an influence on the type of material used in the spit revetment during the detailed design. It is likely that similar material (rock) be used to ensure the structure is compatible with the existing material. |
| | 5. The applicant is advised to take into account the natural processes and climate change effects that take place within the proposed site (flooding, natural flow, erosion, sand accretion, strong winds and waves and storm surges). The structure plan and design should take such processes into consideration and ensures that sufficient mitigation measures are put in place to address them should they arise. The EAP is requested to provide information data (assessment and findings) on how wind will impact the proposed Coastal Protection Scheme, St Francis Bay and the surrounding areas within the site location and the surrounding areas of the proposed project during implementation and in the future. | Noted. The EIR will include a discussion regarding wind and its potential impacts on the design and surrounding areas. | Advisian’s Preliminary Design Report discusses the physical environment as parameters for design. These will be taken into account during the detailed design phase which is anticipated following the completion of the EIA process. |
| | 6. The EAP must provide information in relation to Sand sourcing alternatives to include an additional feasibility assessment (motivation with advantages and disadvantages) | Noted. This will be prepared for the EIR. | Advisian has, on Page 78 of their report in |

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| | <p>of sand sourcing from local areas (outside the identified alternative places) currently experiencing high sand accretion or that have enough sand needed to achieve the project.</p> | | <p>Appendix F, estimated the cost of sand pumping (read dredging) to be R58-85/m³. Escalated to current costs this amounts to approximately R65/m³.</p> <p>Trucking sand from Oyster Bay will cost in the order of 25 km @ R15/m³.km which equates to a transport cost alone of R375/m³. Trucking sand from Paradise Beach (Jeffrey's Bay) will cost in the order of 22 km @ R15/m³.km which equates to a transport cost alone of R330/m³.</p> |
| | <p>7. The EAP is advised to provide a detailed information on the type of technology alternatives (advantages and disadvantages) to be used to source the sand (dredge) from the estuary.</p> | <p>Noted. This will be prepared for the EIR.</p> | <p>Section 3.2.2 of the EIR discusses the technological alternatives.</p> |
| | <p>8. The sourcing (dredging) of sand from the Kromme estuary have potential of causing long term direct impact. The EAP must provide a detailed assessment report that stipulates the consequences of each proposed sand sourcing alternatives on the estuarine dynamic post construction impacts (impacts on sedimentation, water quality, saltation, depth and width of the estuary).</p> | <p>The specialist report titled "Estuarine and Dune Ecology" covered the potential impacts of the scheme on sedimentation, water</p> | <p>The Estuarine and Dune Ecology Specialist Report (Appendix J) contains the potential impacts for the proposed sand</p> |

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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| | | quality and the potential changes as a result of the change to the hydrodynamics. This will be included in the EIR. | sourcing locations. Through the study the alternatives were modified based on the findings of the various specialist studies. |
| | 9. From the information provided, O&C is of the view that more detailed information is needed (EAP to provide) on how the proposed protection structure (for all alternatives identified) will have cumulative impact (positive and negative) on the estuarine ecosystem and the coastal zone as a whole. | It is the intention that the alternatives will be revised to propose one preferred option. The preferred option will then be assessed for its potential impacts, including cumulative to the existing impacts. | This is included in Section 7 of the EIR. |
| | 10. The EAP is requested provide data that indicate the status of the beach (width and length) of the beach area that falls within the project scope. | Noted. Engineering studies will be appended to the EIR with the appropriate beach profiling data. | Updated in EIR. Specifically, Appendix F which contains the engineering reports. The engineering report documents the historical erosional environment, reports on the beach profiles and provides the subsequent preliminary design. |
| | 11. The proposed project will be implemented in a phased approach, should the first implemented phase (phase1) show a negative response (failing to address the erosion), is there any other resort that the applicant has considered, outside the scope of this current EIA application for the proposed Coastal Protection Scheme, St Francis Bay. | This will be addressed during the EIA phase. | Adjustments can be made to the groynes, such as the placement, spacing, length, angle, etc. Or off-shore breakwaters can be |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| | | | considered, or any of the options reported in previous engineering studies. |
| | 12. The beach nourishment, will it be done to elevate or regenerate the beach area? | The nourishment will be to regenerate the beach which will also result in beach elevation. This clarification will be included in the project description in the EIR. | Responded to and incorporated at scoping phase. |
| | 13. The impacts and suitability of sourcing of sand will be assessed by O&C once the Sand Material Sourcing Study is completed and distributed. | Noted. | Refer to Sand Sourcing Specialist Report (Appendix I) and specifically Section 6 which describes the potential impacts. |
| | 14. From the list of activities to be triggered by the proposed project, the report states that listing notice 2 Activity 23 will be triggered, "part of the sea will be reclaimed by the proposed development". The applicant must contact DEA: OC NTonjeni@environment.gov.za for the process to be followed when one intends to reclaim land in terms of Sec 7B ICM Act (Reclamation of land for state infrastructure). | Noted. | Responded to and incorporated at scoping phase. |
| | 15. O&C takes note that the applicant is the Kouga Municipality, therefore an ORV permit will not be required for the implementation of the proposed project. Should the competent authority decides to grand a positive environmental authorization, the applicant must notify DEA: OC NTonjeni@environment.gov.za before commencement of driving within the coastal zone. | Noted. | |
| | 16. It is a recommendation of this Branch that the applicant must not undertake activities that have not been assessed that requires authorization from the competent authority (either in support or not of the proposed project) to avoid causing adverse effects on the marine environment. Failure to adhere to the | Noted. | |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| | legalities may result in statutory enforcement measures being taken against the applicant. | | |
| | 17. Officials within DEA O&C responsible for EIA is Ms. Funanani Ditinti fditinti@environment.gov.za And Mr Xolani Myanga XMyanga@environment.gov.za. | Noted. | |
| | <p>The Branch Oceans and Coasts reviewed the Proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape Province, and recommends for the comments provided to be taken into consideration and implemented in order to achieve the objective of the ICM Act. DEA: O&C will provide more comments during the next Public participation phase.</p> <p>These comments must be sent to the competent authority for consideration and implementation, and send this office proof.</p> <p>Kindly note that the department reserves the right to revise our initial comments and we may request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office for the attention to the Funanani Ditinti/ Xolani Myanga Directorate: Coastal Conservation Strategies using the following contact details: Physical Address: Department of Environmental Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> | Noted. | |
| Mr Andries Struwig / Ms Nicole Gerber DEDEAT Nicole.Gerber@dedia.gov.za (Comments received from the Competent Authority) | The DSR does not contain any A3 maps or layouts. The FSR must include all maps, layouts and diagrams included at an appropriate scale, as A4 or smaller in most instances is not suitable; | Noted. The FSR will be submitted to the DEDEAT with A3 maps and layouts. | |
| | It is noted that modelling will be done at detailed design phase. The Department requires that this is made clear in the FSR and that an indication of whether a design can be ensured with respect to impacts on the northern beaches is taken cognisance of and discussed in the FSR and subsequently, the EIR; | The EIR will incorporate impacts to the coastal zone together with detailed mitigation measures to avoid any further coastal erosion being derived as a result of the proposed scheme. In addition, Advisian will be | In 2020 Advisian refined the preliminary design of the groynes and sediment nourishment. This required a revision to the coastal modelling which was extended to incorporate impacts |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| Comments Received During the Public Review Period for the Draft Scoping Report (20 August 2019 to 18 September 2019) | | | |
| | | required to report on the projected transport of sand northwards past the proposed coastal protection scheme as derived from their modelling, and an assessment will be made on the impacts of the scheme on beaches north of the scheme. | on beaches to the north. Section 6.7 of the EIR contains a summary of the changes to the coastal hydrodynamics as well as the changes to the long-shore transport of sediment and assesses the impacts in Section 7.2. A summary of the changes are included in the Specialist Reports (Appendix I & J) with the engineering reports in Appendix F containing the full detail. |
| | The adverse impacts of possible acceleration of erosion must be addressed, as well as mitigation measures and ongoing monitoring; | As above. | In 2020 Advisian refined the preliminary design of the groynes and sediment nourishment. This required a revision to the coastal modelling which was extended to incorporate impact on beaches to the north. Section 6.7 of the EIR contains a summary of the changes to the |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | coastal hydrodynamics as well as the changes to the long-shore transport of sediment and assesses the impacts in Section 7.2. A summary of the changes are included in the Specialist Reports (Appendix I & J) with the engineering reports in Appendix F containing the full detail. |
| | The Sand Sourcing Study must be included in the FSR if completed, but otherwise in the Draft EIR (DEIR) as a minimum requirement; | The Sand Sourcing Study will be made available for formal PPP during the EIR phase. | Refer to Appendix I in the EIR for the Sand Sourcing Specialist Report. |
| | Please note that some of the copies of responses received from I&AP's in Appendix B have not copied so well and are not legible and also quite small (notably pages 132 — 145) - kindly ensure that all copies of such responses are legible in the FSR; and | All comments and responses received from I&APs have been made legible in the FSR. | |
| | The Estuarine and Dune System Assessment should also include a section which addresses possible impacts of the proposed coastal protection scheme on areas northwards of the area proposed for the groynes, specifically addressing any potential accretion/erosion of the northern beaches/coastline. | Noted. The EAP suggests that the Coastal Ecology section of the EIR consider the effects of the coastal protection scheme on areas northwards of the area proposed for groynes rather than the Estuarine Specialist Report since these | In 2020 Advisian refined the preliminary design of the groynes and sediment nourishment. This required a revision to the coastal modelling which was extended to incorporate beaches to the north. The |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>d. It is noted that Appendix G includes an archaeological report dated 18 December 2006 from Geological and Environmental Services. In light of the sensitivity of the area, as well as the interest of local I & AP's, the Department requires that this report is updated and/or the findings confirmed by a suitable archaeological specialist during the EIA phase, as well as obtaining any comment from SAHRA or ECPHRA; and</p> <p>e. The Plan of Study includes the Source Material Study as well the Estuarine and Dune Impact Assessment.</p> <p>3. The FSR is hereby accepted and the Plan of Study is approved taking cognizance of the above. You are thus to proceed to the EIA phase as per the provision of Section 23 (A) of the NEMA:EIA Regulations as published in GN R982 of 14 December 2014, as amended. You are reminded that Final EIR is to be submitted within 106 days from the date of signature of this letter, i.e. by the end of business on Monday 02 March 2020. An environmental impact assessment report must contain all information set out in Appendix 3 to these Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazette by the Minister in a government notice.</p> <p>4. The Environmental Assessment Practitioner is require to notify and inform the application in writing that the activity may not commence prior to an environmental authorization being granted by the competent authority.</p> | | <p>The Archaeological and Heritage assessment was updated by a qualified expert. Comments were obtained from SAHRA and specifically the marine unit responsible for projects in the coastal zone (Refer to Appendix G of the EIR).</p> <p>Noted</p> <p>Noted</p> |
| <p>Mr Ryan Donnelly 076 011 3347 ryazion@gmail.com</p> | <p>I grew up surfing the beach since a teenager and I'm now 47. I have witnessed the beach changes since 1985. I have an intimate knowledge of the local beach conditions and what conditions makes those special waves work because I surfed these waves often since 1985 till now. I was also behind the Artificial Reef Company. I researched an alternative and presented this technology to the local committee and they then arranged to fly ASR out here and I spent a lot of time with the ASR guys on the beach project. I have a good understanding and background in the beach project and what it might take to preserve the local waves. When I saw that input</p> | <p>The Scoping Report (this is the initial step in the EIA process) underwent formal public participation from the 20th of August 2019 until the 18th of September 2019 and has now been submitted to the</p> | <p>In 2020 Advisian refined the preliminary design of the groynes. This resulted in the relocation of a number of groynes and importantly their orientation in relation to the shoreline (Refer to the engineering reports in Appendix F). The relocation of the groynes is to avoid well-known surf breaks while the orientation of the</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>from the local surfers is wanted I became encouraged to make contact with the engineers. I also noticed one of the potential groyne layouts and felt that if in fact the surfers had given input that it does look like there is an oversight if the intention is to preserve the wave at Ann Avenue. In any event I have invested a lot in the passed in this project and feel that it would be a wrong of me to not offer my input to the benefit of this projects objectives which is to my knowledge is to solve the beach erosion issue and hopefully also preserve the waves for the surfing community and industry.</p> <p>I am not represented by his surfing community representative.</p> <p>I am also not a member of the surfing community or organisation from Cape St Francis so at this point it appears the best way for me to participate is to submit a formal comment to you for the St Francis Property Owners NPC Proposed Coastal Protection scheme.</p> <p>Here is my comment:</p> <p>There appears to be a number of groyne options many of which will have an impact on our surfing environment. In some ways potentially positive and in others ways potentially negative. In order to participate in a meaningful way and make an informed comment for this project I would need a final plan to look at. My understanding is that the plan can be changed by the engineers after the approval of the EIA process. This makes it impossible to participate meningfully and make an informed comment for this project and upcoming EIA process. How these structures will affect the waves for the surfers will depend on where the groynes are placed. Waves are a part of the environment and they are tied to our surfing industry, surf culture, pleasure, recreation and sense of place in st Francis bay . The final locations of the groynes are needed and the engineers should be held accountable to their final plan. If the engineers change their plan and location of the groynes after the approval of the EIA we will need the approval of the EIA to be null and void and the EIA reopened for further</p> | <p>Competent Authority, the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT). The DEDEAT will determine if the EIA process may continue, after which the Draft Environmental Impact Assessment report (EIR) will be compiled and made available for public review. CES is aiming to have the Draft EIR ready in early November and therefore the next public review process, which may include a public meeting, will likely take place in mid- to late-November 2019. Because your comment has been submitted outside of the formal process, it must be sent directly to the DEDEAT who will then include it in their project file. I have thus forwarded your comment to the DEDEAT for consideration.</p> | <p>groynes (i.e. perpendicular to the shoreline) is to facilitate the potential development of new breaks.</p> <p>This was as a result of the engagement with The Seal Point Boardriders Club and surfers outside of this club.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>public comment process before final approval of this EIA. This is if we wish to make an informed comment for this project and EIA process.</p> <p>The latest groyne map and locations shows a groyne at Ann avenue which has a significant impact on a much valued world class surfing wave called Ann Avenue.</p> | <p>In addition, you will be added to the list of Interested and/or Affected Parties (I&APs) for the project and will thus be informed as the EIA process progresses.</p> | |
| <p>Mr Rod Suter 042 294 1627/082 880 7344 rod.suter@gmail.com</p> | <p>Please could you sent me a legible copy of the attached presentation slide which forms part of the Scoping Report.</p> | <p>Apologies for the delayed response. Please find attached the slide requested. Please note that this is the slide that was presented at the time of the public meeting and is subject to change depending on the outcome of the Final Scoping report submitted to the DEDEAT.</p> | <p>Noted</p> |
| | <p>Please could you assist and point me in the right direction to get a copy of one of the reference documents :</p> <p>ASR. (2006). ST FRANCIS BAY BEACH PROJECT: Investigations into the Application of MultiPurpose Reefs at St Francis Beach for Coastal Protection and Amenity Enhancement. SR Ltd Marine Consulting and Reseach.</p> | <p>Please find attached the reference document as requested.</p> | <p>Noted</p> |
| <p>Xolani Myanga Department of Environment, Forestry and Fisheries: Oceans and Coasts +27 (0)21 819 2424 XMyanga@environment.gov.za</p> | <p>The estuary is already experiencing issues of erosion as well as sedimentation. The Applicant should ensure that dredging does not worsen the current situation in and around the estuary.</p> | | <p>In 2020 Advisian used bathymetry data collected in 2020 to run a model that simulated the hydrodynamics of the estuary before and after dredging. These reports are available in Appendix F. The effect of the change reported in the engineering report was considered in the Sand Sourcing Specialist Study (Appendix I) and the Estuarine and Dune Ecology Specialist Report</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | (Appendix J). A summary of the changes and the resultant impacts are contained in Sections 6.7, 6.9.1 and Section 7.2 of the EIR. |
| | We are of the view that dredging will possible widen and deepen the channel and this may have negative impacts on the biota. The Applicant is requested to provide an assessment report and findings on how dredging will have impacts on the biota both in the channel and along the estuary margins. | | Refer to the Sand Sourcing (Appendix I) and Estuarine and Dune Ecology (Appendix J) specialist studies. |
| | The Kromme estuary is already under stress due to reduced flow. Therefore, we are concerned that dredging will possibly increase the amount of seawater entering the estuary resulting in a further reduction in saltmarshes which require a balance between salt and freshwater. Will an appropriate balance be maintained? | | Refer to the Estuarine and Dune Ecology Specialist Study (Appendix J). |
| | Furthermore, the EAP is requested to clarify whether the introduction of considerable extra sand in the area of the threatened sandpit, together with revetments and groynes is appropriate to provide sustainable protection of the St Francis marina area for a reasonable time into the future from a physical oceanography and coastal vulnerability perspective. | | The design life of the structures is 50 years. Refer to Section 2.4 of Advisian's PED Report (Appendix F). A design event with a return period of 100 years has been selected for design. This event has a probability of occurrence of approximately 40% during the structure design life. |
| | According to the Final Scoping Report there are other sites in the estuary that are similar to the ones that will be affected and that the fish can go to those areas? Has any thought been given or investigated as to why the fish prefer their current sites? | | The FSR does not mention that the sandbanks are the current preferred sites, it merely suggests that fish in the area will have access to similar habitats in other parts of the estuary (Refer to the Estuarine and Dune Ecology Specialist Report in Appendix J of the EIR for further information). |
| | The Final Scoping Report also states that benthic invertebrates will recolonize the area at some point in time. The EAP is requested to elaborate on what will happen to the fish that feed on them during the intervening period. | | The FSR states that some benthic species would be lost from specific and discreet areas. It is anticipated that this impact will have low significance given the small percentage of the overall |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>The EAP is requested to elaborate on whether any modelling or specialist study have been conducted of coastal circulation in the areas regarding the long term effects of the proposed revetment? For example, from studies of the rock revetment at the strand along the southern section at Greenways Golf Estate, the findings actually show the rock revetment actually deflects energy northwards directly to the main beach which increased the wave energy and impacts of the waves on the coast, particularly during storm event.</p> | | <p>available habitat (See Section 7.2 of the EIR). Therefore, the effect on fish is expected to be of negligible (Refer to Appendix J).</p> <p>The intention with the groynes is to retain the sand material placed on the beach. The nourished beach will provide the necessary protection. Therefore, if the beach behaves as anticipated the beach will not refract / deflect the waves but absorb them as it would have done under natural conditions (Refer to the preliminary design report by Advisian in Appendix F of the EIR).</p> <p>The existing scenario, where the revetments along St Francis Bay are exposed, has the deflection effect. This would be the same in a future scenario should all the nourished material on the beach disappear. Given the planned maintenance of the beaches this is extremely unlikely.</p> |
| | <p>The wave power atlas by Rautenbach and Williams show that for all seasons and regarding the total annual average wave power, the beach falls into the “extremely sheltered” category. This means that wave power output at the 7m isobaths is less than 10kW/m i.e. very low. This was then checked for each season with the same result. Information published as GIS shapefiles and can be downloaded: Wave power atlas: https://search.datacite.org/works/10.15493/deff.10000003; Wave power exposure: https://search.datacite.org/works/10.15493/deff.10000004. This low wave energy leads to the question the Final Scoping Reports view about wave energy being the culprit: What was considered to draw this conclusion?</p> | | <p>It is the EAPs understanding is that the longshore drift, created by waves, has transported sediment to the north. This together with the lack of replenishment of sediment has led to the current state. This is exacerbated through storm events and local circulation. For a more detailed understanding of the hydrodynamics please refer to the Preliminary Design Report in Appendix F of the EIR.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <ul style="list-style-type: none"> Was it perhaps rather a few extreme storm surges that removed the sand thereby reducing beach width? Alternatively, is there some localized circulation in the bay that could be removing sand? | | |
| | <p>Furthermore, the wave power findings above, the 7m isobaths is roughly 1km from the coast. Unless there is some type of shelf which we are not picking up. It is our assumption that the slope is gradual which would further support the low wave power output.</p> | | <p>It is the EAPs understanding is that the longshore drift, created by waves, has transported sediment to the north. This together with the lack of replenishment of sediment has led to the current state. In 2020 Advisian repeated their coastal model with the refined project layout. This report summarises the offshore/coastal conditions experienced. Please refer to these reports in Appendix F of the EIR.</p> |
| | <p>The EAP is advised that even though the Branch OC has no objection to the proposed development of the coastal protection scheme, it continues to advocate for the implementation of the comments previously submitted to the Applicant.</p> | | <p>Noted.</p> |

Table 4 Comments Received During the Public Review Period for the Draft Environmental Impact Report (5 February 2020)

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| <p>Rod C Suter rod.suter@gmail.com</p> | <p>Thank you, noted that we now have a second PPP meeting, with slightly more notice.</p> <p>However, the period of 1 week after the meeting until the closing of the Comment period seems insufficient.</p> | | <p>Thanks for your time last week it was good to get a bit more context behind your original comments and your current concerns.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>I suggest it should be extended to at least 3-4 weeks - seeing that this post-meeting period was planned to be about 7 weeks after the first PPP meeting on 19 Dec.</p> | | <p>CES are confident that, with two meetings for the Draft EIR and the fact that we have significantly extended the mandatory PPP period, Interested and Affected Parties have all had sufficient time to review the documentation and to provide comment.</p> <p>The EAP will record your comment below in the Issues and Response Trail which will form part of the Final EIR so that the Department are aware of your request.</p> <p>Let me know if you have any additional comments.</p> |
| | <p>Thanks for the additional meeting last night - I think the number of attendees shows it was necessary, and some the inputs from the floor were of value. Unfortunately, it was apparent that a large number of the attendees had not bothered to properly read and understand the report - and in spite of the total number number of pages, the core info is probably no more than 100 pages at most.</p> <p>A suggestion in light of the discussions - it would seem to be invaluable from an information dissemination and public support perspective to set up (very soon) a PPP-type public meeting with the Advisian Engineering report as the topic, obviously with Advisian attending to explain/defend their engineering report and design. I don't know how this would fit into the formal EIA framework, if at all, but I think it is very necessary; and I believe SFPO would probably support this suggestion as well.</p> <p>I would also again support Ryan's proposal that the PPP period is extended beyond 5 Feb.</p> | | <p>Email received – thank you.</p> <p>Your comments will be recorded and responded to as part of the Issues and Response Trail in the subsequent round of documentation.</p> <p>That documentation will be made available in due course with notifications sent out.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | <p>Very disappointed that you have apparently decided not to accede to the request for a public meeting including Advisian - I think this is a mistake which could lead to delays and appeals later in the process, which is hardly desirable.</p> <p>PROPOSED COASTAL PROTECTION SCHEME ST FRANCIS BAY, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE DEDEAT REFERENCE NUMBER: EC08/C/LN2/M/42-2019 Comments by RC Suter</p> <p>My earlier Comments in the EIA Process, as recorded in the IRT, are referenced.</p> <p>I submit that the Mandatory Public Review process for the Draft EIR and Environmental Management Programme is flawed and has not been performed as required in terms of the relevant norms, legislation and regulations.</p> <p>The motivation for this opinion is:</p> <p>1. Notification was issued of the Mandatory Public Review process on 18 December 2019, principally by e-mail. This notification advised that (1) the PPP period for comments and inputs would close on the 5 Feb 2020, and (2) that there would be one public meeting held on 19 Dec 2019 – i.e. giving 1day notice.</p> <p>This PPP period covered the annual year-end holiday period in South Africa; this is the time of the year when many St Francis Bay residents are away from home and thus unable to attend the meeting – The reasoning behind this timing has not been forthcoming.</p> <p>After objections and interactions between interested parties and the EAP, a further meeting was grudgingly arranged by CES on the 29 Jan 2020 (i.e. well after the end of the holiday period). The fact that the first meeting was attended by some 20 people, and the second meeting by more than 80 people, indicates the level of interest from local community.</p> | | <p>Noted. It is the intention that time for engineering related questions will be scheduled for the next round of PPP. Advisian will be present to respond accordingly.</p> <p>Dear Mr Govender. Thank you for your email of 6 February. I have provided our response below based on Mr Suter’s points. Item 1 - being related to PPP and the time allowed to I&APs to provide comment. Item 2 – related to an understanding of the scheme from an engineering point of view.</p> <p>1. PPP</p> <p>CES requested that the department (DEDEAT) consider that the PPP period for the Draft EIR be extended to cover the holiday period as many of the owners of the properties are not permanent residents. The primary purpose of extending the review period to 6 weeks and to hold it over the Christmas period as this is the time that many non-resident St Francis Bay homeowners are in the town for the holiday period. Confirmation was received from DEDEAT on the 9th December 2019.</p> <p>Notifications of PPP commencement (as mandated by the legislation) and public meeting on the 19th December:</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | <ul style="list-style-type: none"> • Were placed around St Francis Bay (St Francis Bay Spar, Municipal Offices, Small Boat Harbour (outside and inside the office building), SFPO offices, St Francis Community Library, Bruces Ocean Museum and Sea Vista Community Library) on the 17th December 2019 along with notification during the SFPO AGM on the 17th December (204 Attendees); • Sent out via email (18th December 2019) to all registered I&AP's; • Sent out via email from the SFPO newsletter desk to all members on their data base on 18th December 2019; and • Published in the press (Herald 18th December, Kouga Express 19th December), as prescribed in the legislation; <p>Hard copies of the report were made available in the Municipal Offices and SFPO offices on the 19th December 2019 and electronically from the CES website on the 19th December 2019.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | <p>The presentation on the 19th December 2019 summarised the information contained in the documentation. It covered the Project Description, Alternatives, Need for EIA, Baseline Environment (incl. Specialist Reports), IA methodology, Potential impacts of the scheme, Recommendations for mitigation and monitoring (EMP), Questions and information on where to send comments. The main difference between the EIR and Scoping Presentations were the inclusion of the specialist studies and the environmental impact ratings. The engineering design was the same as that presented in the Pre-Application meeting (Public Meeting held on 15th April 2019) and the Draft Scoping Report (Public Meeting held in August 2019). Thus, IAPs have had the period from (29th March 2019) to 5 February 2020, a period of ten months, to read and understand the technical aspects of the proposed scheme.</p> <p>The documentation referred to above included:</p> <ul style="list-style-type: none"> • The Draft EIR (including Draft EMPr); |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | <ul style="list-style-type: none"> • The preliminary engineering design report (released on 29th March 2019 during the Pre-Application PPP); • The Estuarine Specialist Report (available from 20th August 2019 as part of the documentation from the Draft Scoping phase); • The Sand Sourcing Specialist Report (available from the 19th December 2019 as part of the Draft EIR); and • The Archaeological Specialist Report (available from the 19th December 2019 as part of the Draft EIR). <p>CES together with the SFPO considered the request for a second meeting outside of the holiday period to include local residents who may have been away. This, as confirmed by Mr Suter below, was well outside the holiday period to accommodate local residents. Thus, we have held meetings to include residents, holiday makers and non-resident homeowners.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| | | | <p>Notifications of a 2nd meeting on the 29th January 2020:</p> <ul style="list-style-type: none"> • Were placed around St Francis Bay (St Francis Bay Spar, Municipal Offices, Small Boat Harbour (outside and inside the office building), SFPO offices, St Francis Community Library, Bruces Ocean Museum and Sea Vista Community Library); • Were sent out via email (16th January 2020) to all registered I&AP's; and • Published in the press (Herald 17th January) and local posters (including St Francis Bay Facebook pages). <p>The presentation was very similar to that presented on the 19th December 2019.</p> <p>According to the register, the meeting on the 19th December was attended to by 22 people. Previous meeting registers indicate that there were:</p> <ul style="list-style-type: none"> • 30 people present during the initial public meeting held in December 2018; • 25 people present during the Pre-Application meeting held on the 15th April 2019; |

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| | | | <ul style="list-style-type: none"> • 19 people during the Draft Scoping PPP (August 2019); and • 66 people in attendance on the 29th January 2020. <p>CES consider that there has been significant opportunity for interested and affected parties to be involved in the project and to provide comment:</p> <ul style="list-style-type: none"> • Non mandatory 30 day comment period for Pre-Application Phase (April) including 1 public meeting; • Mandatory 30 day comment period for Scoping Phase including 1 public meeting; • Mandatory 30 day comment period for the Draft EIR extended by 18 days to accommodate holiday makers, including 2 public meetings; and • As the department are aware, comments have been submitted outside of the formal commenting periods which we have accommodated in the IRT. |
| | <p>2. At the meeting on 29 Jan 2020, there were many questions from the floor concerning the fundamental concepts and details of the Engineering Design Report – authored by Advisian. Mr G Shaw from the EAP, CES, stated he was not an engineer, and was thus unable to respond to these questions. He undertook to forward them to Advisian, but how the responses were to be circulated was unclear.</p> | | <p>Engineering design</p> <p>The engineering design report was first presented during a meeting held in December 2018. The document has been available since 29th March 2019 in all EIA related activity as well as permanently on the SFPO website.</p> |

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| | <p>As Advisian engineering concepts and designs are key to the definition, execution and success of the proposed scheme, this serious deficiency in the PPP process is unacceptable and could lead to delays and appeals at later stages in the EIA.</p> <p>The EAP was approached with the suggestion to extend the closing date of the Mandatory Public Review process, and to then arrange a further public meeting on the engineering aspects of the scheme with Advisian in attendance. These approaches were rejected by the EAP.</p> <p>Accordingly, the Competent Authority (DEDEAT) is requested to intervene and instruct that the proposed public meeting with Advisian is put in hand by the EAP and included in the PPP prior to DEDEAT undertaking their review of the EIR for this scheme.</p> | | <p>During the initial meetings there was more time spent on the problem at St Francis Bay and why an intervention is required, together with the proposed approach to solving the problem (including alternatives). Questions were answered based on the information contained within the report. Questions that couldn't be answered were provided to the engineers and included in the issues and response trail (IRT) as part of the EIA process.</p> <p>During the meeting for the Draft EIR in 2020 the scheme and design was still included but emphasis was placed on the resultant impacts associated with the scheme, and what mitigation was recommended to ensure the impacts remained as low as reasonably possible. At the start of the meeting the EAP mentioned that it would be impossible to cover every element of the project in the time allowed (2 hours) and therefore did require that the documentation be read to gain further detail.</p> |

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| | | | <p>In the notification sent out to the I&APs for the meeting on the 29th January 2020 CES recommended that I&APs read the documentation and come to the meeting with specific comments. During the meeting it was clear that many had not read the documentation (confirmed by Mr Suter himself in an email dated 30th January which will be included in the IRT). Nineteen attendees raised questions and/or made comments. CES was able to answer most of these questions. Questions of an environmental and EIA process were answered and engineering related questions raised that could answer (based on the engineering report) were answered. For those where CES could not be sure (either of the answer or whether it appeared in the report) the CES facilitator (Mr Gregory Shaw) mentioned that he wasn't an engineer.</p> |

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| | | | <p>Nineteen attendees spoke at the meeting. Questions of a strict engineering design nature came from four attendees, and the questions which CES could not answer were whether permeable groynes were considered, whether enhancing existing off-shore reefs has been considered and a question regarding the founding of the groynes. CES believe that these questions can be easily answered by Advisian, without arranging a meeting for them to do so.</p> <p>Direct engagement with the proponent, outside of the formal EIA process, on the engineering design has been available to IAPs should they have been interested. This has taken place, for example with the Seal Point Boardriders Club.</p> <p>CES are confident that the impacts associated with this scheme can be determined based on the information available in the engineering reports available, and where necessary the confidence in which the impacts can be determined.</p> <p>It is CES' opinion, based on our extensive engagement with IAPs, that only a small number of individuals share Mr Suter's view which, in some</p> |

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| | | | cases, have not been informed by the documentation (engineering and EIA reports) and presentations to date. |
| <p>Les Noah. LFN1@vodamail.co.za</p> | <p>We attended the meeting for the EIA for the proposed construction of the groynes to the Saint Francis Bay beaches, on 29 January 2020. There were some points and questions which were put to you, and you were unable to answer at the meeting, as you stated each time "I am not an engineer". These questions are important questions, and remain unanswered. We need a further meeting, and we request that an engineer be present, who can answer the questions and the concerns put forward by the public participants, and give us the answers, and be able to explain it to us, as we too are not engineers. Please can you also furnish us with any other EIA on groynes that your company has been involved with along our coastline. As a result of this last EIA meeting, it has brought up more questions than answers. We need a fully comprehensive understanding of the proposal before any informed decisions can be made. For this reason, we request an extension of the deadline for the EIA, for a further 60 days, for us to do more research, and to understand that the EIA covers all the questions that are extremely important before submission to the next relevant authorities. A further request is that the minutes of the previous two meetings be available.</p> | | <p>Comments received – thank you. More information on our previous work can be found on our website http://www.cesnet.co.za/company-profile Please note that your comments will be recorded and responded to as part of the Issues and Response Trail in the subsequent round of documentation. That documentation (which will include meeting minutes, presentation, etc.) will be made available in due course with notifications sent out.</p> |
| <p>Ryan Donnelly ryazion@gmail.com</p> | <p>Here with is my comment for the St Francis beach EIA process.</p> <p>1. With regard to the feasible Alternatives. Gregory Shaw said that enhancing existing offshore reefs has not been considered or investigated.</p> | | <p>In 2014 WorleyParsons reviewed previous studies and investigations and they assessed potential remedial options. They have, inter alia, also reviewed the ASR report.</p> |

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| | <p>2. The draft makes mention that the surfers input has been sent to AVISAN for the next design phase. I am a local surfer of 27 years and was involved in the Save the Beach committee. I researched and presented the ASR technology to the Save the Beach committee, attended the meetings and lived with the ASR costal engineers during their visit. My input comes with a meaningful and educated background in the save St Francis beach project and it has not been considered, captured or sent to AVISAN.</p> <p>Dion of SFPO said to me that the surfers input is invited AFTER DEDEAT approval of the project.</p> | | <ul style="list-style-type: none"> • Problems were experienced with three reefs developed by ASR, namely the Taranaki Reef and the Mount Maunganui Reef in New Zealand as well as the Boscombe Reef in the United Kingdom. • ASR went into liquidation in 2012. • Deon Pienaar of SFPO NPC did not say to the I&AP that the surfers' inputs will be invited after DEDEAT approval. He said to the I&AP that the detail design will be carried out after DEDEAT approval. <p>SFPO NPC had meetings with members of the surfing community on various occasions during 2019 and 2020, and information received from the surfers was passed on to Advisian. This I&AP was asked whether he would like to submit his surfing comments together with the other surfers, but he said that he would rather submit his comments separately. Surfer inputs were consolidated during a meeting held with surfers on the beach on 9 January 2020 and the outcome of this meeting was also passed on to Advisian. In 2020 Advisian refined the layout of the preliminary design to accommodate the surfing community's concerns. The coastal modelling to accompany the design change are detailed in Appendix F of the EIR.</p> |

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| | <p>3. Roberto a CESNET EIA consultant said to me over the phone that the project is not ready for the public EIA process and that the draft wording allows for far too much leeway for change after DEDEAT approval.</p> | | <ul style="list-style-type: none"> • The CES colleague who was involved in this project mentioned that his decision to leave CES was not linked to this project. Similarly, he would not have offered his own personal opinion on the project since his role as an EAP is to provide an objective representation of the facts. • The current EAP's aim is to provide a balanced and objective summary of the project and the impacts associated with it. |
| | <p>4. ASR costal engineers reminded me that the groyne structures will not work in st francis bay. Dion of SFPO said that he thinks the groyne's will work. With the permanent financial consequences to our small village involving an independent costal engineer is likely a responsible thing to do.</p> | | <p>Please refer to the first comment regarding peer review from Rodney Suter:</p> <ul style="list-style-type: none"> • Neither the SFPO NPC, nor Advisian are opposed to a peer review. This is normally undertaken during the detail design stage. During the preliminary design stage the concept of a groyne field and beach nourishment was developed. During the detail design stage the scheme will be developed in greater detail (e.g. exact placement of groynes, groyne lengths and angles, stone size, mass and shape, etc.), and at this stage a peer review may add more value. |

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| | | | <ul style="list-style-type: none"> Publicly available information reported on problems experienced with three reefs developed by ASR, namely the Taranaki Reef and the Mount Maunganui Reef in New Zealand as well as the Boscombe Reef in the United Kingdom. ASR went into liquidation in 2012. |
| | 5. There was mention by Wayne Furphy of the SFPO about above groyne developments at the second last public meeting and that they are looking for investors for this. Information in the draft about the intended above groyne developments is non-existent. | | This application does not include for any development on top of the groynes. What is being submitted for approval is presented in Section 2 of the EIR |
| | 6. Where are the minutes of the last two meetings? | | Please see Appendix B of the EIR |
| | 7. The drafts predicted beach profile is NOT consistent with a groyne structure. This is misleading to the public. The predicted beach profiles in the draft are consistent with submerged groyne's, permeable groyne's and offshore reefs. | | A salient shoreline response would be expected for an offshore breakwater as presented in Section 5.3 of the Preliminary Design Report in Appendix F. Sediment build-up updrift of the groynes are expected due to longshore sediment transport. The groynes are short and will allow some sediment to by-pass the groynes, reducing erosion on the downdrift side of the groynes (i.e. jagged beach response). The updated engineering reports in Appendix F show the indicative design profile of the beach nourishment. It is recognised that the hydrodynamic conditions will naturally rework the sediment which may alter the profile between maintenance activities. |

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| | <p>8. With regard to beach nourishment. Where in the Draft can we find plans of the pump stations their positions and outlets? How have the impacts on the roads been looked at for sand nourishment and project build?</p> | | <p>It is anticipated that no permanent structures (i.e. pumps, pipelines) will be constructed. Given that sediment has to be transported from various locations all pumps and pipelines will need to be mobile and in temporary locations. The EIR provides an indication in Section 9 regarding areas to avoid during the construction phase of the project. Contractors will need to avoid placement of equipment in these areas due to the sensitivities identified (environmental and social).</p> |
| | <p>9. Gregg Shaw said at the last meeting that there has been no study or survey to establish where the bedrock is in the bay. This survey has the potential to change the design, cost and location of the groyne structures in a significant way. This survey should be done before close of public participation.</p> | | <p>The presence or absence of bedrock does not influence the design. Refer to Appendix F for the engineering reports and further detail.</p> |
| | <p>10. In light of there currently being only 2 days left of public participation for this IEA, with so many grey areas, un answered questions, with many SFPO mentioned updates and changes to the draft still in store, the recent new above groyne development information pertaining to this project and a lack of crucial information, I hereby formally request an extension to the public EIA process. That there be key stakeholder focus group meetings with all relevant persons including the engineers, all with the agenda to look at the grey areas, deficiencies in information, to help avoid oversights, improve the integrity of the project and work together toward solutions where needed. To update the draft so the public can be in a position to make an informed comment for this EIA process.</p> | | <p>See Section 8 of the EIR which details the extent of public engagement for this project. The opportunity for public comment on the Draft EIR was between 19th December 2019 and 5th February 2020 and included 2 public meetings.</p> |
| <p>Helene Loon 084 8114327 helene_loon@yahoo.com</p> | <p><u>Comments on the St Francis Bay Coastal Protection Scheme Draft EIR</u></p> | | <p>The aim of the EIR is to assess the impact of the project on the receiving environment. The Kromme Estuary is well-researched and relevant information has been included to contextualise the impact. Generally</p> |

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| | <p>I would like to submit comments on the Draft EIA document as an I&AP who has grown up close to the Kromme River estuary, and witnessed how the ecological and physical nature of this fragile river system has been altered significantly in the past few decades, as a direct result of human interference. These impacts include the construction of two dams in the catchment area, a canal system significantly impacting the functioning of the sensitive river mouth, a bridge crossing the river and effecting sand movements, to coastal housing developments covering once mobile dunes that used to be an integral part of the natural sand movements replenishing the St Francis Bay beach. I am writing as someone who would prefer not to see even further degradation to a system already on the edge.</p> <p>The Kromme River estuary is regarded as one of the most important estuarine systems in South Africa. The Draft EIA document covers in detail the incredibly valuable ecological role that the salt marshes, reed beds, as well as the intertidal sand and mudflats play as integral components of the estuarine environment. It recognises the vital role that estuaries play as nurseries and feeding grounds for numerous fish species, and that a wide diversity of invertebrates species inhabit the estuarine substrate. Local bird species as well as numerous Palearctic migrants rely on the rich pickings on the mudflats and sandbanks.</p> <p>The document also realistically acknowledges that even with mitigation processes in place, it is just not possible to carry out the proposed coastal protection scheme without some loss or damage to the integrity of the estuarine system during the dredging process, and gives a detailed and thorough analysis of the potential impacts to the system – both negative and positive. While it is very reassuring to know that the EIA document reflects a comprehensive understanding of the potential impacts at stake, there are a few questions that I would like to put forward for clarification.</p> | | <p>ichthyofaunal will move away from areas of disturbance. The activity of dredging (and nourishment) is relatively slow and will allow mobile species to move out of the area.</p> <p>The areas targeted for sand nourishment are those areas associated with the river channel and sand banks. While sandbanks offer habitat to benthic organisms it isn't necessarily considered sensitive habitat for ichthyofaunal. Those sensitive areas (i.e. nursery areas) are likely to be associated with eelgrass beds and smaller channels away from disturbance. These areas have been mapped and included in the EIR (see Section 6.9).</p> <p>Less mobile species are unlikely to be able to avoid the dredging activity and the loss of individuals is expected. However, the sandbanks in the Kromme Estuary are extensive and the species present are numerous and common within the estuary and along the South African coastline. Therefore, the impact is unlikely to result in significant impacts to species on a wide scale. Dredging activity can be fairly accurately undertaken and therefore there is limited possibilities of collateral damage or loss. Suspended sediment from the dredging operation is anticipated but again the impact is</p> |

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| | <p>It was encouraging to read that should the development proceed, a regular monitoring programme would be put in place to track the ecological well-being of the ecosystem over time, as well as the fact that regular beach profiles would be taken at St Francis beach and in the river, that sediment discharge quantities and changes to hydrodynamics would be monitored - and that this would be done pre-dredging, during dredging and post dredging.</p> <p>Based on this, my questions would be :</p> <p>1) Is there sufficient ecological baseline data from which to measure subsequent changes and compare results over time? For example, in the EIR it states that 'There is a significant lack of recent literature concerning the ichthyofaunal composition of the Kromme Estuary'. This leads me to question whether enough research has been done on fish recruitment in the estuary prior to dredging, to know whether the impacts of dredging are affecting the nursery areas used by young fish, and to gauge their survival rates? And do we know enough about seasonal variations in fish numbers? How will we know whether suspended sediment from dredging is smothering macrobenthic communities and negatively affecting their biology, e.g. the filter feeders? And how will disruption to the estuarine substrate and sandbanks effect creatures such as bloodworms, pencil bait, sandprawns and numerous other crustaceans? How will the change in hydrodynamics effect the system as a whole? One can speculate based on knowledge of the ecosystem, but is it enough to justify the risk involved? Severe negative impacts on even one species could have repercussions for so many others.</p> | | <p>expected to be very localised to the area immediately around the dredger. Estuaries by their nature are dynamic systems and organisms that exist within them have strategies to deal with smothering or periods of higher suspended sediments. On very windy days the turbidity of the Kromme can be very high.</p> <p>Hydrodynamics are likely to change. These changes have been modelled (Refer to Appendix F of the EIR) and for the most part a negligible change is predicted. The largest difference in current velocity is expected at the mouth of the estuary and only occurs immediately following dredging in that area. The ecological impacts associated with the changes have been described in the Sand Sourcing Specialist Report (Appendix I) and the Estuarine and Dune Ecology Specialist Report (Appendix J). Section 7.2 of the EIR summarises the impacts.</p> |

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| | <p>2) Most importantly, if significantly negative impacts to the environment ARE detected during the ongoing monitoring process in either the beach or estuarine environments - despite the numerous mitigation measure put in place – will the beach nourishment activities of the St Francis Bay coastal protection scheme be halted, and who would be in a position to make this vital decision ? I would like to be assured that measures are FIRMLY in place to stop further developments should the coastal environment be significantly compromised, before irreplaceable loss of sensitive habitats and biodiversity takes place. I feel that this is urgent given that the operation phase of the development is predicted to continue into perpetuity.</p> | | <p>The EMPr accompanying the EIR is a document against which the project will be monitored. Monitoring reports would need to be submitted to the authorities. These reports would need to report on, amongst other parameters, whether the impacts assessed as part of the EIR are still true. DEDEAT would review the documentation and are able to revoke their authorisation should it be necessary.</p> <p>A benefit of the design and approach is that the project can be phased. This would allow for appraisal of the environment as the project develops. Equally it allows for the project to be halted/adjusted should any significant adverse impacts be identified that were not anticipated.</p> <p>The natural longshore drift will continue and therefore if the scheme is not continued for any reason the sand placed on the beach will continue to move to the north as it currently does. Some of the sand will find its way back into the estuary while some will continue northwards. While expensive and complex, groyne structures can be removed if necessary.</p> |

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| | <p>3) Would experts be able to advise on what time-span is needed before such a cut-off decision is put in place? I feel that it is vital to be able to recognise the point at which further degradation would be irreversible, and halt activities in order to prevent long-term damage.</p> <p>While I really do respect the economic importance of promoting and sustaining tourism in the area, I am just so aware that dredging activities and the artificial manipulation of estuarine mouths are known to have potentially disastrous impacts on estuaries. It would be wonderful to be able to avoid further impacts on this valuable and beautiful area.</p> <p>Thank you very much for the efforts that you are putting into this important consultation process.</p> | | <p>A benefit of the design and approach is that the project can be phased. This would allow for appraisal of the environment as the project develops. Equally it allows for the project to be halted/adjusted should any significant adverse impacts be identified that were not anticipated.</p> |
| | <p>I am not sure whether you are aware of the critically endangered gecko species, the Salt Marsh Gecko (<i>Cryptactites peringueyi</i>) that inhabits the Kromme River salt marshes. It is endemic to the Eastern Cape, and according to The Atlas and Red List of the Reptiles of South Africa, Lesotho and Swaziland, it is known from only 2 small populations. The first is near Cape Recife, while the second population is restricted to the salt marshes of the Kromme River estuary and in habitats adjacent to the coast at Cape St Francis. We have been fortunate to see it on a number of occasions on the Kromme salt marshes, and are hoping that the habitat of this critically endangered species will not be compromised.</p> | | <p>The salt marsh has been identified as a sensitive habitat. The mitigation measures included in Section 7.2 emphasize that dredging avoid salt marsh areas. The dredging has also been designed to retain sand bank features in areas fronting salt marsh to ensure they remain intact. In addition, the result of the modelling of the effect of dredging on the estuary shows that the change to the current velocities are negligible. This suggests that the system would behave in a similar manner to what it does currently.</p> |
| <p>Dr David Comyn 0832618037 djcomyn@gmail.com</p> | <p>IN OPPOSITION TO THE PROPOSED PLAN TO REPLENISH THE BEACH AT ST FRANCIS BAY</p> <p>Whereas replenishment and nourishment of the beach is the priority, the current proposed plan is impractical and unacceptable for the following reasons. This paper follows two meetings to discuss its environmental impact on the Kromme River and the beach.</p> | | <p>Noted.</p> |

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| | <p>1. The entire project was conceived by a narrow group whose stated purpose is to “preserve the value of their properties”, not the greater good of the community. This is evidenced by the plan to make the “spit” the first priority in preference to the main beach. The reasons given for this environmental priority were poor and evasive. By far the greater good to the community would be to rectify the beach. Indeed the environmental plan acknowledges that the northward continental sand drift will favourably impact on the “spit” in time anyway. There is a widely held view that as soon as the “spit” is protected at the completion of phase one, the driving force behind this project will dissipate. If the “spit is breached the canal entrances can be protected by maintenance dredging as happens right now, at a fraction of the cost. Thousands of visitors have voiced their disappointment at the condition of the beach and this poses the real danger to the town as a popular resort.</p> | | <p>Revetments have been installed along the most vulnerable portions along the St Francis Beach, except for the Spit area. The Spit area has suffered more aggressive erosion than the rest of the St Francis Beach (refer to the Advisian report – Appendix F). In 2020 the spit breached on four occasions leading to the implementation of emergency rock revetment by the Kouga Municipality.</p> <p>The major part of the project entails coastal protection, comprising groynes and beach nourishment, for the entire length of the St Francis Beach.</p> |
| | <p>2. The plan is flawed.</p> <p>A. It is incomplete. At both the recent meetings the main gist of many of the questions, which reflect the uncertainty of the community, concerned the engineering plan. It has not been fully explained. To answer “I am not an engineer” is just not good enough. Understanding the engineering plan is key to understanding the environmental impact. The rate and levy paying residents deserve more detail. To impose a regulatory time frame for evaluating an incomplete plan is not the best way to encourage the wider community to accept it.</p> | | <p>During the initial meetings associated with the EIA process there was more time spent on the problem at St Francis Bay and why an intervention is required, together with the proposed approach to solving the problem (including alternatives). During the later meetings the focus shifted to the potential impacts associated with the scheme since the meeting was aimed to only provide a summary of the documentation available. Questions were answered based on the information contained within the report. Questions that couldn’t be answered were provided to the engineers and included in the issues and response trail (IRT) as part of the EIA process.</p> |

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| | <p>B. It has not been fully costed and there is no definite plan as to where the money will be sourced. This is pertinent to permanent residents who will bear the burden for many years.</p> | | <p>A cost estimate for the coastal protection infrastructure has been prepared by Advisian. Refer to Section 6.6 of their preliminary design report. Also refer to Section 5.8 of Advisian’s report on the spit revetment for their cost estimate for the three revetment options.</p> <p>Additional reports were produced in 2020 to serve as an update based on the refined design. Appendix F of the EIR contains the reports and updated cost estimates for the works proposed.</p> <p>Funding for the project are obtained from the SRA levy, other entities such as the St Francis Riparian Home Owners Association and the Kromme Joint River Committee, possible public funding and further private funding opportunities.</p> |

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| | <p>As a member of the community with property between the bridge and the Sand River delta I view the current dredging plan to be flawed from both an environmental and loss of amenity perspective. The environmental plan is confusing because sections of this area are variably described as sensitive and non-sensitive at the same time. To accept the environmental plan I need to understand this. The proposed dredging of the north bank to create a new channel will seriously impact on the salt marsh as boat wake action will erode the bank. This is an important habitat for Kromme River estuarine flora and fauna. The greatest damage to this area was done when the Sand River disgorged thousands of cubes of sand into the river. Old photographs will show that the original channel hugged the south bank. The most favorable sand removal by dredging or road will be to re-establish the original river course. Geophysical examination will confirm the river course. The river frontage of these properties is a playground for young children and adults alike. Long standing sporting traditions will be impacted. The biggest value of dredging will be to open the original channel by making it wider and deeper thereby making it safer and easier to navigate.</p> | | <p>The EIR summarises the ecological sensitivities of the estuary in Section 6.9. This is informed by the Estuarine and Dune Ecology Specialist Report (Appendix J of the EIR). The EIR goes on to identify the potential impacts associated with the scheme in Section 7.2. In Section 7.2 it is recognised that some sensitive vegetation will be impacted by the scheme and goes on to quantify the loss (in terms of area) and provides the impact significance. There is also the provision of mitigation measures to ensure that the impact is to a discreet section of the habitat. Section 7.2 also includes the impact to the amenity of the estuary.</p> <p>Section 9.6 presents the sensitivities and dredging locations and provides recommendations for no-go areas. Therefore, some areas deemed sensitive may fall outside of the no-go area delineated in Section 9.7.</p> |
| | <p>Conclusion. I propose the least damage for the most good, environmentally, financially and in the interests of the wider community (visitors and permanent residents) will be to concentrate all available energy and finances to restore the beach by fully planning and costing revetment protection and sand replenishment and nourishment. I also propose a rethink of the dredging plan immediately below the bridge.</p> | | <p>Noted. Appendix F of the EIR provide a detailed description of the previous solutions presented for the frontage and presents the proposed layout and orientation of the groynes and beach nourishment. The Sand Sourcing Specialist Report (Appendix I of the EIR) presents the most suitable sand resource and the Estuarine and Dune Ecology Specialist Report (Appendix J) presents the potential impacts.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FSR) | EAP RESPONSE (FEIR) |
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| <p>Anthony P Smith +27 42 294 0660 Apsmith@westnet.com.au</p> | <p>I have read the St F Bay Draft Scoping Report with Appendixes and attended the above mentioned meeting. The report, in my opinion, has some anomalies that when raised at the meeting you were not able to explain or clarify. The main problem being with what was being stated in the EIA section and what remedy/options were being proposed in the Engineering reports. This has raised more questions than answers. This makes it very difficult to make an informed decision based on the report and I therefore request that deadline for the application be extended for a further period of between 30 and 60 days. This will allow for an additional meeting to be held which can then include the people responsible for the Engineering report, to be present and able to answer the questions that were presented by the public at the last meeting. As a last request would it be possible for you to send me the presentation slides that you presented, as these summarised the contents of the report extremely well.</p> | | <p>The presentation is included in the Final EIR (Appendix B).</p> <p>Specific engineering questions were tabled with the engineers and responded to as part of the Issues and Response Trail (Appendix B). Significant details are contained in the engineering reports in Appendix F of the EIR and summarised in the EIR.</p> |
| <p>Frank Silberbauer infinity@iafrica.com</p> | <p>Please refer to Table 5 below for comments specifically from this I&AP representing the Kromme Properties Share Block</p> | | |
| <p>Mr Andries Struwig / Ms Nicole Gerber DEDEAT Nicole.Gerber@dedea.gov.za (Comments received from the Competent Authority)</p> | <p>1. The Draft Environmental Impact Report (DEIR), which is inclusive of the Draft Estuarine and Dune System Impact Assessment Report, as well as the Draft Beach Nourishment Source Material Study, and a separately bound Environmental Management Programme (EMPr) dated 06 January 2020 and received on 07 January 2020 for the above project refers. 2. Refer also to the acceptance of the FSR letter dated 25 October 2019.</p> <p>The Department has reviewed the DEIR and hereby provides the following comments:</p> <p>a. The DEIR does not contain any A3 maps or layouts. The FEIR must include all maps, layouts and diagrams included at an appropriate scale, at least in A3;</p> | | <p>Noted</p> <p>Noted</p> <p>These will be included in the FEIR.</p> |

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| | <p>b. It is noted that the concerns raised during the PPP at Draft Scoping Phase have been addressed and these are captured in the I&AP Issues and Responses Trail. However, there is no register of I&APs, no copies of I&AP correspondence and public meeting minutes, as well as no copies of the Department’s letters in relation to the project, and particularly the letter accepting the FSR and POSEIA included in Appendix B. Such must be included in order to fulfil the requirements of the Department;</p> <p>c. The EMPr is lacking in terms of operational management. The Department requires that a maintenance management plan for the required actions envisaged in the operational phase is drafted and included in the EMPr to be included in the FEIR;</p> <p>d. The adverse impact of possible acceleration of erosion, particularly regarding the northern banks of the Kromme River mouth and the northern beaches has not been satisfactorily addressed – the impact assessment, Section 7, Table 7.2 only briefly address this by indicating that the banks must remain intact. The method of doing so as well as mitigation measures and ongoing monitoring must be specifically addressed. The few bulleted points contained in the EMPr also do not give sufficient information besides monitoring being enacted; and</p> | | <p>These will be included in the FEIR. Refer to Appendix B.</p> <p>The EAP agrees that a maintenance management plan is required. This is recommended as a condition of the Environmental Authorisation. A maintenance management plan requires specific details of the dredging plant, dredging areas, approach and timing. This therefore, can only be developed following engagement with a contractor and based on conditions in the estuary and beach prior to construction.</p> <p>Advisian undertook additional modelling during 2020, using updated bathymetry and topographical surveys, and they produced two reports:</p> |

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| | <p>e. The Estuarine and Dune System Assessment, dated August 2019, has not, as per the comments in the acceptance of the FSR dated 25 October 2019, addressed possible impacts of the proposed coastal protection scheme on the areas northwards of the area proposed for the groynes, specifically addressing any potential accretion./erosion of the northern beaches/coastline.</p> | | <ul style="list-style-type: none"> • A report on their hydrodynamic modelling study of the estuary. Their findings were that the currents outside the main channel (i.e. near to the banks, and in particular on the northern bank close to the river mouth are low (up to 0.2 m/s) and the dredging does not lead to any significant change in the currents in this area. |

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| | | | <ul style="list-style-type: none"> • A report on their supplementary shoreline modelling. The findings of that report were that the proposed groyne scheme in combination with beach maintenance will provide a continuous supply of approximately 28,000 m³ per year that will be transported to the northern coastline when the complete solution is implemented, and that it is considered to be more beneficial to the northern coastline than allowing the St Francis Beach to erode to the extent where negligible sediment transport can occur which would result in the northern beaches experiencing accelerated erosion. |

Table 5 Comments Received During the Public Review Period for the Environmental Impact Report (5 February 2020) from Mr F. Silberbauer

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 27 | 5 | Is the horizontal dry beach width of 40m to be measured at low or high tide? We presume this measurement is to be estimated at high tide? | Beach | Nourishment size | This is measured from high tide |
| 31 | 15 | Excuse the comment, but the procedure described for the filling of GSC containers sounds just too simple and easy, but in reality it is another whole issue with its own set of impacts? | | The procedure of filling GSC containers is complex and its impact with regard to equipment and function should be discussed. Environmental variables must be taken into account. | It is a fairly simple process, comprising placing the geotextile container in the required location, fit the dredger's delivery pipe to the dedicated filling mechanism in accordance with the geotextile container supplier's instructions, fill the container with dredge slurry, the water drains through the permeable geotextile, the sand remains and the structure is in place. |
| 31 | 16 | In most instances at present and in the future plant & machinery cannot be stored on the beach due to the current absence of the beach at different times of the year. It would be appropriate to note that machinery could be stored at the nearest carpark but again logistical issues arise during peak season being December and Easter. Impacts and their mitigation need to be noted | Beach | Beach access and logistics as a result of beach conditions relating to beach size and access. | <p>The contractor will be responsible to ensure they have adequate access to the construction areas and storage of equipment. Plant will not be stored on the beach.</p> <p>Possible available areas that could be used for storage of equipment will be identified for the contractor such as open areas on disturbed land. It may, or may not, be a car park.</p> <p>It should be noted that the project will most probably be phased. To try and identify these areas for any particular phase is at the moment premature. This will be done at tender stage for each phase.</p> |

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| 107 | 72 | A feel good statement not really based on any fact? | Beach | Statement regarding the improvement of the current surf break which is not backed up with any supporting information. Provide details please? | In 2020 Advisian refined the design, considering the comments made by the surfing community with regards to the location of the groynes and their orientation. Refer to Appendix F of the EIR. |
| 110 | 76 | Misleading - should read: The projected project aims to slow down the rate of beach erosion, and assist in the possible prevention of damage to backshore infrastructure. | Beach | Just commenting on the statement that this project will 'prevent erosion' which could be construed as misleading? | The sentence in the EIR mentions to protect the St Francis Bay beach from further erosion. The placement of additional sediment along the frontage would become a beach which in turn would be maintained. |
| 124 | 98 | The bathymetric study should be done prior to the presentation of this EIA, as was the case in the previous study in 2006. | Beach | These studies will allow for more confidence in the viability of what has been presented in this study? | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments.</p> <p>The findings have been considered in the specialist reports and the EIR. Detail of the modelling can be found in Appendix F of the EIR with the associated specialist reports in Appendix I & J.</p> |
| 32 | 18 | The use of mechanical equipment will require input from the engineers and the timing of such works vs the core activities carried out by both permanent and temporary residents of St Francis Bay. These impacts and mitigatory steps so that the estuary is open for permanent residents are to be noted? | Dredging Equipment | - No description or proposal relating to the type of equipment and its impact upon the residents of the Kromme Estuary. Details are necessary? | Section 2.5.1.2 of the EIR presents the information known. At this stage no contractor has been appointed and therefore estimates have been provided based on experience and published information. |

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| 107 | 73 | As there is absolutely no information as to what the physical characteristics of the dredger or dredgers will be, and secondly we have no idea as to the infrastructure associated with these machines (pipes, cables, anchors, moorings). Again a further point, excavators come in many shapes and sizes we dont know what is in stall so we cannot really comment on this impact? | Dredging Equipment | - This query was put at a public meeting and we were referred to the Joint River Committee who's representative could not enlighten us on this subject? At this stage this question seems to not have been thought through. | Section 2.5.1.2 of the EIR presents the information known. At this stage no contractor has been appointed and therefore estimates have been provided based on experience and published information. |
| 109 | 74 | As already noted if one has some idea as to the type of noise expected then comments relevant to the noise problem can be made. At this stage we have not a clue as to what we are commenting upon? | Dredging Equipment | - Ditto as above comment | Section 2.5.1.2 of the EIR presents the information known. At this stage no contractor has been appointed and therefore estimates have been provided based on experience and published information. |
| 643 | 135 | NOISE DISTURBANCE: It must be noted that Kromme Properties Shareblock has permanent and semi-permanent residents and as this area is to supply 50% of the dredging material the noise and disturbance factor will be onerous. The canal users are screened from the river and therefore dont have 'in your face' machinery for possibly 50% of the dredging time on the Kromme. It gets even worse as one notes that the delta area is to be removed and again due to the nature of these sediments/deposits excavators and TLB machinery will be active during day time hours. Mitigatory steps in this instance are not feasible. | Dredging Equipment | - In the past the presence of Chokka boats adjacent to Kromme Properties was a continuous both day and night. Pollution was a factor and breakins were experienced. One understands that conditions can be applied to the dredging, but by its very nature and the nature of the works issues such as programming, weather, breakdowns etc. all make a regulated environment difficult to maintain. Kromme properties has experienced this before and really are not happy go down this road again. | To clarify, the Kromme Properties Shareblock represents 9 properties on the southern bank of the Kromme River, immediately downstream of the R330 road bridge. The dredging area in front of the Shareblock will supply less than 15% of the sediment required for the project. |

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| 47 | 25 | <p>The desire to dredge the Kromme Estuary is noted, however the desirability of a deeper estuary, the greater movement of water (stronger tides), facilitating larger boats and easier access at all times can and will be of benefit to those who only use the estuary for recreational purposes - however the impacts of such have not been viewed from the point of view of landowners on the estuary and those not confined within the canal system, such as bank erosion, scouring, removal of recreational sandbanks, the depletion of estuarine fauna and flora, and general amenity loss.</p> | Dredging - Impact | <p>Viewpoint of those who are resident on the estuary such as Kromme River Properties who's property has 610 meters of estuary frontage. Impacts such as sea level rise, increased mobility of boats on the estuary over tide changes, damage to existing shoreline, increased threat of accident due to increased access, the continued safety of swimming of children, possible increase in large power boats, pollution and general amenity degradation are all potential impacts which are possibly irrelevant to those who visit St Francis annually, but are real issues to Kromme Properties which is inhabited on a semi-permanent basis.</p> | <p>As mentioned in Section 7.2 and in response to these questions that have been raised previously. It is recognized that activity (motor boat, paddle boat, swimming) levels are likely to increase. The impacts have been included and there is recognition that management of the activities requires consideration. This is particularly relevant to motor boats. Currently the Kromme River Joint Committee (KRJC) been mandated to ensure that this activity is managed appropriately and safely. This remains their mandate and the EIR re-enforces it. This includes no wake zones, demarcated channels, adequate signage and speed limits.</p> <p>To clarify, the KRJC represents 185 property owners who have been supportive of this initiative. Refer to Norman Dyer's response in the IRT.</p> <p>The EAP has taken an objective approach in their consideration of the affected persons and does not favour any particular group.</p> |

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| 103 | 52 | The impact of the removal of sediment from the river is claimed as 'can be effectively mitigated/reversed without much difficulty or cost.' - IMPOSSIBLE | Dredging - Impact | No comment on this one? | This is in relation to hydrodynamics where it is possible to mitigate the effect of the change in hydrodynamics to those areas identified as being sensitive. In this case there is reference to the northern bank of the estuary and the estuary mouth. The results of the 2020 Advisian modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). |
| 557 | 105 | Statement - Regular bathymetric surveys of the lower Estuary area should be undertaken pre-dredging - This aspect should have been done prior to this scoping report. | Dredging - Impact | ditto as per previous comments on this issue. | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments.</p> <p>The findings have been considered in the specialist reports and the EIR. Detail of the modelling can be found in Appendix F of the EIR with the associated specialist reports in Appendix I & J.</p> |

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| 560 | 109 | It is noted that the REVERSIBILITY of the IMPACTS of dredging is listed as 'DIFFICULT' TO 'VERY DIFFICULT'. This is of great concern and should set off alarm bells on the long term viability of dredging large quantities of material. Is it probable that if the proposed works were modeled with up to date data, could the outcomes as presented here change? One understands that this EIA has been done on a low budget, but the data is just not convincing and the possible damage to the whole | Dredging - Impact | | While the reversibility and mitigation column is an important consideration, the reader should note that this has been taken into consideration in the impact significance. |
| 561 | 110 | Cumulative Impact Dredging to Kromme Properties Shareblock (Pty) Ltd which extends along the south bank of Priority area 2 will have a severe long term high impact that could lead to the possible reconfiguration of the channel (both downstream and upstream of the bridge), This may in turn lead to significant erosion/scouring of the banks of the estuary which may pose risks to infrastructure (i.e.. the bridge, and riverside properties) - there is no mitigation measures offered for this area. | Dredging - Impact | Potential accelerated erosion and scouring of the banks of the estuary | In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). Section 7.2 has been updated accordingly. |
| 588 | 120 | STATEMENT - The species that will be directly lost (benthic organisms) as a result of the dredging activity are not sensitive species and while their abundance may be reduced initially it is expected that these species will return and inhabit newly dredged areas - In 2011 large areas benthic organisms were lost when they were covered by up to 1,5m of sand, debris and bridge rubble covering an area of 54,000m2. It is presumed that all benthic fauna in this area was lost as a result of this flood event. Today this area is vegetated with salt marsh and pioneer species. | Dredging - Impact | Loss of areas of benthic fauna in 2011 and now potentially due to dredging? | The loss of individuals of various benthic species will be as a result of the mechanical removal of the substrate. While there may be localised smothering of benthic species it is unlikely that there would be smothering impacts outside the work area. |

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| 637 | 129 | MPACT ON ESTUARINE VEGETATION Reed & Sedge communities - No loss. Intertidal Areas - Loss 16% Zostera capensis - Loss 10% Are these figures a result of a field study or desktop analysis? | Dredging - Impact | How were these figures calculated? | Figures were calculated on the mapping carried out as part of the Estuarine and Dune Ecology Specialist Report (Appendix J). |
| 639 | 131 | It looks as if no matter what one does dredging will reduce the faunal communities as there is no way that any contractor will implement systems to prevent such damage as that level of application just does not exist in this financially restricted proposal. | Dredging - Impact | impact on faunal communities. | The impact to the faunal communities referred to here is through direct loss due to the mechanical dredging operation. There is very little mitigation for separating/extracting fauna from the material prior to dredging. |
| 640 | 132 | STATEMENT: Overall, there will be a 10% reduction in Zostera habitat, a 16% reduction in intertidal areas, and a 33% reduction of sandbank habitat A further reduction of habitat, and whether mitigation happens or over the next 20 years habitat will be lost. There is no guarantee that these habitats will recover? | Dredging - Impact | impact upon flora communities | The reduction in habitat is based on a precautionary approach assuming that all areas disturbed directly through the dredging activity will initially be lost. The EIR maintains a MODERATE adverse impact as the nature of dredging and disturbance of the substrate cannot be mitigated fully. |
| 642 | 134 | STATEMENT: dredging is likely to reduce the level of the sandbank which may result in it becoming a subtidal feature Loss of areas of recreation at low tides. | Dredging - Impact | Those who live and enjoy the Kromme will have a reduced area to participate in low tide activities such as fishing, walking, games, sunbathing etc. which are all common at low tide. The Kromme Shareblock Community will lose this feature as all sandbanks adjacent to these properties will be lowered. | The sandbanks that fall within the priority and secondary dredging areas will be reduced by 2 m and 1 m respectively. The area designated for dredging in front of the Kromme Shareblock Community is mostly aligned with the current channel which is currently the deepest part of the estuary in this area and unlikely to be dry at low water. |

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| 643 | 136 | DEEPER CHANNELS DUE TO DREDGING: Yes it will be beneficial to boat owners and those who come down for peak periods but those who live on the estuary will have a continuous movement of traffic up and down the channel which is not the case at present as the low tide restricts the larger boats from traversing low areas of the estuary. It also gives fishermen the chance to fish without continuous disturbance from speed boats. | Dredging - Impact | comment on a proposed beneficial impact for dredging? | <p>The benefit of dredging the channel will allow for passage of vessels through more states of the tide and specifically low water. It is also seen as a benefit to other users as the vessels will stick to the marked and dredged channel rather than seeking alternative routes. The KRJC are mandated to manage vessel numbers and behavior on the estuary. This is understood to already take place.</p> <p>The amenity and recreation opportunities are considered beneficial since the estuary is freely accessible by all members of the public.</p> |
| 644 | 137 | The proposed mitigation steps are good but their enforcement even without dredgers etc. will be limited as their implementation will push the costs for dredging to unacceptable levels. | Dredging - Impact | comment on cost of recommended mitigatory steps added to dredging costs? | These measures are proposed to ensure safety to both contractor and general public. Safety should be considered as essential and factored into the budget regardless of the cost. Most contractors would implement these mitigation measures as part of their operations. |

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| 644 | 138 | BANK EROSION - The 9 properties of Kromme Properties Shareblock will be most affected as a result of bank erosion and jetty damage. | Dredging - Impact | comment on increased bank erosion. | <p>The EIR recognizes that the vegetation along the banks of the Kromme bind the sediment and provide resilience to the banks from erosion. This has resulted in the targeting of the main channel and adjacent sandbanks as the source for the beach nourishment material. Very few locations along the length of the estuary propose dredging directly of the estuarine banks. In those areas it is proposed due to the volume of suitable sand material available with little to no vegetation.</p> |
| | | | | | <p>An increase in vessels has been identified as an impact, specifically the potential for erosion of the banks via the effect of wake. The KJRC have the authority to declare no wake zones and are aware of the potential issues related to the use of the estuary by motorized vessels, The KJRC are I&APs in this project and are aware of the potential impacts associated with the increase in vessel movements. It is also recommended that the The Kromme Properties Shareblock raise their concerns with the KJRC regarding the impacts to jetties. Should wake be kept to a minimum the impacts to the jetties is unlikely to be significant.</p> |

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| 645 | 139 | For the residents of the Kromme Properties Shareblock (Pty) Ltd the estuarine impacts will be increased due to the close proximity of the properties to the estuary. This proximity is magnified as the property is occupied on a semi permanent basis. In the past this property endured the presence of several large chokka boats moored in the river, and experienced continued house break-ins, damage to property, and continued human waste, diesel, and slop pollution. In addition area under the Kromme Bridge became a loading zone for the catch and diesel bowzers. Despite assurances from the Algoa Regional Services Council, the Chokka boat owners, and Local Council nothing was done to alleviate the impact of this industry upon the river and Shareblock. So moving into the future please indicate as to whether the mitigation measures mentioned in this study will be honored? The writer can from personal experience state that the answer will be NO! | Dredging - Impact | | The mitigation measures are enforced through the adoption of the Environmental Management Programme as a requirement of the Environmental Authorisation. Part of the recommended monitoring and election of an Environmental Control Officers would be to report to DEDEAT on the compliance of the contractor/proponent with those measures included in the EIR. The risk to the contractor/proponent would be revoke of the EA should the authority deem necessary. |
| | | | | | It is also likely that local conservation and interest groups would be monitoring the activities either formally or informally and raise any concerns at the earliest opportunity. |
| 653 | 141 | STATEMENT: it is expected that these species will return and inhabit newly dredged areas. Will the same fauna occupy areas that are up too 1 meter deeper, dont bloodworm need a low tide and other bait species need a low tide? If yes then the loss of 175,000m2 area for bait species is expected? | Dredging - Impact | The proposed works are reducing the available areas for species return to the area. It should be required that each species that inhabits areas to be dredged be studied and their ability to re colonise these areas be made known. It is important to know this information as dredging is a destructive process to all that inhabit the dredged material. We need more information on this vital point? | Many of the benthic species are found on both intertidal and subtidal sand bank habitat. This means that they are tolerant of dry periods but don't require them. |
| | | | | | The EIR identifies that these species will be impacted but will recover over time. Since areas of sandbank will remain intact these will provide a source of recruitment to inhabit the newly dredged areas. |

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| | | | | | With dredging depths of between 1 – 2 m these habitats will remain similar to those present in the estuary currently. |
| 105 | 65 | Again further careful investigation of this delta in order to assess the viability of these deposits is recommended. | Dredging Sandriver | - comments on the proposed dredging of the Sand River delta. | The Estuarine and Dune Ecology Specialist Report includes locations of samples tested for similarity with the St Francis Bay beach sand. The sand is compatible. It has been reported that there is a possibility of debris both at the Sand River delta and in proximity to the road bridge. At this stage sufficient sediment is deemed to be available even if these areas don't yield the full quota. |
| 653 | 142 | STATEMENT:sand bank that are vegetated with dune vegetation do occur within the estuary and within those areas expected to be dredged. Since this vegetation is indigenous, and exhibits a clear successional gradient, its loss will result, despite the fact that it has established as a result of altered flow regimes in the Kromme Is this a reference to the Sand River Delta area? | Dredging Sandriver | - We find this statement confusing as areas adjacent to Kromme Properties which have been defined as sensitive, which could impact upon the wellbeing of the area which in turn could have a negative impact upon Kromme Properties? | Yes, the section identified is referring to the Sand River delta. While the vegetation is indigenous it does not contain any vulnerable or protected species. The vegetation is referred to as primary vegetation which are generally species which colonise new areas as is evident in this location and likely as a result of the flood in 2011. |
| 103 | 54 | On what basis is this statement made. Is this an admission that things could be better or worse with the preferred alternative over time or what. All very uncertain? | EAP | No certainty in decisions. | The statement is identifying that sediment is likely to migrate back into the estuary from the beach over time. It has been included in this section to facilitate the understanding that the sediment taken from the Kromme is not lost to the estuary completely. Therefore, the returning sediment would result in the formation of features similar to those in its current state. |

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| 103 | 56 | As noted before these impacts must be subject to scrutiny by a specialist as this assessment is primarily based on studies performed over a decade ago. | EAP | Old information which decreases the ability to make a concerned decision. | In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. |
| 118 | 86 | As already noted this EIA is built around information presented over a decade ago which in a sense has no current application as there is no current data to compare and prove the stated views by the EAP on the impacts. There is no certainty in this study. | EAP | It would assist if the information presented could be current and up to date. This would help in the relevance of the project stated project impacts? | <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> <hr/> <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> |

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| | | | | | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 118 | 88 | <p>INCREASED VESSEL TRAFFIC - This is a very real issue as we have already lived through chokka boats in the river during the 1980's and the situation became very unpleasant for residents living close to the estuary.</p> | EAP | <p>This impact needs to be explored with respect to the further negative impacts and the administration of the policing of this impact. By opening up this estuary are we not adding another administrative layer in the form of policing and overburdening the local authorities who have other priorities?</p> | <p>The KRJC are mandated, by the local authority, to perform the management of vessels on the Kromme Estuary. The KRJC are currently undertaking this function.</p> |
| 118 | 89 | <p>All the incidents noted over the 2019-20 season in the Kromme estuary could be tied to issues such as human behavior, lack of competency of skippers, boat speed, power, limited policing and human aggression, which is seriously scary. Making the channels more navigable is not the prime factor to increase safety, this is just a poor justification for removal of sand from the estuary.</p> | EAP | <p>refer to above comment.</p> | <p>Noted.</p> |

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| 118 | 90 | We wish to remind you that Phase 1 of the upgrading, and the implementation of new revetments are still in place which if managed correctly would provide protection to the backshore infrastructure. | EAP | The presence of rock revetments on the backshore of the beach if constructed in accordance with the appointed engineers design criteria would offer a 15 year protection window. Sadly due to circumstances this has not happened and several revetment sections have failed. | There is clear recognition in the existing Environmental Authorisation that the revetments authorized are deemed to be temporary and there is clear instruction to investigate a more permanent solution. Refer to Advisian engineering report which comment on the previous studies for this frontage. Appendix H contains the previous Environmental Authorisations applicable to this project. |
| 125 | 100 | We view the EAP's closing statement regarding the Estuary as 'a cover statement' for any problems occurring at a later date. It also reinforces our view that the materials presented in this study are insufficient and incomplete and in all probability resulting in a negative Authorisation. | EAP | refer to above comments on this subject. | <p>The emphasis on the monitoring in this section is recognition that the Kromme Estuary contains sensitive habitats and confirms that due care needs to be exercised in a project of this nature.</p> <p>The EAP is committed to ensuring the project is executed in the most appropriate manner and is including recommendations to ensure that.</p> |
| 165 | 102 | <i>Statement - The Phase 1 Authorisation for Rock Revetments is a temporary:</i> The rock revetments designed by PRDW have a 15 year life span, and yes in a way it is a temporary solution. It would be appropriate to ask the engineering specialist to give some indication as to the engineering life span of the proposed groynes? | EAP | Life span of the proposed groynes? | This information is available in Section 2.4 of Advisian's Preliminary Design Report (Appendix F) – 50 years. |

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| 556 | 103 | Different era and different volumes which does not match as to what is actually going to happen, Inferences from old data and different situations is a risk. | EAP | ditto as per previous comments on this issue. | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 557 | 104 | We are talking about a potential impact, however how that without following scientific due process and using secondhand material nothing stated here gives a feeling of confidence? | EAP | ditto as per previous comments on this issue. | <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> |

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| | | | | | In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. |
| 562 | 111 | Again where is the up to date current information? | EAP | Up to date information. | See comment above. |
| 562 | 112 | STATEMENT - On a broad-scale, an unacceptable change is considered to be significant erosion of the inter-tidal areas as well as any subsequent catastrophic damage to existing infrastructure - Is this is a real possibility? | EAP | What would the impact be on Priority Area P2.? | This is a qualification of what would be considered to be an unacceptable change to the estuarine system as a result of the dredging. Based on the current proposal this is unlikely. Restricting the dredging to the channel and portions of the larger sand features retains the integrity of the intertidal areas and habitats along the banks of the estuary. |
| 564 | 113 | Why is area P2 excluded as an influence to the tidal prism above the bridge? | EAP | Query? | P2 doesn't extend above the bridge. Based on the updated information from Advisian (Appendix F of the EIR) the tidal prism will result in a lower water level (at low water) than experienced currently. This will also be experienced above the bridge should the full volume of sediment be extracted. |

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| 565 | 114 | Is this an admission that the existing modelling needs to be updated in order to gauge the significance of the proposed works? | EAP | Query? | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 565 | 116 | STATEMENT -No fatal flaw has been identified - How can a 'FATAL FLAW' be identified when less than adequate information is at hand. | EAP | <p>The question is: If further current studies were undertaken on those items mentioned above as requiring further information - would it be possible that a 'fatal flaw' would develop?</p> | <p>It is unlikely that a fatal flaw would be identified with further investigation. Further investigation would lead to possible refinement of dredging areas and the dredging methodology.</p> <p>The studies carried out in 2020 have provided the EAP with information that has allowed for refinement and additional confidence in the assessment of impacts.</p> |

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| 632 | 125 | Noted and agreed. This situation has been ongoing since the first dam was built in 1942 and has become progressively worse since 1982 when the Impufu dam was completed. This situation is not going to change. However it is also noted that several flood events have occurred over the above period where flushing might have occurred and due to the length of the Kromme estuary (14km) most flood waters loose their energy over this distance and flushing is diminished. Focus is always upon the two large dams upstream and if one views the estuary there are many other freshwater contributors to the system that just have not been notices or monitored? | EAP | A flood from the Churchill (50km upstream), the Impufu (4km above the tidal reach which is some 14km from the mouth), would have to be of momentus preportions to have the energy to pass over not only the the present day Wattle infested river valley, the various agricultural impoundments, and then over a 14km stretch of river, sandbanks, open valleys etc. to the lower Kromme and have the required energy to lift sand banks and take them out to sea? | Flooding would have the potential to move sediment. Depending on the magnitude, sediment from upstream would be transported to the lower reaches. |
| 637 | 128 | Monitoring and reporting are interesting mitigatory steps and over time these steps become a cost factor and are usually discontinued after an initial start. The success of monitoring by experience has been poor as the applicant and contractor usually ignore all monitoring recommendations due to cost and non compliance and thus these proposed mitigatory steps are likely to be unsuccessful. | EAP | statement on the viability of suggested mitigatory steps. | <p>The mitigation measures are enforced through the adoption of the Environmental Management Programme as a requirement of the Environmental Authorisation. Part of the recommended monitoring and election of an Environmental Control Officers would be to report to DEDEAT on the compliance of the contractor/proponent with those measures included in the EIR. The risk to the contractor/proponent would be revoke of the EA should the authority deem necessary.</p> <p>It is also likely that local conservation and interest groups would be monitoring the activities either formally or informally and raise any concerns at the earliest opportunity.</p> |

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| 650 | 140 | STATEMENT: Baseline data needs to be collected prior to construction - including Sediment contamination testing; Bathymetry; Groundtruthing. - One would expect that the baseline data would be collected prior to Authorisation | EAP | It is recommended that further baseline data is necessary for a competent decision. | The collection of baseline data prior to construction is to inform the subsequent monitoring effort during the construction and operation of the scheme. The EAP is confident that sufficient information on the baseline is available for decision making. |
| 88 | 37 | The present estuary ecological status of 'largely modified' will with this project be 'totally modified' after the project. Will the Importance Score remain and could we ever become 'a desired protected area'? The ecological sensitivity and ecological importance are both high. The proposed project must avoid all areas of high sensitivity. Areas considered to be of moderate sensitivity could withstand some loss, however this should be avoided as far as practical (page 41) | Estuary Status | It is understood that the Kromme Estuary has been modified from its original form with the blame placed on the two dams the first of which is approx 14km upstream from the estuary. In a sense one understands that the present status quo is partially a result of this but there have been momentum changes to the environment of the area since 1982 when the last dam was completed. The point here is that the current status quo which is now going to be altered to the extent that our sense of place and being is going to be impacted yet again as it was when the estuary was used by the Chokka boat fleet. Will the Kromme ever reach the status of 'a desired protected area' | <p>This scheme will provide modification but the system will still operate naturally. There is no hard engineering associated with the dredging activity. Similarly, once the construction phase is complete, small volumes of material will be required – likely to be taken from the mouth area.</p> <p>There is likely to be modification to some habitats. However, the estuary will retain its ecological function.</p> |
| 89 | 39 | What about the floods in 2006 -7, and wet periods during 2009 culminating in the 2011 floods. | Estuary Status | It is noted that the current state of the Kromme estuary is a result of the lack of fresh water flushing. It is noted that we have had several floods which have altered the estuary and the impacts of these have yet to be studied and published. The status of the estuary to day is just not known. | Estuaries are dynamic by nature and are influenced by natural and anthropogenic factors. Section 6.9 describes the ecological characteristics of the estuary based on the Estuarine and Dune Ecology Specialist Report (Appendix J of the EIR). |

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| 89 | 41 | One can understand that the direct freshwater inflow from Kromme river and tributaries in the past has diminished due to the two large dams, and farm water extraction but there are numerous other fresh water sources, such as streams, wetlands, ground water and floods (4 in the last decade) which are not even noted. These fresh water entities all contribute a continuous flow of surface and ground water into the system. As these do not seem to be recorded or even their existence acknowledged it is possible that although studies seem to have focused on the major impediments to freshwater flow such as dams and bridges, no one has looked at the | Estuary Status | We require up to date information on the Kromme estuary in order to make a decision to dredge. | The reduced freshwater reported is confirmed through the presence of submerged macrophytes who inhabit the intertidal and supratidal areas of the estuary. The vegetation is an indication of the physical conditions including the salinity. The open exchange with the sea corroborates the observations. |
| 90 | 42 | During peak periods of boat activity on the Kromme the impact of this activity is somewhat exacerbated to an extent by the tidal cycle which allows for boat access at high tide with restriction at low tide due to sand banks. This restriction at low tide has a positive impact upon this salt marsh as slower boat speeds at points close to the marsh allow for a minor generation of wake size. The impact and mitigation of boat wake impacts on the salt marsh as a result of the proposed dredging requires attention. Please note despite several notices requesting a drop in speed by boats at these points the opposite affect is observed which is to go faster in order to break through. These points cannot be policed 24/7. | Estuary Status | The point here is despite the restrictions existing in the estuary today, there is a positive side to these as it allows for both the river and those who live and play along its banks time to recover from the influx over the holiday season of large power boats moving up and down at great speed. | This is recognized in the EIR and the recommendations for the mitigation of the impacts include no-wake zones and enforcement of them. The KRJC have a responsibility to manage the activity on the Kromme and it is imperative that this take place even in the absence of this project. |
| 90 | 44 | Another impact not noted in this study on the health of the Kromme are illegal dams wellpoints and boreholes both in the canal system and on properties adjacent the Kromme. Sea front properties in the canal system within 100m of the HWM of the sea have access to water via well point. This provides an indication as to the importance of ground water to the estuarine system. | Estuary Status | The importance of ground water to health of the estuary is underestimated. | The project is not anticipated to have an influence on groundwater. There will be no hard engineering in the estuary and the groynes are unlikely to have an effect on groundwater given their orientation and depth of construction. |

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| | | | | | The vegetation observed is a reliable indication of the physical characteristics of the estuary which suggest that the system is influence by sea water. |
| 91 | 46 | Mudprawn – Upogebia Africana, Wonder worm under the decomposed shale beds, | Estuary Status | Kromme Properties Shareblock shore line is primarily shale with Zostera sp. & to the south Salt marsh at the mouth of the Creek river. | The mudprawn has been included in the description of the species present (Section 6.9.3 of the EIR) and Appendix J Estuarine and Dune Ecology Specialist Report). It is noted that wonder worm, a common bait species, occurs in the Kromme. |
| 95 | 47 | It would make sense to review and update the impact from a tourism point of view the opening up of river channels which would allow for unhindered access for boating in the Kromme estuary. As the last plan on the Kromme estuary was done 20 years ago it would be appropriate to update prior to the proposed works. One could then get a clearer picture of the impact as a result of the proposed works on the estuary on future tourism opportunities. As it stands the Kromme estuary and surrounds is totally oversubscribed during peak holiday periods being December and Easter. | Estuary Status | Again asking for more up to date information so as to make a decision relating to dredging. | <p>Vessels using the Kromme Estuary need to be registered to operate. This registration is mandated to the KRJC.</p> <p>Information provided by KJRC shows that the number of vessel licenses issued for the Kromme River has been fairly stable for the last 6 years, and has been slightly declining since 2017/2018. KJRC confirmed that they are constantly striving at improving safety and policing the river.</p> <p>Powered vessels are just one user type considered here. The EAP also considered the increase in non-powered vessels, canoes, stand-up paddle boards, etc.</p> |

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| 103 | 53 | The mitigation offered here will presumably protect the shale band along the lower reaches of the Kromme and further up the salt marsh below the bridge. What about the shale band coast along the southern bank of the Kromme opposite the salt marsh and the salt marsh on the southern bank further up the Kromme? This statement is misleading and requires direct clarification? | Estuary Status | Pointing out shale bands that are present elsewhere along the estuary which seem not to receive any attention at all? | Those areas sampled as part of the Sand Sourcing Specialist Study took place in areas where sand was anticipated to be taken from. The samples taken at depth did not encounter the shale material. As mentioned and indicated by the dredging areas, the banks of the estuary, certainly where there is sensitive habitat are not expected to be significantly impacted. |
| 103 | 55 | Surely the impact possible change in Hydrodynamics of the Estuary should be passed to a specialist who can assist in the possible mitigation of this impact? As the river was last modeled over a decade ago a new study is warranted? | Estuary Status | why cant this information not be available now? | <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> |

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| | | | | | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 103 | 60 | <p>The impact could be mitigated/reversed but there will be some difficulty in ensuring effectiveness and/or implementation, and significant costs. One can understand that it would be 'difficult' to reverse these negative impacts but it is believed that the dredging of the Kromme Estuary will just hasten this process. Maybe these issues must be dealt with prior to further works on the estuary?</p> | Estuary Status | <p>once dredging has started there will be no going back to the present status quo in the estuary.</p> | <p>The presence of marine sand in the estuary and the development of sand banks in the estuary over time is due to the flood dominant estuary characteristics meaning that the dominant tide is the incoming one and this imports material into the system. While the morphology of the estuary may change it is anticipated that marine sand will continue to be imported into the system.</p> |
| 103 | 57 | <p>Noting that the influx of boaters increases primarily during statutory holidays, it is also noted that with the increase of permanent residents and in St Francis Bay and surrounds the river is a focus of an increase for small to medium boating during the year. We have just experienced a Christmas where there was a massive increase in boats, jet skis, jet boats, sups, kite boarding and general beach activities. The river officials one can state were stretched to the limit and the total disregard and arrogance of boaters to both the officials, general</p> | Estuary Status | <p>The estuary seems to have exceeded its carrying capacity at peak times.</p> | <p>Information provided by KJRC shows that the number of vessel licenses issued for the Kromme River has been fairly stable for the last 6 years, and has been slightly declining since 2017/2018. KJRC confirmed that they are constantly striving at improving safety and policing the river.</p> |

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| | | public and 'rules of the road' was witnessed. More accidents occurred over this period than ever before, and regretfully two people died in boating related incidents. The river seems to have exceeded its 'carrying capacity' over this period what will the affect be when the river is navigable at both tides but large engined boats? PS the present signage on dangerous sections of the estuary seemed to be in most instances ignored during the season. | | | According to KJRC there have been no fatal injuries during the holiday season 2019/20. Two people were injured. |
| 103 | 48 | We cannot view this estuary as 'now' and 'then', as it is a dynamic system one cannot influence the present by stating that the conditions in the past 'may' be better than the present - the fact is we dont know and will never know. We are dealing with the impacts on the present and PLEASE look very carefully to the future. That is what is required. | Estuary Status | Kromme Properties Shareblock has been around since 1949. This property has experienced the effects of impediments of both dams, the building of the Kromme Bridge, drought, the building of the marina system, and having the chokka fleet parked on the opposite bank of the estuary. We are very reluctant to experience another impact such as the dredging especially as the information provided is not convincing at all. | The modification of the system through the development of the dams has led to its present state. This is well researched and documented. Prior to modification the system would have been in a more natural state. Under the natural state the flushing of the system would have occurred regularly and that would have kept the estuary clear of macrophyte growth and excessive sediment build-up. The present state is one that is modified leading to an increase in habitat deemed to be sensitive. |

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| 103 | 50 | The previous study was performed over 14 years ago and for whatever reason was not submitted for Authorisation, so it should not be used to highlight the present study which is within a totally different decade, | Estuary Status | The use of possibly out of date information to make such as momentus decision is not accepted. | Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known. In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. |

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| 105 | 64 | <p>This impact will be exacerbated by the difficulty of removing the debris laden deposits which make up the greater portion this delta. Since 2011 the delta has decreased in size as the incoming and outgoing Kromme tides erode the delta along the Kromme estuary. The Kromme channel is almost reached its 2011 position. In addition the prevailing winds have allowed for the formation of foredunes along the canal homes to the south. These dunes in some instances block north west views from these properties, but more importantly provide a wind shadow to these properties from the prevailing westerly wind. To the west of the delta the Sand River still runs as this is the lowest point. Salt marsh vegetation has established itself, as there are seeps and weeps from the Sand river and the adjacent wetlands. It must be noted that with the 2012 flood and formation of the delta, all the Bloodworm, Pencil Bait, Pink Prawn and Mud Prawn populations were covered with up to 2m of deposit and these populations were lost. It is noted that there was a statement made that the Kromme Estuary had the largest Pencil Bait population in South Africa, with the 2012 flood these organisms were to a large extent decimated (this is subject to validation).</p> | Estuary Status | comments on the proposed dredging of the Sand River delta. | <p>The Sand Sourcing Specialist Report (Appendix I of the EIR) includes locations of samples tested for similarity with the St Francis Bay beach sand. The sand is compatible. It has been reported that there is a possibility of debris both at the Sand River delta and in proximity to the road bridge. At this stage sufficient sediment is deemed to be available even if these areas don't yield the full quota.</p> |
| 105 | 63 | <p>Prior to the St Francis Port the chokka industry used the Kromme Estuary as a port and at that time there seemed to be a 'marinisation' of the lower Kromme estuary with the appearance of Sea Urchins along the shale band shore in great numbers and Red Bait, octopus, mussel and cuttle fish.</p> | Estuary Status | comment and note. | Noted |

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| 106 | 69 | As a result of the 2011 floods large areas of sand river delta was covered with sand resulting in a consequential loss of major bait populations (blood-worm, pencil bait, mud and sand prawn). With subsequent erosion of this delta resulting in the deposition of sand to the east and west of the delta which now is a new home to populations of blood-worm, pencil bait and sand prawn.. The loss of the biggest bait populations on the Sand river delta in 2011 was a blow and now the new populations are a target for dredging. As there is no monitoring of these bait species at this time, one would at least expect some sort of census for this estuary so as to establish whether the net impact of dredging will be on this resource? Impacts cannot be measured without actual ground data. | Estuary Status | The removal of sand banks will result in loss of major bait collecting areas within the estuary. | The smothering of bait species and subsequent re-establishment at the sand river delta is evidence that these species recover. The proposed sand take from the Sand River delta is not to extract material from the entire area but will leave sufficient habitat to facilitate re-establishment of the newly dredged areas. |
| | | | | | Note that bait species are present at numerous points along the length of the estuary. |
| 106 | 68 | This is the crux of the proposed project as we are not only changing the ecology of the estuary but are now limiting the present accessibility to recreational areas of the estuary. The short term nature of the dredging as stated here cannot be true as the disruption of parts of the estuary during dredging with machinery and pipes etc will be a factor. These pipes will cross channels and need to be dismantled at peak times and the requirement for top-up nourishment will be ongoing for years? | Estuary Status | The presence of excavators / dredger may result in some areas of the estuary having restricted access for public safety | The safety zone around the dredger is likely to be 100 m. The piping is unlikely to have safety zone and with a diameter of less than 300 mm is unlikely to limit the use of the beach/sandbank etc. There is a recommendation that dredging will not take place during peak holiday periods, as is presently the case with the canal dredging. |

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| 107 | 70 | <p>Yes this will be a big plus for those boaters who have large power boats up to 6.4m. The jet boats dont necessarily follow the designated channels as they can operate in 0.4m of water and have become a problem for boaters and fishermen. For those who live alongside the estuary this is a problem as power boats seem to be oblivious of swimming, paddlers, canoes, dinghy fishermen and sailing craft. This is a disaster waiting to happen - as the river authorities are abused and threatened by these aggressive boaters. It just not fun anymore, is unsafe and poses no recreational value to anyone!</p> | Estuary Status | <p>Noting possible negative impacts relating to the removal of sand from within the channels.</p> | <p>As mentioned in Section 7.2 and in response to these questions that have been raised previously. It is recognized that activity (motor boat, paddle boat, swimming) levels are likely to increase. The impacts have been included and there is recognition that management of the activities requires consideration. This is particularly relevant to motor boats. Currently the Kromme River Joint Committee (KRJC) have been mandated to ensure that this activity is managed appropriately and safely. This remains their mandate and the EIR re-enforces it. This includes no wake zones, demarcated channels, adequate signage and speed limits.</p> <p>The EAP has taken an objective approach in their consideration of the affected persons and does not favour any particular group.</p> |
| 115 | 79 | <p>Sand compatibility is only one aspect of this study there are several other more pertinent studies such as hydrographical/hydrological which are critical to the dredging source.</p> | Estuary Status | <p>this refers to a previous comment on the issue of sand compatibility?</p> | <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> |

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| | | | | | <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 119 | 91 | These impacts could irrevocably change the Kromme estuary as it is known today and without current survey data and modeling which could provide a much closer view of the listed impact? | Estuary Status | <p>The proposed dredging of the estuary is a drastic measure and will irreversibly alter the current status of the estuary. We request further up to date information to back up this planned project so as to provide a greater level of confidence in the proposed works.</p> | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change</p> |

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| | | | | | significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. The impacts identified and presented in the EIR do not suggest that the change will be detrimental. |
| 123 | 96 | The volumes of sand primarily occurring in the lower estuary in accordance with the tidal cycle from the Kromme mouth. Natural floods from the source are infrequent and their contribution is limited in this section of the Kromme estuary. However the Sand River can provide sand material as evidenced in 2012 when alterations to a existing river course occurred. | Estuary Status | Potential sand source. It would be appropriate to explore the Sand River below the R330 bridge as a potential sand source. | A portion of the Sand River is targeted for dredging. See Section 2 of the EIR. |
| 124 | 97 | Is the statement that the existing modeling is not sufficient to quantify the significance of dredging required - Is this an admission that the evidence presented to date on the dredging cannot be used to quantify the significance? If so why has this not been done as a matter of course and presented for comment in this study. | Estuary Status | Is this an admission that the figures as presented in this EIA could change, and if so what are the potential impacts relating to a decrease or increase in sand source? | <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> |

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| | | | | | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 124 | 99 | <p>Same again 'Ground truthing the distribution of habitats - Again one makes the point this should form part and should be made a requirement as part of this EIA. Nobody can make a decision based on the material presented?</p> | Estuary Status | refer to above comments on this subject. | <p>The ground truthing is to inform the subsequent monitoring of the construction and operational phases of the scheme.</p> |

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| 558 | 107 | <p>The normal impoundment statements relating to two dams, the last completed in 1982, are given as the cause for all our estuary problems. However, one must realise that flood events of the size and nature to move shift sand from the lower estuary are rare and do not occur often, and it is doubtful if they will have the energy to move built up sediments on the scale to clear the lower estuary? Several recent good rain years (2006, 2007, and 2012) are noted and in each instance the lower estuary has increased in volume, size and the whatever flow observed was directly affected by the nature of the incoming and outgoing tides. It is these tides that seem to determine the amount of erosion along the lower estuary. During the 1982 flood, where the Impufu dam filled up in 5 days and overflowed into the Kromme, The size, volume and colour status of the lower Kromme in 1982 was no different to the more recent floods mentioned above. The exception was the 2011 flood which dumped a considerable volume of sand into the Kromme estuary via the Sand River tributary. This was a result of the opening a dune slack that had filled with water on the St Francis Links. At that time it was estimated that the deposit of sand was in the region 180,000m³. This sand mass effectively covered a large tidal area of the Kromme estuary which supported populations of mud, sand prawn, and bloodworm. These populations were decimated as a result of this flood event. In spite of the presence of the impoundments the lower Kromme estuary is very much tidal dominated with 'seasonal' freshwater input from upstream, tributaries, wetlands, groundwater and the many salt marshes adjacent this estuary. Most of these sources are not as yet documented.</p> | Estuary Status | Just a different view on the impoundment issue. | Noted. |

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| 559 | 108 | <p>The cause and comment on the deviation of the main estuarine channel are noted. It been observed that there have been changes in the alignment of the main estuarine channel(s) in the past as is evident from aerial photos of the lower Kromme area since 1942. Would it not be possible to map the existing and compare to the past so as to provide a measure of leeway in dredging planning? Or alternatively is it possible to model the present river state and view the likely result by introducing changes? A estuary mouth open to the sea and able to provide safe passage is important?</p> | Estuary Status | a need for detail and understanding of the dynamics of the present day estuary. | <p>The Sand Sourcing Specialist Report (Appendix I of the EIR) together with the Estuarine and Dune Specialist Report (Appendix J) contain information describing the current characteristics and future scenarios.</p> <p>The Kromme is characterized by an open mouth which is an important feature of this estuary. This is likely to remain the case as a result of the project.</p> <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |
| 565 | 115 | <p>Dredging has the potential for significant changes to the hydrodynamics of the of reaches of the Kromme estuary, but the beneficial impacts are increase navigability and increase capacity for water based activities.</p> | Estuary Status | Positive impact - noted. | Noted |

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| 587 | 117 | STATEMENT - The Sand River's contribution the the freshwater inflow into the Kromme system is negligible - This statement is misleading since 2006 the Sand River could be rates as a major contributor of fresh water to the lower Kromme system. | Estuary Status | noted comment. | The Sand River is an intermittent contributor of freshwater into the Kromme. Even though there may also be large flooding events effect of the freshwater on the system is temporary. |
| 613 | 121 | STATEMENT - Sand River (approximately 2 km upstream from the mouth). This tributary deposits a small amount of sand into the estuary on the southern bank, which is then spread upstream and downstream in the estuary by the tidal currents.- On one event in 2011 where it is estimated that the Sand River dumped approx. 180,000m3 sand, and other flood debris into the Kromme. It is obvious that the specialists are not aware of the 2011 event and its impact on the estuary? | Estuary Status | Correction relating to assumptions regarding the impact of the Sand River on the Kromme estuary? | There may have been a considerable once off contribution of sediment to the estuary. However, in the context of the entire estuary and the infrequent nature of the flooding this has not been considered a consistent source of material. |
| 632 | 124 | Please refer to areas of heavy wake erosion from boats which have to cross the estuary from one channel to the other. Slide XX Appendix A. Where the main estuary channel passes close to salt marsh area, boats at speed with large wakes will progressively damage the salt marsh. There are two known areas in the lower estuary which require mitigation. | Estuary Status | There are two areas where wake erosion has impacted in both cases on the wellbeing of the adjacent salt marshes. The deepening of the channel which increased boat speed as a result of dredging could accelerate erosion in these area and initiate others. It would be appropriate for mitigatory measures relating to these areas be recommended on these sites and others as policing all year round is just too costly? | Mitigation for existing erosion along the banks of the estuary do not form part of this project. The mitigation proposed for the effects of wake as a result of increased number of vessels is through management of vessels. This is through the KRJC who are mandated this responsibility. |
| 633 | 126 | STATEMENT - reduction of freshwater in the estuarine system becoming marine dominant - Noted and observed, but after a good flush of rain some marine species dissappear from the lower reaches of the estuary. | Estuary Status | comment on marinisation. | The influence of the freshwater events are temporary in nature. The marine characteristics return quickly. This has been well researched and referenced in the EIR. |

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| 634 | 127 | The sand bars in the middle of the estuary support an abundance of benthic species. The loss due to the 2011 floods has been noted but the new sand bars as a result of erosion on the delta has provided alternative habitats for benthic species. | Estuary Status | | Noted. |
| 637 | 130 | STATEMENT:Monitoring of sensitive habitats in close proximity to dredging activities must be implemented during both the construction and operational phases of the project. This will reduce impact significance to low negative. Monitoring and reporting are interesting mitigatory steps and over time these steps become a cost factor and are usually closed down. The success of monitoring by experience has been poor as the applicant and contractor usually ignore all monitoring recommendations. Mitigation in this instance will fail. | Estuary Status | statement on the viability of suggested mitigatory steps. | <p>The mitigation measures are enforced through the adoption of the Environmental Management Programme as a requirement of the Environmental Authorisation. Part of the recommended monitoring and election of an Environmental Control Officers would be to report to DEDEAT on the compliance of the contractor/proponent with those measures included in the EIR. The risk to the contractor/proponent would be revoke of the EA should the authority deem necessary.</p> <p>It is also likely that local conservation and interest groups would be monitoring the activities either formally or informally and raise any concerns at the earliest opportunity.</p> |
| 641 | 133 | STATEMENT:A detailed management plan for water based recreational activities should be drafted, implemented and monitored to ensure safety and inclusivity. Long overdue - should be implemented prior to the commencement of any dredging activities on the Kromme. | Estuary Status | An estuarine management plan for the Kromme is important. The question here is does those in authority understand the dynamics of the all the communities using the Kromme including the same for the estuary itself? | The management of water based recreational activities is not part of this project. The KRJC has a mandate for this responsibility. |

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| 29 | 8 | It must be noted that a phased Implementation based primarily on financial consideration is crucial to the viability of such a project. The lack of necessary or adequate funding could be viewed as a fatal flaw for well-being and continuity of this project? | Funding | Phased approach due to funding. | A phased implementation of the abovementioned coastal beach protection infrastructure will most likely be required due to financial constraints. Should funding for the full scheme be available at the time of construction then the full scheme will be developed. However, the design of the scheme is such that each phase can be regarded as a standalone project, allowing for funding for additional phases to be sourced prior to their construction. As funding becomes available, each of the phases would be reviewed and revised, as necessary prior to implementation. |

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| 29 | 9 | Surely the engineers can provide more comfort to the funders of this project which at this stage include primarily ratepayers, as to the possible success or failure of the design presented in this EIA? At what cost are the desired/possible design adjustments during construction of a groyne be to the overall cost of such a project? This question places any design element made on the bases of current information suspect. | Funding | Issue relating to lack of detail at this stage of the project as the public and stakeholders are being asked to support this project with no finite details? | As is the case with any project, cost estimates become more accurate as a project progresses through the various stages of project development. A detail design cost estimate is more accurate than a preliminary design cost estimate. The final cost of a project will only be known upon completion of a project. The preliminary design cost estimate available at this stage is regarded as appropriate for the purpose of this EIR. A fairly accurate project cost will be known once tenders to carry out construction work are received. An adequate contingency amount will be allowed for at tender stage, and SFPO NPC has confirmed that no construction work on any phase will commence unless sufficient funding to complete that phase of the scheme has been secured. |
| 38 | 20 | What are the present and future implications of these Incremental Alternatives which are designed to lower potential impacts, will they have visual, financial, and or further implementation impacts on the proposed works now or at a future date? More detail explanations on these vital issues are necessary. | Funding | Incremental Alternatives which arise in order to mitigate impacts not noted in this study and the ultimate cost to the project? | <p>For the layout alternatives, refer to Section 5 of Advisian's Long Term Coastal Protection report. In 2020 Advisian refined the location and orientation of the groynes based on feedback from I&APs and the Department. Their report can be found in Appendix F of the EIR.</p> <p>For the technology alternatives, refer to Advisian's Spit Protection report.</p> <p>For the operational alternatives, refer to Section 3.3.3 of the EIR.</p> |

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| 123 | 92 | Funding will make or break this project as the sea is a dynamic entity which will always act upon the work area. The implications of the impacts added between phases have not been presented in this report? | Funding | This is the most critical aspect to the viability of this project. | The Preliminary Design assumes a phased approach to spread out the capital expenditure. The costs of the phases, material volumes and final configuration of each phase will likely change as the unprotected beach further erodes between the implementation of each phase. As funding becomes available, each of the phases may need to be reviewed and revised prior to implementation. |
| 123 | 93 | Note and has anyone considered the financial implications of the cost of the OPERATIONAL PHASE, as this is considered to run into perpetuity? | Funding | Again a vital aspect of this project? | Yes, the SFPO NPC, with the assistance of the KJRC and the St Francis Riparian Home Owners Association will ensure that the necessary maintenance is carried out. |
| 123 | 94 | Who is going to pay for this extensive and important monitoring program, as the Local Municipality, Provincial and National entities are not aboard for funding - one can understand that government funding is focused elsewhere at this time? | Funding | Ditto as above comment | A fairly accurate project cost will be known once tenders to carry out construction work are received. An adequate contingency amount will be allowed for at tender stage, and SFPO NPC has confirmed that no construction work will commence unless sufficient funding to complete any phase of the scheme has been secured this will include the mandatory monitoring which will be a requirement of the Environmental Authorisation. |
| 28 | 6 | The proposed groyne structures are grounded on the sea bed which in this instance one presumes to be a sand base? No mention of a grounding source such as bedrock is mentioned in this study. Experience tells us that a heavy rock structure will sink if not grounded on | Groynes | Possible subsidence & recharging | The detailed design of the groyne structures may take bed geotechnical characteristics into account. |

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| | | bedrock as is happening with most of the present rock revetments along the coast. As these revetments are founded on sand they subside and need to be re-charged on a continuous basis. As the proposed design for the groynes reveals no support for the groynes one presumes that these structures will have to be re-charged on a periodic basis? Why has the important impact not been mentioned or mitigated in this study. | | | The report does mention that maintenance of groynes and the beach will be required. However, the maintenance of the groynes is anticipated to be less frequent than that of the beach. |
| 30 | 11 | To minimize costs it would be appropriate to drop off loads as close to the specific work areas where possible. Double handling of materials is a costly and onerous task. | Groynes | Logistics of rock loading | Double handling is costly and it would depend on the ability of the contractor to place material based on tidal conditions. It is common practice to have a stockpile available to ensure work is not held up by the lack of material. Refer to Section 2.5.1.5 of the EIR. |
| 31 | 17 | To avoid double handling of rock it is an expensive process, ensure that deliveries of rock are well planned and co-ordinated and placed immediately into their final position. | Groynes | Rock logistics and design | Double handling is costly and it would depend on the ability of the contractor to place material based on tidal conditions. It is common practice to have a stockpile available to ensure work is not held up by the lack of material. Refer to Section 2.5.1.5 of the EIR. |
| 40 | 21 | Is this Option 1B the preferred option? | Groynes | Query relating to Groyne option | Option 1B is the preferred option. Refer to Section 2.3 of the EIR. |
| 55 | 30 | The word 'slow-down' and not 'prevent' would be more appropriate word for the groyne action in this instance, as it is clearly noted that the proposed groyne system cannot prevent erosion. | Groynes | The writer disputes the terminology used to describe the effectiveness of the proposed groyne system. It is noted by the EAP that Option 1B is less effective than others in controlling beach erosion. It is felt that the word 'slow down' would be more appropriate in this instance. | The sentence in the EIR mentions to protect the St Francis Bay beach from further erosion. It would be the created beach that would erode which in turn would be maintained. |

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| 85 | 35 | Why is the position of the Umzumawethu reef approximate and not mapped, this is a critical element in the placement of the groynes? Is this reef going to be an asset or liability to the proposed works? Again we are asking for approval for unknowns? | Groynes | It is held that critical information is not available for any reasonable comment to be made on this proposal. | The reef is not a critical element in the placement of the groynes. The reef is only approximately 1 m above the adjacent seabed. |
| | | | | | The position of the reef has since been confirmed using a satellite derived bathymetric survey. |
| 86 | 36 | These photos could be of any reef? Photo when where and how? | Groynes | Ditto as above comment | These photos were taken from a previous study (ASR, 2006). The photos were considered relevant because they are characteristic of local reefs and contains species common to reefs in the Eastern Cape. |
| 106 | 66 | Moderately Beneficial: A medium to long term impact of real benefit to the affected system(s) or party(ies). Other ways of optimising the beneficial effects are equally difficult, expensive and time consuming (or some combination of these), as achieving them in this way. | Groynes | Comment on the following text statement: 'The construction of groynes, coupled with sand nourishment will increase the width of the beach, and to some extent restore the habitat to what it was previously.' | Statement modified to: "The construction of groynes, coupled with sand nourishment will increase the width of the beach and introduce additional substrate. Historically, there was a significant beach with significant volumes of sand. These former habitats would be restored." |
| 106 | 67 | Is it not possible to actually determine the impact of the proposed groynes on existing sea life as this is only a 'MAY' and therefore is probably a thumb-suck? Recommend a specialist study on this aspect. | Groynes | Comment on the following text statement: ' may result in localised smothering leading to a potential loss of individuals and habitat.' | The relevant section has been changed in the EIR to reflect this comment. |
| 110 | 77 | This is an important point which leads to the question: What will the environmental impact of the proposed groynes be upon sea life, wave action, currents, backshore infrastructure, the open Kromme estuary mouth, and the stretch of coast towards Paradise beach on to Jeffreys Bay. Similarly what will the impacts be on the coast to the south of St Francis Bay? | Groynes | Little impact information regarding the groynes and their impact on the sea life? What will happen if the groynes have a major impact upon the calamari industry or totally destroys the current surf break? | The direct impacts of the scheme have been presented in the Estuarine and Dune Ecology Specialist Report (Appendix J), the Sand Sourcing Specialist Report (Appendix I) and the EIR (Section 7.2). |

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| | | | | | <p>Given that the groynes will be within the breaker zone the resultant effects are anticipated to be limited. In 2020 Advisian refined the design of the scheme through the relocation of and re-orientation of the groynes. The coastal model was re-run and the effects described in an engineering report (Appendix F of the EIR). The resultant change to the coastal environment was not anticipated to result in accelerated erosion to the northern bank of the estuary or to the beaches to the North. The nourishment is expected to increase the supply of sand to the northern beaches since the supply into the bay has diminished. The reports in Appendix F provide more detail.</p> |
| 42 | 22 | What happens if the source for this Operational Alternative proves insufficient or impractical? | Legislative | The viability of the Operational phase of this project is questioned with respect to its lack of detail and viability. | Appendix I Sand Sourcing Specialist Report identifies that there is a significant volume of sediment available for both the initial nourishment and maintenance purposes. In addition to the existing volume of material available it is anticipated that sand passing the Kromme River mouth is likely to migrate into the estuary since the estuary is flood tide dominant currently and anticipated to remain as such. |
| 50 | 26 | To this point Volume 1 of this study does not consider issues such as sea level rise (mentioned once before) and storm surges (except in general description). In terms of this the ICM Act these items are specifically mentioned as impacts that are noted as important. | Legislative | A requirement in terms of the Intergrated Coastal Management Act (ICMA of 2008) | Sea level rise and storm surge have indeed been incorporated in the design. Refer to Sections 3.4.3 and 3.4.2 of Advisian's Coastal Protection design report respectively (Appendix F of the EIR). |

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| | | | | | Sea level rise was not considered on the estuary / Kromme Properties Shareblock. As sea level rises it is likely that the water levels in the estuary will increase. The dredging of the estuary will have no bearing on sea level rise. |
| 50 | 27 | Can the present St Francis beach erosion be described as an intentional act or omission of that (an) organ of state or other person, been adequately motivated in terms of the ICM Act? | Legislative | A requirement in terms of the Intergrated Coastal Management Act (ICMA of 2008) | The EAP does not believe that the erosion is due to an intentional act. Section 4 of the EIR describes the need and desirability for the scheme including reference to the CMP and ICMA. |
| 50 | 28 | Has the ICM municipal requirements been fulfilled in terms of conditions stated in this act especially with regard to the Coastal Management program lodged by the District Municipality for this area, which we gather mentions this project but it is not dealt with in any detail. | Legislative | This EIA and scoping report is possibly contrary to the requirements of the ICM Act with regard to due process in that an Estuary Management Plan be put in place prior to this EIA? | <p>This project, which will take place within Coastal Public Property, is not a programme but a specific intervention with goals aligned to the provisions of the ICMA. It is to improve access to the coastline, improve its recreational value; ensure that the coastlines coastal protection functions can continue; and assist in protecting natural and built assets from sea level rise. The project does in fact align with the policy guidelines contained in the local CMP and the District level CMP.</p> <p>On page 163 the Final Kouga Municipality CMP talks to various development issues and risks and highlights the inappropriate locational of developments close to the high water mark, and the resultant threats due to beach erosion.</p> |

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| | | | | | <p>It then goes on to mention under the opportunities section on page 171 that the environmental assessment being undertaken on the coastal erosion and beach nourishment scheme in St Francis bay is an opportunity. Implicit in this statement is the fact that the Kouga CMP supports this initiative, and sees it as consistent with the coastal management programme.</p> |
| 52 | 29 | <p>Have the residents of Sea Vista been included in the public participation of this project and voiced their opinions on the proposed works? Are there any public meetings proposed for these residents as it is noticed and advertising to date have primarily been directed at the canal and village sections of the community. Of the two public meetings held to-date were any Sea Vista residents present at these meetings?</p> | Legislative | A requirement. | <p>Adverts were placed in national and local papers, notices around town and in areas frequented by all community members. See Appendix B for more information on the Public Participation Process employed for this project.</p> |

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| 63 | 31 | Has the Municipality in terms of the ICM Act drawn up a Estuarine Management Program for the Kromme Estuary and if yes, has the proposed project been included in such management program and has members of the public been invited to participate in such program as is required in terms of the ICM act? | Legislative | Similar issue as comment 50/28 above. | The ICM Act, via the prescriptions of the National Estuarine Management Protocol (NEMP), require Estuary management Plans to be prepared for the estuaries in order to create informed platforms for efficient and coordinated estuarine management. However, the role of a municipality as the responsible management agency was questioned in a recent case (Supreme Court of Appeal (SCA) judgment in Abbott v Overstrand Municipality (99/2015) (2016) ZASCA 68 (20 May 2016)). This case identified that municipalities implementing the NEMP is inconsistent with Section 156(1)(b) of the constitution and does not comply with section 156(4) of the Constitution. Section 154(1) of the Constitution places an obligation on the National and Provincial authorities to support and strengthen the capacity of local government to perform their functions. Only a small number of estuaries have an EMP developed, the Seekoei being the closest estuary. |
| 64 | 32 | This sort of answers my previous point. The question still remains are the proposed works part of this management program if not is this whole project legal? Surely a Estuarine Management Plan for the Kromme Estuary should be part or included or a prerequisite for this project? | Legislative | At this time a draft Coastal Management Plan for the Sarah Baartman District Municipality is at present open for comment. The question here is the above document legal in terms of the ICM Act to allow for these works to proceed without an Estuarine Management Plan for the Kromme? | See comments above. Note the CMP has now been finalised. |
| 90 | 43 | | Legislative | | See comments above. |

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| | | All the more reason to apply the requirement of the the ICM Act and perform a Management Plan for the Kromme Estuary with the proposed project in mind. | | Just a further comment about following what should be due process in terms of the legislation? | Note the CMP has now been finalised. |
| 103 | 58 | The water release requirements as set by Water Affairs for the upstream dams are not met, coupled with several illegal dam structures along the Kromme river, plus the presence of impenetrable invader species of vegetation along the Kromme fresh water sections of river leads to the conclusion that little fresh water of significance will does reach the Kromme. This has been the situation for many years and despite legislation to resolve this problem, action is limited from officialdom. A comprehensive Kromme River management plan is necessary to assist in mitigating these impacts. | Legislative | The Kromme River requires management plan prior to any changes. | The development of a management plan is not the remit of this project. See comments above for further information regarding the development of a management plan. |
| 103 | 59 | As already previously the 'other' sources of fresh water into the Kromme are numerous but not noted. Again a management plan should include these water sources and ensure that they remain at optimum flow to the estuary. These No-go Alternatives have been around for years, and should be treated as priority issues to be mitigated. | Legislative | Ditto as above comment | The management of freshwater flow in the Kromme will not alleviate the effect of erosion on the St Francis Bay beach. Similarly the responsibility for the development of the management plan is not the proponent's. All relevant stakeholder responsible for such plans have been invited and are included in the public participation process to provide comment accordingly. |
| 107 | 71 | Tourism & Coastal development is what started St Francis Bay and was self regulated by local government with support of various interest groups who's input was heard and noted. Sadly today this is no longer and St Francis Bay is loosing its unique character of being good at public participation. | Legislative | Noting a point: Interest groups and community involvement in this project is not as previous. | Noted. |
| 109 | 75 | Will these jobs be sourced locally or will they be brought in with a foreign contractor? For the estimated costs of over R180million 30 jobs are of minor consequence. | Legislative | reference to local employment. | This is expected to be direct employment as part of the project. Given that the method and nature of the works are based on limited specialized plant and acquiring resources from existing facilities (i.e. rock) 30 jobs are considered significant. There are anticipated to be many more jobs secured and/or |

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| | | | | | created indirectly through the tourism industry rejuvenated through the protection of coastal infrastructure and additional beach amenity. |
| 115 | 78 | Why are these studies not being done prior to Authorisation? We are being denied the right to comment on what a specialist(s) would say or view of the proposed works? This is the last stage of public participation. | Legislative | Again the detail supplied in several potential impacts is old and not up to date and as this is the last stage of public participation what happens if further queries arise on new found information? | <p>The extraction of sediment is likely to result in a change in the hydrodynamics – although according to the Advisian model (2020) not significantly so.</p> <p>The data and information used to develop the report is based on a number of sources (i.e. scientific literature, publically available documentation, previous reporting, specialist input).</p> <p>Historical data can be used together with expert knowledge to predict impacts associated with a project of this nature. While each system (estuarine in this case) can be complex the principles of how a system reacts to disturbance are well understood and the relationship between dredging and changes in hydrodynamics are well known.</p> |

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| | | | | | In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. |
| 115 | 80 | The key question is ' will there be an opportunity to comment of these critical studies still to be undertaken?' | Legislative | As this study is based on study materials which are in need of updating to the current decade, is the community going to be able to comment further on these new studies? | <p>In 2020, updated bathymetry data was obtained and Advisian performed updated modelling using the updated bathymetry data.</p> <p>Should any future studies result in the need to update the EIR by way of project description or the impacts, there will be an opportunity for the public to review and provide comment.</p> |
| 116 | 81 | This negates an ongoing participation by I&AP's, stakeholders and others the right to comment on the real thing? Today all we are commenting on is 'may' 'perhaps' | Legislative | Ditto as above comment | In 2020, updated bathymetry data was obtained and Advisian performed updated modelling using the updated bathymetry data. |

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| | | 'to be confirmed' statements which is very frustrating as data used is not current. | | | Should any future studies result in the need to update the EIR by way of project description or the impacts then will be an opportunity for the public to review and provide comment. |
| 116 | 82 | When the current IDP was published in 2017 it must be noted that none of the 4 objectives listed as being in-line with the IDP were not noted in the IDP or even mentioned. | Legislative | this project is not specifically mentioned in the IDP | <p>This project, which will take place within Coastal Public Property, is not a programme but a specific intervention with goals aligned to the provisions of the ICMA. It is to improve access to the coastline, improve its recreational value; ensure that the coastlines coastal protection functions can continue; and assist in protecting natural and built assets from sea level rise. The project does in fact align with the policy guidelines contained in the local CMP and the District level CMP .</p> <p>On page 163 the Kouga CMP talks to various development issues and risks, and highlights the inappropriate locational of developments close to the high water mark, and the resultant threats due to beach erosion.</p> |

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| | | | | | It then goes on to mention under the opportunities section on page 171 that the environmental assessment being undertaken on the coastal erosion and beach nourishment scheme in St Francis bay is an opportunity. Implicit in this statement is the fact that the Kouga CMP supports this initiative, and sees it as consistent with the coastal management programme. |
| 116 | 83 | Noted however the CMP mentioned only deals with coastal issues not estuarine areas, which still have to be undertaken in terms of the ICM Act. | Legislative | The coastal management plan covers the whole district coastline and the estuaries are mentioned but not in great detail. | |
| 117 | 84 | There are those who view this project as a means to enhance the well being of a group who are already economically secure and with the low numbers of potential employment opportunities presented definitely enhances such a view? Again one wonders if such a project was really envisaged when the NDP was drawn up? | Legislative | Does this project fall into line with overall state policy? | Coastal protection by way of piers and groynes have been deployed in South Africa for some time. During the 1950s groynes were constructed in an effort to counteract the severe beach erosion on the shoreline of the Golden Mile (KZN). |
| 118 | 85 | INCLUSIVITY OF INFORMAL SETTLEMENTS - This statement is hard to believe as there has been no Sea Vista meeting or comments from such? | Legislative | Public participation? | Adverts were placed in national and local papers, notices around town and in areas frequented by all community members. See Appendix B for more information on the Public Participation Process employed for this project. |
| 118 | 87 | The implication that this project is aligned with National, District and Local Planning policies is like fitting a square peg in a round hole. | Legislative | Yes and No? | It fits with the wider objectives. This is described in Section 4 of the EIR. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
|----------------|-------|--|------------------------|---|--|
| 30 | 12 | These figures relating to the rate of construction are extremely optimistic and are entirely dependent upon the size and weight of rocks. The envisaged groynes will each have to have their own access point from a higher level than the beach. At present the beach is only accessible a low spring tide and must be avoided at all costs as it is probable that the largest rock for the groyne will be in the order of 6 tons which cannot be double handled and must be loaded straight into its final position? Some serious logistic planning is required in this instance - so based on information supplied by the appointed engineers this aspect is a thumb suck. The impacts of such logistics need to be made known? | Project Implementation | Rate of construction optimistic due to ground conditions, weight, materials handling and on site conditions. Impacts need to be reviewed and published. | The tender documentation will require tenderers to submit, as part of their tender, their proposed methodology and programme. Each phase will include the construction of (a) groyne(s) as well as nourishment. Access to site will be part of the contractor's temporary works. The construction duration is considered realistic and is based on previous project experience and discussions with experienced contractors. The programme will of course be updated when the design is finalized during the next phase. |
| 30 | 13 | If one views the distances involved for the dredging of materials to the end point of the Beach, which is measured as 2,7km. The proposed dredging line along the Kromme River from mouth to 'River Tides' above the bridge is approximately 5km giving a total longest dredging line of 7,7km. To gain some comfort regarding the proposed beach nourishment and timing information from a specialist should be mandatory for such a project. The impacts of such are not directly discussed. | Project Implementation | Specialist input required as to the logistics of such a project with respect to dredging distance, trucking, site works and timing. | Section 2.5 of the EIR describes the methodology proposed for dredging and transport of material. The equipment and plant will need to be mobile and will need to set up according to the location and distance to the areas that require nourishment. The EIR (Section 9.7) provides an indication of no-go area which contractors need to avoid. Dredging from upstream of the R330 bridge to the main beach is likely not to be the most cost-effective option. Therefore, dredging lines are not expected to be 7.7 km in length. |
| 25 | 1 | It would be appropriate to understand the exact reasons as to why these three source areas were actually chosen, as it seems that this decision was only based on sand grain size? | Sand source | Reasons for choice | Please refer to Appendix I Sand Sourcing Specialist Report for detail regarding the preference of using the Kromme Estuary. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 26 | 2 | If alternate sand sources outside the Kromme such as the area just south of the Sand River Bridge (viewed in 2008 as a potential source) and the area to the west of Santareme with access to the sea via the Romazini Valley or via Harbour Rd. All available sources should have been explored. The decision to dredge the Kromme seems to be a prior decision placed upon the EAP? | Sand source | Alternative sources | Please refer to Appendix I Sand Sourcing Specialist Report for detail regarding the preference of using the Kromme Estuary and the alternatives considered. |
| 27 | 3 | Note that the estimated sand contribution from Priority Area 2 is 300,000m3 which is 53% of all the required sand for beach nourishment. This is the largest contributor of sand from Priority Areas. | Sand source | from Kromme Props. | Noted. P2 extends from the entrance canal to the marinas to the seaward side of the R330 road bridge. As described in Section 2 of the EIR the dredging will be restricted to the channel and portions of the larger sand bank features. |
| 27 | 4 | One important point to note - the sustainability of the chosen sand source for recharging the beach is not dealt with in any detail? The question is can the Kromme sustain continuous dredging through time for both base and maintenance nourishment on the beach areas? | Sand source | Sustainability over time | This is considered in Sand Sourcing Specialist Report (Appendix I of the EIR). There is a clear surplus of material available in the Kromme Estuary. Sand passing the Kromme River mouth from the initial nourishment is anticipated to enter the estuary due to the flood dominant nature of the estuary. This material can then be used for the maintenance of the beach. |
| 28 | 7 | Kromme Properties Shareblock is positioned adjacent to Priority Area P2. This area will be responsible for approx 50% of sand required from Priority areas for nourishment of the beach. | Sand source | Priority area P2 & will supply 50% of nourishment. | Noted. As described in Section 2 of the EIR the dredging will be restricted to the channel and portions of the larger sand bank features. P2 extends from the entrance canal to the marinas to the seaward side of the R330 road bridge. This would result in less than 25% of Priority Areas sand and less than 15% of the total sand sourcing obtained from this area. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 29 | 10 | The question here is 'Can the Kromme Estuary sustain the supply of sand required for annual maintenance' which leads to the question as to the sustainability of the Kromme as a sand source? If yes the users and residents along the estuary are going to have to live with dredgers, pump stations etc. present in the vicinity of the estuary for 'how long?' | Sand source | Sustainability over time | This is considered in Sand Sourcing Specialist Report (Appendix I of the EIR). There is a clear surplus of material available in the Kromme Estuary. Sand passing the Kromme River mouth from the initial nourishment is anticipated to enter the estuary due to the flood dominant nature of the estuary. This material can then be used for the maintenance of the beach. |
| 30 | 14 | The clearing of vegetation and or debris material from dredging spoils dredged from the Sand River mouth will pose challenges to the welfare of dredging machinery as this delta contains both rock and vegetative debris which originated from the Sand River bridge which was washed downstream in 2012. The status of materials in this instance will preclude dredging. | Sand source | dredging on the Sand River Delta will be impacted severely by the debris contained within the deposits. No alternative offered in this instance | The Sand Sourcing Specialist Report (Appendix I) includes locations of samples tested for similarity with the St Francis Bay beach sand. The sand is compatible. It has been reported that there is a possibility of debris both at the Sand River delta and in proximity to the road bridge. At this stage sufficient sediment is deemed to be available even if these areas don't yield the full quota. |
| 36 | 19 | P385 - St Francis Development_Zone_Priority (A3) - 2019.12.04 this Figure shows the southern portion of the Sandriver Delta excluded and P385 - St Francis Priority Areas_V2 (A4) - 2019.11.13, also shows the same area excluded? However the Kromme Site sensitivity 20012020, shows this area as 'High Sensitivity' but is included as a secondary dredging area B? What reasons or issue has allowed for this sensitive area to be dredged? | Sand source | Query relating to proposed dredging in sensitive areas of the Sand River delta? | <p>The figure has been revised based on the input from the dune ecology specialist.</p> <p>Section 7.2 of the EIR does mention that some sensitive vegetation will be lost from the system. This is deemed to be a moderate impact.</p> |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 79 | 33 | Why is Sand Source B covering an area of Salt marsh and within flow of the Sand River delta, which are in this study classified as a sensitive area. | Sand source | Again the proposed dredging of areas of Sand Source B which cover sensitive areas as noted in this study. Is this a mistake or intentional. If intentional please supply reasons as it will impact on Kromme Properties Shareblock and the Sand River Delta? | Sand Source B was the wider area within which sand was expected to be dredged. During the EIA process and based on the potential impacts, this area was refined (as were the others) to the priority and secondary areas. Section 2 of the EIR provides the refined dredging areas. |
| 88 | 38 | The attainment of any goal is dependent upon the desire or will to fix the problem, however in this instance we are being asked to downgrade the environmental integrity of the estuary for sand availability, where the whole of St Francis Bay is surrounded by massive sand sources. The argument here is why mess up an existing mess even more where there is an abundance of the necessary materials elsewhere? | Sand source | It is the view held here that the proposed use of the Kromme estuary as a sand source is problematical as the estuary is unquantifiable entity as there are just too many impacts acting one time. The information at hand is old and and the cost to update those studies to current status will be costly. The proposed dredging will alter the estuary permanently and with no real current information authorisation will be a high risk decision. It would less of a risk to look at alternative sand sources which are in abundance in the area. | In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR. |
| 89 | 40 | This sand accumulation, vegetation growth are both post the 2011 flood. Maybe the contribution from this source is underestimated? | Sand source | It seems that estuarine information relating to post 2010 until todate is not taken into account in this EIA? | The contribution of sand from the delta of the Sand River has been considered and included as a potential source of sand material (See Appendix I). The sourcing of sand from the Sand River itself was dismissed as a reasonable alternative due to the proclamation of a nature reserve. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 90 | 45 | Since 2011 floods which resulted in a major build up of sand in the delta in this area. | Sand source | Emphasising the importance of the 2011 Sand river events which impacted upon the estuary. | The contribution of sand from the delta of the Sand River has been considered and included as a potential source of sand material (See Appendix I). The sourcing of sand from the Sand River itself was dismissed as a reasonable alternative due to the proclamation of a nature reserve. |
| 123 | 95 | The question here is what if the bathymetric surveys of the lower estuary find a fatal flaw or the general recommendation is that dredging from this source cannot happen? The implication is that no reasonable backup sand source has been added to fall back upon and this will require the search for alternative sources as suggested previously. | Sand source | No alternative sand source - high risk. | Physical surveys of sediment particle size (2018 and 2019) demonstrated that there was sufficient sediment available. An updated bathymetry survey was done in 2020, confirming sufficient volumes are available |
| 163 | 101 | As already stated the areas of the lower Sand River, and the dune system behind Santareme both offer alternatives sources and are actually closer to the sea than the bulk areas of the Kromme estuary. | Sand source | refer to above comments on this subject. | This is discussed in Section 3 of the report. The sourcing of sand from the Sand River itself was dismissed as a reasonable alternative due to the proclamation of a nature reserve. The sand material at the delta of the Sand River has been included as a material source. |
| 587 | 118 | STATEMENT - Sand river - substantial accumulation of sand along this 250m of river bank. This accumulation was one event in 2011 where it is estimated that approx. 180,000m3 was dumped into the Kromme. | Sand source | noted comment. | Noted |
| 587 | 119 | On the Sensitivity Map of the Kromme Estuary - Why is an area denoted as Salt marsh and sensitive to be dredged? Please give a reason for this or is it a mistake? | Sand source | noted comment. | Section 7.2 does include for impacts on sensitive habitats. These impacts have been assessed as Moderate negative. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| 628 | 122 | Refer Plate 7.4 - Why is this designated sensitive area being removed? | Sand source | Sand source from a designated sensitive area is being removed - would like reasons for this decision? | <p>The contribution of sand from the delta of the Sand River has been considered and included as a potential source of sand material (See Sand Sourcing Specialist Study Appendix I and the Estuarine and Dune Ecology Specialist Study).</p> <p>Section 7.2 of the EIR does include for impacts on sensitive habitats. These impacts have been assessed as Moderate negative.</p> |
| 631 | 123 | Refer sensitivity map of Kromme The same question arises as previous - why is a sensitive area been selected for dredging? | Sand source | ditto as per previous comments on this issue. | Section 7.2 of the EIR does include for impacts on sensitive habitats. These impacts have been assessed as Moderate negative. |
| 46 | 23 | This paragraph is one of the only reference to sea level rise. Can it be clearly stated that despite the proposed intervention to protect the present coast that in time sea level rise will ultimately bury/flood/sink this project? Is sea level rise not the 'key impact' we should be focusing on, as sea level is a critical impact to the project. The choice of Option 1B allows erosion to continue, at a still to be determined pace? | Sea Level Rise | Sea Level rise its impact both on the proposed project design with regard to beach, estuary and long term viability of the current project? | <p>The engineering report (Appendix F) clearly states that the scheme has been designed to accommodate for sea-level rise.</p> <p>The adaptation to sea-level rise for the wider St Francis Bay area is not the consideration of this project. The long term adaptation to sea-level rise for coastal communities is consideration for local and regional municipalities.</p> |
| 47 | 24 | Since 1949 when Kromme Properties was established the Kromme estuary has provided a multitude of diverse/shifting channels over time and in a way these natural occurrences have become part of the essence of the estuary, now we seem to want to remove these impediments due to the desire for some to move their every increasing sized craft at great speed up and down the estuary or temporally prolong the life of a diminishing asset being the beach in the name of coastal protection? | Sea Level Rise | Two environmental processes which are very real issues not countered by the current proposal are Sea Level rise and Storm Surges. The second process is common to St Francis Bay which has experienced several of these events over the past decade | The priority material sourcing areas are associated with the existing main channel of the estuary. The anticipated approach as discussed in the report (Sand Sourcing Specialist Report in Appendix I of the EIR) is to take sediment from this channel and its sides. |

| Page Reference | SORT: | COMMENT | CATEGORY | REMARKS | CES COMMENTS |
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| | | We will still have those storm surges which damages and floods canal and river properties as did happen previously in 2007, 2008 and 2019. | | resulting in damage to both property and infrastructure within the canal system. Both these processes are covered within this proposal and it is possible that the proposal of deepening of the Kromme Estuary will allow for unintended impacts during such an event? | The dredging of the Kromme Estuary has no bearing on sea level rise. The coastal protection scheme has been designed with sea level risk in mind with the design accommodating for sea level rise and storm events. |
| 82 | 34 | It is interesting to note that the approval of this project will rely on studies done over 14 years ago. Surely up to date information is necessary for such an important decision? | Specialists | The heavy reliance on studies undertaken for this project over a decade ago and the use of this material to design and authorise such works is a risk to the ultimate viability of such a project? Just for interest the average age of the dates of references on one of the specialist reports was 1997. Further it is clearly stated that further tests, monitoring and reports are required prior to commencement of these works. If the department authorises these works on the information supplied then public participation on the additional studies is no longer available? | The data and information used to prepare this report was interrogated by specialists and deemed suitable for the determination of the impacts associated with this scheme. These same specialists have made recommendations for the collection of new data to provide a baseline against which the scheme can be monitored. The Kromme Estuary is a fairly well researched estuary (ecologically) and a review of the data suggests that the system is stable (although modified). |

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| | | | | | <p>In 2020 Advisian modelled the estuary and the pre- and post-dredging scenarios as well as a re-run of their coastal model for the refined design. The running of these models was performed using updated bathymetry data which was collected for both environments. The results of the modelling studies for the pre- and post-dredging scenarios show that the current velocities along the banks of the estuary are unlikely to change significantly (Appendix F of the EIR). The findings have been considered in the specialist reports (Appendix I & J) and the Section 7.2 of the EIR.</p> |

Table 6 Comments Received During the Public Review Period for the Environmental Impact Report (5 February 2021 – 8 March 2021)

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
|---|---|---|
| <p>Rod C Suter rod.suter@gmail.com</p> | <p>Comments for incorporation in EIR:</p> <p>This lack of vision by SFPO, the Sponsors of the present scheme, is a further indication that this project is not yet far enough developed, and to be seeking EIA approval at this stage is premature and reckless.</p> <p>Comment So as not to repeat my previous submissions, the following is to be read in conjunction with those previous submissions.</p> <p><u>1. Questionable Legitimacy of PPP Meeting 18 Feb 2021</u></p> <p>While acknowledging the realities of the Covid19 situation, it was always questionable that a valid PPP meeting could be held under the present circumstances.</p> <p>The virtual online meeting format instituted by CES/SFPO was clearly inadequate, as the technical requirements to participate were clearly beyond the capabilities and resources available to the majority of the local community. This is evidenced by the participation of only 8 actual members of the affected community – the remaining 6 attendees being SFPO officials. Even a cursory evaluation of the demographics of local community (many elderly, and many with a lack of computer equipment and expertise) would have revealed that this type of PPP meeting would not be successful, and it is surprising that SFPO elected to proceed.</p> | <p>Noted – previous comments and responses are included in the IRT above.</p> <p>The virtual meeting was the preferred platform to reduce the risk to the elderly population of which you refer of contracting COVID19.</p> <p>Accessing the virtual meeting may have been a new experience for some. However, with all IAPs including email addresses as part of their contact information a familiarity with digital technology was assumed. The platform used operates in a very similar function to other well-known video calling applications.</p> <p>In addition, particular emphasis was placed on making the SFPO facilities available for those who could not attend. There were facilities to watch the presentation and view the virtual meeting. This messaging was sent out regularly and clearly.</p> <p>As reported in the minutes much of the information discussed during the meeting is available in the documentation available for review.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>Accordingly, DEDEAT will be requested to reject this meeting as a valid PPP meeting.</p> <p>2. <u>Design of Proposed Scheme: Professional Peer Review Requirement</u></p> <p>The present proposed beach protection scheme of stub groynes is an option apparently selected and developed by just a single engineering firm – Advisian/Worleys – with the concurrence of SFPO.</p> <p>The impression of the current efforts by SFPO is an overriding and blinkered focus to get the presently designed scheme to proceed, regardless of the risks and possible long term negative consequences.</p> <p>There are many other types of solutions that should be considered before taking the irreversible decision to proceed.</p> <p>However there is no evidence presented of the evaluation of any other types of solutions by Advisian.</p> <p>It is therefore essential that an independent professional Peer Review process is undertaken, and undertaken NOW - a not unusual process for engineering projects. A Peer Review would then either confirm the present design, or would recommend the investigation of alternative and possibly better solutions.</p> <p>SFPO have previously conceded saying a Peer Review “might” be done during the detail design stage. This would be almost pointless, as by the detail design stage it is already much too late for a Peer Review to have any material effect on the present project design – it must be done NOW, before starting. There is plenty of supportive literature on this aspect and the inherent risks of not undertaking such a Peer Review.</p> | <p>Several studies have been undertaken since 1992 to evaluate and address the erosion of the St Francis Bay beach. Several proposals on possible remedial solutions were developed by various entities, a number of which have recommended groynes. In 2013 Kouga Local Municipality appointed WorleyParsons to make an assessment of all previous studies and to compile an updated report inclusive of indicative cost and timelines with the best or possible best solutions in solving the problems identified.</p> <p>Building on the available information and applying coastal engineering principles and modelling Advisian developed the following conceptual options further for consideration: Beach nourishment, beach nourishment + a groyne field and beach nourishment + offshore breakwaters. Different groyne configurations were considered. Beach nourishment + stub groynes was identified to be the most suitable option.</p> <p>SFPO confirmed that the Advisian design will be peer reviewed following the submission of the EIR to DEDEAT.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p><u>3. Cost and Budgets – Project Timeline</u></p> <p>The representative of Advisian at the meeting conceded that the present cost estimates they have prepared could possibly be only 40-50% accurate. This is a frightening admission when SFPO are considering a project funded by public money (particularly St Francis Ratepayers SRA extra Levy) and costing well in excess of R100 million.</p> <p>This problem is exacerbated by the present nebulous state of raising the funding required for the scheme, which SFPO seem unable or unwilling to definitively quantify in public. Funding problems will inevitably lead to significant delay in the timeline of implementation for the project - possibly unacceptable. The environmental and commercial risks of a long-term, delayed and possibly incomplete project are a significant danger to St Francis Bay, and must be taken into account by DEDEAT when evaluating approval of the EIA.</p> <p>This one fact is indicative that this project is not yet far enough developed, and to be seeking EIA approval at this stage is premature and reckless.</p> | <p>The intention of the response was to indicate a 40-50% confidence range. The accuracy of the capital infrastructure works cost estimate is 15-20%. The uncertainty about when sufficient funding will be available for each phase to commence leads to a confidence level of 40-50% at this stage.</p> <p>The actual cost of the emergency spit revetment constructed by the municipality is approximately the same as the estimated cost of Advisian's rock revetment. The dimensions of the emergency revetment is the same as that of Advisian's rock revetment, albeit that the revetment designed by Advisian will serve as the last defence (the 40 metre wide beach at a level 1 metre higher than the current beach level serving as the primary defence). This confirms Advisian's estimate for the spit revetment as being accurate and builds confidence in their cost estimates.</p> <p>SFPO NPC has confirmed that more than R12 million has already been set aside for this project, and that the available funds for the project will exceed R20 million by the end of 2021. A number of affluent and influential individuals have approached the SFPO, offering to contribute financially and assist with raising funding for the project. The SFPO will embark on a funding drive as soon as environmental approval is obtained.</p> <p>In addition, the St Francis Bay Riparian Home Owners Association, the Kromme Joint River Committee and individual Home Owners Associations and Share Blocks along the Kromme River pledged to contribute financially to the project.</p> <p>The municipality also confirmed that they will contribute and assist in raising funding for the project. The emergency revetment constructed by the municipality will already result in a saving on the project in excess of R5 million.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p data-bbox="562 469 1189 496"><u>4. Incorporation of Surfing Requirements into the Scheme</u></p> <p data-bbox="562 539 1256 632">The representative of Advisian at the meeting conceded that the focus of the scheme is sand retention, saying "The focus of the scheme is the coastal protection aspect."</p> <p data-bbox="562 675 1256 767">SFPO had an impromptu ad-hoc meeting in the Anne Ave. car park one day a year or so back, and also claim to have had "consultations" with the "surfing community".</p> <p data-bbox="562 810 1256 903">Based on this, SFPO have apparently instructed Advisian to move/realign some of the present stub groyne designs, and believe this is sufficient.</p> <p data-bbox="562 946 1256 1038">Many of the local surfing community have no knowledge of this consultation process and would like to be able to give their inputs.</p> <p data-bbox="562 1082 1256 1174">It must also be noted that this meeting on 18 Feb was the first time a representative from the Design Engineers, Advisian, participated in a PPP exercise – in spite of previous requests.</p> <p data-bbox="562 1217 1256 1335">The benefits of a sand retention scheme on the beach combined with developing surfing breaks is an opportunity that has immense possibilities, and which would greatly enhance the overall scheme and benefits thereof.</p> | <p data-bbox="1279 237 2045 461">The project will be phased. This phased approach of the SFPO NPC will ensure that construction of infrastructure in any phase will only commence when sufficient funding for that particular phase has been secured, and it will effectively negate the risk of partially constructed infrastructure. Each phase can function as a stand-alone project, and will provide protection to the piece of coastline flanked by the groynes constructed during that phase.</p> <p data-bbox="1279 469 2045 528">The design brief and principal aim of the scheme is and has always been coastal protection.</p> <p data-bbox="1279 568 2045 759">However, it was important to ensure that any comments from the community in St Francis were accommodated where possible. Advisian did take into account the comments received. They compared the earlier layout and the revised one in terms of the expected shoreline response and made layout adjustments in conjunction with the SFPO. During detailed design further minor adjustments can be made.</p> <p data-bbox="1279 799 2045 919">The revised layout addresses inputs from the surfing community (the southern groyne has been shifted to not interfere with the Anne Avenue wave and a number of shore-perpendicular elements have been incorporated) See Figure 2.6 and Figure 2.7 of the EIR.</p> <p data-bbox="1279 959 2045 1150">Included in the IRT below are comments from both the two surfing associations linked to St Francis Bay, namely The Seal Point Board Riders Club (submitted by Dylan Stephens, Club Chairman) and the Slipway Surf Crew (submitted by Barry Platt, Secretary). Also included in the IRT below are comments received from David and Phillipa Hill, both surfers that represented South Africa.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
|---|--|---|
| <p>Frank Silberbauer franksilberbauer@gmail.com</p> | <p>Having been notified that the Draft EIA for the above project was advertised for Public Comment for the period 05 February to the 08 March 2021, one would expect that project signs detailing information would be well posted along the 2.7km coast and also including the Kromme River area.</p> <p>No signage advertising this project was erected until the 14 or 15 February and what has been erected are possibly A3 laminated or smaller posters in the most strange places such as on the back of a bench where one has to kneel on the ground to read the sign as the print is so small (see attached photo). The signs viewed in two places are smaller than the statutory stipulated size?</p> <p>My query is did DEDEAT give a concession on the signage for this project as it seems to be totally inadequate for the purposes of a good Public Participation Process?</p> <p>We look forward to hearing from you?</p> <p>Maybe when you come down to SFB have a look at the signage which in my opinion too small not of recommended statutory size and just really the minimum for such an important project, but we all are entitled to our opinion, I just differ on this point.</p> | <p>Thanks for your email and your comment on the Public Participation Process on this project and its adequacy.</p> <p>The posters were placed at the following locations (photographic evidence will be included in the Final EIR):</p> <ul style="list-style-type: none"> • SPAR: A3 • SFPO Office: A3 • Municipality: A3 • Small Boat Harbour (inside): A3 • Small Boat Harbour (outside): A3 • St Francis Community Library: A4 • Sea Vista Community Library: A3 • Bruce’s Ocean Museum: A3 • Main Beach: A3 • Anne Avenue Parking Area: A3 • Kromme River Mouth: A3 • Pathway between Sea Vista and the Village CBD: A3 <ol style="list-style-type: none"> 1. All notices, except for the notices at the St Francis Community Library, the Sea Vista Community Library and Bruce’s Ocean Museum, were put up on 5 February 2021; 2. The notice in the St Francis Community Library was put up on the date that the Library re-opened (8 February 2021), after it was closed for a while due to Covid19; and 3. The notices at the Sea Vista Community Library and Bruce’s Ocean Museum were put up on 9 February 2021. <p>Advertisements appeared in the Herald (4th Feb), The Kouga Express (4th Feb), The St Francis Today (5th February).</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | | <p>As mentioned in the documentation the previous application was allowed to lapse to collect additional information. The updated Draft EIR forms part of the new application submitted under Regulation 21(2) of GN R. 982 in NEMA 2014 (as amended on 7 April 2017). This was deemed appropriate by DEDEAT in correspondence that will be provided as part of the Final EIR. Apologies for the poor-quality extracts below.</p> <p>Submission of Scoping Report to Competent Authority 21</p> <p>(1) If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report that has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments from the competent authority.</p> <p>(2) Subject to regulation 46, and if the findings of the scoping report is still valid and the environmental context not changed, the submission of a scoping report as contemplated in subregulation (1) need not to be complied with..</p> <ol style="list-style-type: none"> a. In cases where a scoping report was accepted as part of a previous application for environmental authorisation and the application has lapsed or was refused because of insufficient information b. On condition that regulation 16 is complied with and that such application is accompanied by proof that registered and affected parties , who participated in the public participation process conducted as part of the previous application , have been notified of this intended resubmission of the application prior to submission of such application. c. If the application contemplated in paragraph (b) is submitted by the same applicant for the same development, as applied for and lapsed or refused as contemplated in paragraph (a) ; and |

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| | | <p>d. If an environmental impact assessment report inclusive of specialist reports and an EMPr, which must 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, is submitted within a period of two years from the date of acceptance of the scoping report contemplated in paragraph (a).</p> <p>Regulation 41 (5) of the regulations provide guidance on the PPP required under such an application.</p> <p>(5) Where public participation is concluded in terms of this regulation for an application of proposed application, subregulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public process contemplation in regulations 19 (1) (b) or 23(1) (b) or the public participation process contemplated in regulation 21(2) (d) , on condition that:-</p> <p>This gazette is also available free on line: www.gpwonline.co.za</p> <p>246 No 40772 GOVERNMENT GAZETTE , 7 APRIL 2017</p> <ul style="list-style-type: none"> (a) Such process has been preceded by a public participation process which included compliance with subregulation (2)(a), (b) (c) and (d) and (b) Written notice is given to registered and interested and affected parties regarding where:- <ul style="list-style-type: none"> I. Revised basic assessment report or EMPr or closure plan, as contemplated in regulation 19(1)(b); |

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| | | <p>II. Revised environmental impact assessment report or EMPr as contemplated in regulation 23(1)(b) or</p> <p>III. Environmental impact assessment report and EMPr as contemplated in 21(2)(d);</p> <p>May be obtained, the manner in which and the person to whom representation on these reports or plans may be made and the date on which such representations are due.</p> <p>The intention with the PPP for this project has never been to just meet the regulatory requirements but to ensure that anyone interested in this project has the ability to provide comment. This is clearly demonstrated in the current efforts, detailed in Chapter 8 of the DEIR and with supporting evidence in Appendix B. To the point that the previous application was not submitted in order to accommodate comments made by IAPs - a significant contribution from yourself.</p> <p>The public notices and newspaper ads are above and beyond the regulatory requirements for this application but, as mentioned, the intention is to ensure all IAPs are able to review the documentation and provide comment.</p> <p>Notice was sent to all persons on the SFPO database via E-mail on 5 February 2021.</p> |
| <p>Briege Williams bwilliams@sahra.org.za</p> | <p>Interim Comment In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999) Attention: Mr Neels Kruger Neels Kruger ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) OF AREAS DEMARACTED FOR REHABILITATION FOR THE ST FRANCIS BAY COASTAL PROTECTION PROJECT, ST FRANCIS, KOUGA MUNICIPALITY, EASTERN CAPE PROVINCE</p> | <p>Noted</p> |

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| | <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the updated Draft Environmental Impact Report (DHIR) report for the St Francis Bay Coastal Community Protection Project, St Francis, Kouga Municipality, Eastern Cape Province.</p> <p>In February 2020 a Draft Environmental Impact Assessment and Archaeological Impact Assessment for the St Francis Bay Coastal Community Protection Project was uploaded on SAHRIS for comment. The Maritime and Underwater Cultural Heritage unit at SAHRA issued a comment in March 2020 recommending that a MUCHIA be undertaken to assess possible MUCH resources and to provide mitigation and management measures.</p> <p>A Letter of Motivation for exemption to undertake a Maritime and Underwater Cultural Heritage Impact Assessment was subsequently submitted by the applicant for consideration by SAHRA in May 2020. The letter set out the reasons for exemption and outlined comprehensive management and mitigation measures in connection to the proposed works. The MUCH unit issued a comment in May 2020 where they considered the reasons for exemption and agreed that a MUCHIA did not need to be undertaken as long as the mitigation and management measures set out in the letter are included in the Environmental Management Programme and strictly adhered to during the proposed work.</p> | |

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| | <p>In December 2020 an updated exemption letter was submitted to SAHRA which included changes to the buffer zone and the inclusion of a beach groyne. The beach groyne will be installed on a nourished beach level, approx. 1m higher than the existing beach level, therefore there is no anticipated impact on any heritage resources. The main area of concern for this project was the possible presence of shipwreck material relating to the Lady Head (1859) shipwreck and other possible cultural material in and around the river mouth. As the reduction of the buffer zone has no direct impact on the area of the river mouth SAHRA agreed to the new conditions set out in the updated exemption letter.</p> <p>These changes to the proposed project have been incorporated into the updated DEIR which has now been submitted to SAHRA for comment. SAHRA is in agreement with the recommendations set out in the DEIR and advises that the mitigation and managements measures laid out as part pf the project in regard to maritime heritage must be adhered to.</p> <p>SAHRA would like to emphasise the importance of making project participants involved in the proposed works aware of the possibility of encountering MUCH resources and the procedures to follow should anything arise.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> | |
| <p>David Hill mobydicksa@hotmail.com</p> | <p>My name is David Hill, and my wife is Phillipa Hill.</p> <p>We have been resident in St Francis Bay since 1953 . We have both represented the country in surfing and fishing. And have been involved in the ocean economy since 1975</p> <p>We would like to voice our support for the Groyne project and believe it will be hugely beneficial for the town of St Francis Bay with regards to tourism, fishing, surfing and various other beach and ocean activities.</p> | <p>Noted</p> |

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| <p>Dylan Stephens Dylanstephens007@gmail.com</p> | <p>To whom it may concern</p> <p>The Seal Point Board Riders Club committee of 2021 approve of the Groine project in St Francis Bay The Seal Point Board Riders Club has approximately 150 active members from both Cape St Francis Bay and St Francis Bay.</p> <p>Club Chairman Dylan Stephens. Club Secretary Simon Fish Treasurer Graham Tugwell</p> <p>Supporting Committee Jade Dace; Daniel Thornton; Andrew Lenten.</p> | <p>Noted</p> |
| <p>Ryan Donnelly ryazion@gmail.com</p> | <p>I also request that Franchswa Smit of Avisian has his name minuted alongside his answers for the last meeting and his comment on the lifetime of the project (50 years) and the status of Kromme sand in terms of not being an infinite source also be captured in minutes</p> <p>Gregory you mentioned larger grain size is optimal for beach protection.</p> <p>Which has the most amount of the large grain size sand, the Kromme or the Sand River?</p> <p>If there were no obstacles like perceived feasibility, which sand source would be preferable for protecting the beach and large enough source to be considered sustainable?</p> <p>What is in the way of you answering my question regarding sand? Will the final EIR contain the engineer's comparison of Groynes vs enhancing offshore reefs?</p> | <p>Noted – addressed.</p> <p>The sourcing of sand for nourishment has been dealt with extensively in the Sand Sourcing Specialist Report (Appendix I of the EIR)</p> <p>Larger grain sizes will result in steeper (more reflective) beaches, whilst smaller grain sizes will result in gentler sloped beaches. The ideal would be a grain size close to the naturally occurring grain size along the beaches. The Sand Sourcing report indicates that the Kromme grain sizes is generally similar to the beach grain sizes.</p> <p>The source material would need to match the beach material. Investigation focused on areas which are feasible. The Kromme River would still be considered the preferred source because the grain size is compatible and there is sufficient volume to accommodate the project. Feasibility is important and cannot be discarded.</p> <p>The sand is intended to be taken from Kromme River since it provides the required volume and is compatible with the beach.</p> |

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| | <p>Will there be a comment period for the final EIR? Thanks for getting back to me and I am glad we had that chat and cleared up the difference between an existing offshore reef and a non existing offshore breakwater. Yes they are quite different</p> <p>The white triangle in the bay is the Rushmeres Reef I am referring to. Based on typical ASR modeling of natural and artificial offshore reefs the yellow line is what I believe the beach profile would look like without the Rushmeres Reef (Sowetos reef) . Enhancing this reef would require approximately 1 meter of material further offshore and less to nothing as the reef gets closer to the beach. This project can theoretically be accessed and constructed from shore and I have a method of construction for it.</p> <p>Please observe and closely inspect on the google image the existing wave modeling and how the existing reef already affects the swell direction and St Francis bay beach profile.</p> <p>Benefits</p> <ol style="list-style-type: none"> 1. Far less material and finances required because 90% or more of the reef already exists and building above the waterline is not required. 2. Better visual aesthetics because the end result there would not be protruding rocks or concrete. 3. The sand would build up on both sides of the reef as it already is doing if the material stays below sea level and if the reef remains "permeable" 4. Better predictability of outcome, model already exists. 5. We already know where the bedrock is. The reef is the bedrock. The reef is the existing foundation. | <p>The Final EIR will not include any further alternatives. However, the engineers have provided a response to the idea of “enhancing offshore reefs” below. There will be no comment period on the FEIR.</p> <p>Whilst a submerged or low-crested structure is attractive in terms of visual aesthetics, habitat creation, and even potential surfing enhancement, designing a submerged structure, whether a submerged breakwater or an existing reef enhancement to ensure coastal protection is far less established than for emerged structures.</p> <p>The efficiency of such a structure in terms of coastal protection depends very much on the combination of water level variation, freeboard over the crest, distance from shore, prevailing wave conditions, crest width and effective length alongshore. A considerably more extensive design effort would be required to design an offshore reef structure that provides both coastal protection and surfing enhancement, as some requirements are contradictory.</p> <p>Whilst there has been improvement in the understanding of shoreline response driven by submerged reef/breakwater structures over the years, existing empirical shoreline response equations for submerged constructed reefs should be considered as suitable for preliminary design only and not for detailed design (Blacka et al., 2013). Shoreline response for a submerged structure is far more uncertain than for other beach control structures such as groynes or emerged breakwaters (Pilarczyk, 2018).</p> |

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| | <p>6. Based on the amount of tidal difference and current conditions only a thin layer of material approximately 1 meter further out to sea and less closer to shore is required to force the waves to consistently break much further offshore due to the already existing reef structure. This small amount of material can profoundly increase the reefs effect on the swell direction and beach profile because it would force the waves to break and when the waves break the modeling of swell direction around the reef has a marked change in direction and beach profile based on ASR reef and wave modeling and how it relates to beach profiles.</p> <p>7. The enhancement of surfing would be far more predictable and no guesswork would be required for the south part of the reef as a left hander because the existing shape of the reef already produces a wave that "peels" at a speed that is ideal for surfing. Simply enhancing the existing reef profile to be shallower is all that is required in terms of design to have a good surfing wave. To have the same desired result to the north as a right hander a design would be required as the reef on that side drops off or is deeper and does not have a wave that breaks desirably. Enhancing this reef would produce a wave similar to Klapains reef by paradise beach which is a huge asset to the surfers fiercely and historically possessed by a gang.</p> <p>How do I know only a thin layer of material is required? The waves "feather" from far out. When waves feather it means that the existing reef is there but just not shallow enough to break.</p> <p>For financial, aesthetic, tourism and surfing reasons I believe that Enhancing the Rushmeres Reef would be of particular value to the SFPO as an option and I would like to see it compared in the EIA to the current series of groynes.</p> <p>As all projects previously proposed, a permanent sand nourishment program would be required. This has usually taken back stage and in my opinion is the most important part of the beach solution.</p> | <p>The history of implementation and performance of reefs aimed at both surfing enhancement and coastal protection is also rather chequered, with notable failures such as that of the Boscombe reef at Bournemouth. Problems were also experienced with the Taranaki Reef and the Mount Maunganui Reef in New Zealand.</p> <p>The assessment of Blacka et al (2013) found that:</p> <ul style="list-style-type: none"> • Of submerged breakwaters around the globe that were aimed at coastal protection about 55% were successful at providing increased coastal protection; • One of five multi-functional artificial reefs around the globe may be providing a reasonable level of coastal protection; • Shoreline morphology behind reef structures often differed significantly from design predictions; • Of eight multi-functional artificial reefs constructed with the objective of improving surfability, only approximately half of these could be considered to be at least partially successful. <p>An offshore enhanced Rushmeres reef would thus not be expected to guarantee the shore protection required by SFPO, and definitely not for the whole of the frontage. If to be considered, an enhanced reef should rather be in addition to the proposed coastal protection scheme with no express guarantee of significant coastal protection or surfing enhancement.</p> <p>If a single submerged groyne on top of Rushmeres Reef is being proposed, that would not be expected to efficiently retain sand transported from the south and transport to the north would continue, leading to increased beach maintenance and loss of material to the north. A single submerged groyne at this location would not ensure protection of the whole frontage.</p> <p>The engineer's brief has been to design a beach replenishment and coastal protection scheme, and this is what has been undertaken.</p> |

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| | <p>Simon I thought about what you said while we were surfing at Ann Avenue two days ago. While for good reason, your right, I have been picking at the project and haven't provided a solution.</p> <p>I hope this changes things. I am sure you and all the surfers who know this reef and seen how far out the waves can break will support me with regards to how far out the existing reef goes which I believe is further than indicated in the google image.</p> <p>Please forward to Francois Smit the AVISIAN engineer and the SFPO.</p> <p>Simon I have attempted to share this project with the SFPO on numerous occasions but I am imagining they have been too focused on getting the groyne EIA passed and quite frankly they are new to town and possibly had no idea who I was or what my role has been over the years with the beach.</p> <p>It would be great for this concept to have a fair shake by the engineers while the EIA is current and inplace..</p> <p>That has been my objective.</p> <p>This project is a product of participation on an academic level over the full course of the numerous proposed beach projects and EIAs and intimate long standing local knowledge of ocean, beach and wave conditions.</p> <p>Gregory I would like you to formally include all the above text and photographs in the comments for the current EIA regarding constructing a groyne field in st francis bay.</p> | <p>Surfing enhancement would certainly be a bonus if it evolves as part of the groyne scheme, but it was never defined as a design requirement. Groyne placements and orientations were adjusted though to accommodate surfers' inputs.</p> <p>Blacka, M.J., Shand, T.D., Carley, J.T., Mariani, A., 2013. A Review of Artificial Reefs for Coastal Protection in NSW 130. Pilarczyk, K., 2018. Remarks on Coastal Stabilization and Alternative Solutions, in: Handbook of Coastal and Ocean Engineering. WORLD SCIENTIFIC, pp. 743-773. https://doi.org/10.1142/9789813204027_0027</p> <p>The importance of the beach nourishment component of the scheme has been clearly stated in the preliminary design report. The structures assist sand retention. Agreed, the beach nourishment programme is the crucial element for the long-term continued performance of the scheme.</p> |
| <p>Ronald Sams Ronsams1958@icloud.com</p> | <p>Having read the Draft Impact Report, together with attending various meetings in the past on this subject, we congratulate you and your team on an in depth and professional approach to this entire process.</p> | <p>Noted</p> |

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| | <p>We wish to register our full support for this project and believe that it is a matter of urgency that this project goes ahead, with a ecologically sound solution and then a swift execution of the project that the majority of the community does support and rely upon.</p> <p>The SFPO NPC have over time constructed and publically tabled a holistic approach to the challenges facing the St Francis area. The whole area including its residents and the broader economy of the EC and beyond rely on a thriving, safe and ecologically stable St Francis Bay.</p> <p>We are probably unable to attend the virtual meeting scheduled for later this afternoon. Kindly accept our apologies and you can count on our support.</p> <p>Ronald A Sams and Maddy Sams Erf 2079</p> | |
| <p>Stephen Rubidge SRubidge@deneb.co.za</p> | <p>St Francis Bay Coastal Protection Scheme EIA (beach restoration, Spit etc etc)</p> <p>Having perused the report on the CES website and based on previous communications received, we take this opportunity to place on record our appreciation and congratulations to you and your team for the professional approach you have taken with the above.</p> <p>We place on record our full support for this project and believe that it need to proceed without delay.</p> <p>The SFPO NPC have over an extended period of time tabled a holistic and responsible approach to the challenges facing the St Francis area. They have our full support.</p> | <p>Noted</p> |

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| | Due to prior commitments, we are unable to attend the virtual meeting scheduled for 18 February. We hereby tender our apologies and record our support. | |
| Barry Platt barry@energyassist.co.za | <p>I am secretary of the Slipway Surf Crew in St Francis Bay. The members seem to be generally in agreement with the project in terms of surfing.</p> <p>There are some worries about financing though.</p> | <p>Noted</p> <p>The SFPO NPC, being mindful of the total anticipated cost to construct long term coastal protection infrastructure, instructed Advisian to address possible phasing of construction and any cost implications associated with such phasing. The intention of the SFPO NPC is to construct infrastructure as and when funding becomes available.</p> <p>Advisian duly identified possible phasing of the project and the proposed phasing and associated costs are described in their preliminary design report.</p> <p>This phased approach of the SFPO NPC will ensure that construction of infrastructure in any phase will only commence when sufficient funding for that particular phase has been secured, and it will effectively negate the risk of partially constructed infrastructure.</p> <p>SFPO NPC confirmed that more than R12 million has already been set aside for this project, and that the available funds for the project will exceed R20 million by the end of 2021.</p> <p>A number of affluent and influential individuals have approached the SFPO, offering to contribute financially and assist with raising funding for the project. The SFPO will embark on a funding drive as soon as environmental approval is obtained.</p> <p>In addition the St Francis Bay Riparian Home Owners Association, the Kromme Joint River Committee and individual Home Owners Associations and Share Blocks along the Kromme River pledged to contribute financially to the project.</p> |

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| | | The municipality also confirmed that they will contribute and assist in raising funding for the project. The emergency revetment constructed by the municipality will already result in a saving on the project in excess of R5 million. |
| Norman Dyer dyerndd@gmail.com | <p>Re:- Draft Scoping Report for the proposed Coastal protection Scheme, St Francis Bay. Kouga Local municipality, Eastern Cape. DEDEAT Reference number: EC08/C/LN2/M/42-2019.</p> <p>Dear Sirs, Thank you for the minutes of the virtual meeting held on the 18th February,2021.</p> <p>Further to our letter of support for the above project, dated 16 September,2019 we reconfirm our continued full support for the application and granting of the necessary EIA and compliment you on the work done thus far.</p> <p>It is our most sincere wish that the granting of the EIA proceeds without further delays as the state of the St Francis Bay beach, in its entire length as well as the urgent need to be able to move sand from the Kromme River is now a matter of extreme urgency.</p> | Noted |
| Isabeau Plumstead isabeauplumstead@gmail.com | <p>Have you heard that someone suggested that the Ski Canal gets filled in - the idea was with dolosse, but this could be substituted with large flat rocks so that the area looks more natural - a bit like the Wild Side?</p> <p>I am not sure if all the properties (approx. 18) along the ski canal are under threat or only the ones nearest the Kromme River Mouth. Obviously the property owners will not be happy but it is certainly preferable to losing one's entire home at some point. And they will still have a sea view!</p> <p><u>THE BUILDING OF 5 GROYNES ALONG OUR BEAUTIFUL, UNSPOILT COASTLINE!!</u></p> | <p>This option was not considered. Rather the securing of the spit to act as a defence.</p> <p>The infrastructure under threat is that along the full frontage of St Francis Bay from the Main Beach in the south to the Kromme River in the north. This include residential property and municipal property (i.e. car parks, roads). The breach of the spit places many of the properties in the canals at higher risk of flooding and damage.</p> <p>The intention is for the groynes to retain the sediment that is placed on the beach. The main protection mechanism in this instance is the</p> |

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| | <p>I have been a part of the St Francis Bay community since the 1960's and have had a home here since 1971. I, and many other residents have serious misgivings about the building of 5 groynes which may or may not solve the problem satisfactorily. In the Environmental study it clearly states that the groynes will not be able to protect the land in severe storms. Is this not exactly when they will be needed, to stop the serious erosion at this particular point in time? Furthermore, if we consider the global perspective, we are seeing all over the world (right now in Australia), that as a result of global warming, properties, even towns and villages that have been built close to the sea are being washed away. And a one meter rise in sea level is predicted by the end of this century. There is no turning the clock back and one simply can't fight nature!</p> | <p>additional beach created through the nourishment with material from the Kromme Estuary.</p> <p>Sea-level rise has been considered as part of the design process. The scheme accommodates for sea-level rise predicted over the coming 50 years.</p> <p>The current coastal policy for this frontage is to protect the infrastructure. This may change in future. For now this project is in line with that objective set out in the CMP (see Section 4 of the EIR).</p> <p>The visual impact associated with the groynes is covered in Section 7 of the EIR.</p> |
| | <p>I met the Building Contractor Mr Coetzer who built the road on top of the spit as well as groynes at Saldanha and elsewhere along the African coast.</p> <p>He advised the SFPO to forget about the groynes for the following reasons:-</p> <ol style="list-style-type: none"> 1. Groynes are far too expensive. Our small town can simply not afford this massive project and the Municipality and Government will NOT pay for it! Where is your estimated R191 000 000 going to come from if we go the beach nourishment and groyne constructing route? As it is, half of the residents in our town owe money on their rates and taxes and have NO money to spare. We can't even get our basics looked after. Our roads, the Main Beach, toilets and parking lot have been neglected for years. 2. Tourists and holiday makers will find groynes unsightly. This is a known fact! "They constitute a foreign element in the coastal landscape due to their unnatural shape and being perpendicular to the | <ol style="list-style-type: none"> 1. This option has been deemed to be the most feasible to maintain the objective of retaining sediment placed along the frontage. Advisian's updated cost estimate for the complete solution (unphased) is R130 million, and their estimate for a phased solution is R146 million (refer to Advisian's Supplementary Shoreline Report, included in Appendix F of the EIR). The SFPO NPC, being mindful of the total anticipated cost to construct long term coastal protection infrastructure, instructed Advisian to address possible phasing of construction and any cost implications associated with such phasing. The intention of the SFPO NPC is to construct infrastructure as and when funding becomes available. Advisian duly identified possible phasing of the project and the proposed phasing and associated costs are described in their preliminary design report. This phased approach of the SFPO NPC will ensure that construction of infrastructure in any phase will only commence |

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| | <p>shoreline.” This will turn holidaymakers and property buyers and investors away - which is the opposite of what we are trying to achieve!</p> <p>3. Our coastal bed is sandy, there is no rock to build the Groyne foundations on. Consequently there will have to be a massive amount of disruption and destruction of the coastline, the seabed and everything that lives or grows on it.</p> <p>4. The rocks used to build the revetments in front of the beachfront houses came from the Wind Farm when it was being cleared but they have run out. Any new rocks therefore will have to be bought and transported from elsewhere at considerable cost. Probably P.E. (Bear in mind each beachfront home owner had to spend upward of R500 000 for their rock revetments.)</p> <p>5. There will be massive trucks and excavators in and out of the village for years to come. Especially seeing as the plan is to ‘stagger’ the building of the groynes, to wait for enough money for each phase!! The estimated 26 months for this project does not take into account that we would have to stagger the building of the groynes to bring in money. This project if it ever gets off the ground will drag on for years, if not decades, and our little town will look and sound like a massive construction site! Not attractive for holiday makers or investors!</p> <p>6. According to Mr Coetzer, each of the FIVE groynes will have to be approx. 35 meters across at the base under water. This then narrows and the top of each groyne is approx. 6 meters across. Tons and tons of rocks depending on how deep and how long each stub groyne is, will be dropped into the sea. (Your estimate</p> | <p>when sufficient funding for that particular phase has been secured, and it will effectively negate the risk of partially constructed infrastructure.</p> <p>SFPO NPC confirmed that more than R12 million has already been set aside for this project, and that the available funds for the project will exceed R20 million by the end of 2021.</p> <p>A number of affluent and influential individuals have approached the SFPO, offering to contribute financially and assist with raising funding for the project. The SFPO will embark on a funding drive as soon as environmental approval is obtained.</p> <p>In addition the St Francis Bay Riparian Home Owners Association, the Kromme Joint River Committee and individual Home Owners Associations and Share Blocks along the Kromme River pledged to contribute financially to the project.</p> <p>The municipality also confirmed that they will contribute and assist in raising funding for the project. The emergency revetment constructed by the municipality will already result in a saving on the project in excess of R5 million.</p> <p>2. The EIR considers the addition of the beach amenity as part of the scheme to be beneficial to tourism (Section 7 of the EIR). Under the no-go scenario there will be eventual removal of spit and undermining of revetments along the rest of the shoreline. Historical analysis of shoreline movement indicates the spit retreat and undermined revetments this is likely to continue to occur.</p> <p>3. The groynes will be founded on sand and the structure will be designed with appropriate allowance for settling and erosion/scour protection as is standard practice (for example a falling apron design for the toe). No anchoring to bedrock foreseen. Geotechnical conditions will be fully taken into account during detailed design.</p> |

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| | <p>is 41 550m cubed) (Your proposed groynes might be designed differently but the impact will be the same)</p> <p>7. This is NOT the end. The groynes need constant nourishment especially at the heads as these erode and can collapse, which is extremely dangerous!</p> <p>In other words, this massive ‘groyne intervention’ will deface our beautiful St Francis Bay coastline, chase away holiday makers, property buyers, investors and cost us a fortune and we will have to keep on paying forever! And at the end of the day, it may not even have the desired effect of protecting a dozen or so houses near the spit.</p> <p>Furthermore, if you read up about the adverse effects of artificial groynes you will see they are directly responsible for many other disastrous consequences, besides the ones Mr Coetzer mentioned. (See my research on Groynes further down.)</p> <p>I have also included the details of Internet sites below so you can do your own research!</p> <ol style="list-style-type: none"> 1) http://www.coastalguidebooks.net.au Pg. 80 Under the heading Brighton Beach to Beaumaris 2) Case study Box 15.3 Managing Cliff erosion, Sandringham Beach, Malbourne, Australia 3) 10.co.za/news/cape_beaches_sinking_into-the-sea_1548356 4) Coastalwiki.org/wiki/dealing_with_coastal_erosion 5) Coastalwiki.org/wiki/Groynes_as_shore_protection <p>(Both Coastalwiki articles are by Job Dronkers)</p> <p><u>My Summary on Groynes as it pertains to us here in St Francis!</u></p> | <ol style="list-style-type: none"> 4. Impacts to the coastal environment have been described in Section 7 of the EIR. 5. Available rock gradings were confirmed with a local quarry (in Humansdorp) and the armour design was aligned to ensure that rock from local sources could be used. 6. The anticipated construction time frames for the groynes and the dredging of the Kromme are detailed in Section 2 of the EIR. The timeframes include both phased and full development alternatives. Each phase is seen as a discreet project and therefore, it is likely that machinery would be mobilised and demobilised accordingly. 7. The dimensions of the groynes are included in Section 2 of the EIR with the associated impacts detailed in Section 7.2 of the EIR. More detailed dimensions are shown in the engineering reports included in Appendix F of the EIR. 8. The structures have been designed to withstand the environment to which they will be exposed. Appendix F contains the engineering reports which characterise the environment and describe the engineering solutions. The adverse effects of the groynes have been considered and designed out as far as possible through the orientation and extent (length, width, height). <p>Yes, this is correct. The marine environment is described in Section 6.7 of the EIR. Further detail on the marine environment can be found in the engineering reports (Appendix F of the EIR).</p> |

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| | <p>Depending on the direction of the wind, currents, waves and the lie of the land, beaches are affected by various factors when artificial groynes are built.</p> <p><u>The Groynes have the following negative impact on the coastline they are built on</u></p> <ol style="list-style-type: none"> 1. Where groynes are built in an attempt to stop beaches disappearing, certain things will occur. If the predominant drift of sand is to the north in the summer and to the south in winter, due to the prevailing direction of wind-driven waves, the sand will build up on the south side of the groyne during the summer and the north side during the winter. And if the groyne stops sand from departing from ONE beach, it means the sand does not move to the next beach so the problem never goes away, it is just transferred. 2. Besides the massive expense in building the groynes, which need to be replenished constantly, our unspoilt coastline will be permanently 'under construction'. This 'massive construction site' will be ugly and dangerous and will certainly turn holiday makers and property buyers away. 3. The groynes are apparently going to be built right to the back of the beach and will obstruct passage along the beach - again making it a 'no go' zone for beach goers. 4. I disagree with the Impact Scale that is being used in the Environmental Study. The health and safety issue is not even mentioned on the scale but are mentioned separately. The Health and Safety of any community and their holiday makers is critical to any seaside resort. Groynes trap floating debris and seaweed on the updrift side as well as the lee side of the groyne which results in poor quality, unhealthy, water. (Our beach is full of litter from boats which my husband and I pick up when we walk our dog early in the morning. Can you imagine if this collects for months on end!) | <ol style="list-style-type: none"> 1. The dominant movement of sand within St Francis Bay is from south to north. While there may be some movement in a reverse direction this has not been observed as being significant. Therefore, the scheme has been designed to keep sediment on the beach under the prevailing conditions (i.e. south to north) while also allowing sand to pass through the system. Approximately 8 000m³ – 50 000m³ of sediment are likely to pass through the scheme annually (dependent of the phase). 2. The anticipated construction time frames for the groynes and the dredging of the Kromme are detailed in Section 2 of the EIR. The timeframes include both phased and full development alternatives. Each phase is seen as a discreet project and therefore, it is likely that machinery would be mobilised and de-mobilised accordingly. 3. The design of the nourishment scheme is to ensure that there is an ability to walk along the back of the beach with no obstruction. 4. The groynes do not obstruct the wave action in a significant way as would be the case for say offshore breakwaters. The water quality is therefore unlikely to stagnate since there will be constant flushing through tidal and wave action. <p>The accumulation of debris may occur but this is not as a result of the construction of the project but rather the existing environment.</p> <ol style="list-style-type: none"> 5. It has been identified that under certain conditions rip currents associated with the groynes could occur. Rip currents can of course also occur on open beaches and for other coastal structures such as the eddies often associated with offshore breakwaters. This often leads to a false sense of security as a result of perceived wave protection (calm |

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| | <p>5. As for the Safety issue - Swimming can be very dangerous in the lee zone as result of the updrift rip current. (In other words, because of the wave deflection an eddy is generated with an outward-direct current on the lee side and this current will suck swimmers out to sea.) The offshore sand loss and local seabed erosion caused by the groynes is also dangerous for swimmers. Our family lived in Durban for 30 years and my son regularly body boarded at North Pier. I have seen first hand how dangerous these rips can be. My son's 24 year old friend drowned 2 years ago after being sucked out in that rip.</p> <p>6. And as previously mentioned if the groynes aren't reinforced it can be extremely hazardous for swimmers and surfers. With 5 groynes to keep monitoring and maintaining this will be a never ending job and a money guzzler.</p> <p>7. There is mention of the employment opportunities this construction will offer. We certainly do not need a massive influx of people looking for jobs on this project! We already have a great number of house break ins and robberies. (In the first 6 months of this year I have had two laptops and a watch stolen and on another occasion my car was broken into.) We also have a massive housing shortage in China Town, even for the local population. Where are the new recruits going to live??</p> | <p>conditions behind the breakwater), can lead to risky swimmer behaviour and people being caught in the rip. The EMPr suggests the inclusion of appropriate warning signage and safety precautions.</p> <p>6. Monitoring and maintenance are requirements for any structure. The engineer's brief includes for detailing and optimizing the design with a focus on minimizing capital and maintenance costs during the detailed design stage.</p> <p>7. Where possible contractors will be using local resources and skills. There is no extensive manual labour anticipated and therefore the project is unlikely to attract those outside of the St Francis Bay area. It is foreseen that the project will result in employment opportunities being created in the tourism industry and generally as a result of local economy growth. The creation of such job opportunities is regarded to be beneficial.</p> |
| | <p>Negative impact on the Kromme River That is just half of the story. The most suitable sand to use for the 'Beach and Groyne' project, not surprisingly, is available along the Kromme River. We walk there regularly and it is home to masses of different bird species such as the Giant, Brown Hooded and Malachite Kingfisher, Herons, Spoonbills, Ibis, Cormorants, Terns, Seagulls, Flamingos, Oystercatchers. The vegetation is also abundant and - some is very rare.</p> | <p>The ecological environment has been described in Section 6 of the EIR. Sensitive habitats and species have been identified and the areas in which they occur identified and mapped. The priority and secondary areas identified for material have been designed to avoid sensitive areas. These areas are indicated on Figure 2.5 of the EIR.</p> <p>In addition, development zones have been identified in Figure 9.2 of the EIR specifically to guide the project on areas to avoid.</p> |

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| | <p>If these five groynes are built, one after another, as the money becomes available, one can only imagine what the constant tracking of enormous lorries and dredgers across the sand to dig up tons and tons of riversand will do to the future of this pristine, wetland and its inhabitants! Not to mention the homeowners on the river plots.</p> <p>Solution? There are many places grappling with similar problems and even once a solution has supposedly been 'found' unforeseen problems occur. In Durban the Pier near Ushaka needs to be extended because 'the solution' has caused other unexpected problems in its wake! A lot of residents are angry, asking where the massive amount of money will come from. We have interfered with nature here in St Francis Bay and now we are having to face the consequences. No dunes to replenish the beaches, man made canals without enough protection from the river or the sea. Many attempts have been made to stem the tide, a great deal of money has already been spent, but to no avail.</p> <p>If one looks at the Wild Side with its massive waves maybe we can try to imitate the coastline there, in a smaller, more modest way by transporting very big, natural rocks and building a natural looking rock wall in front of the spit and at other points where the sea is a serious threat? At least this will look natural and will not be as costly. We will not be interfering nearly as much with nature and the rocks will hopefully perform the same function as they do on the Wild Side.</p> | <p>It is unlikely that trucks will travel across the sand banks within the estuary.</p> <p>Dredgers will also not traverse the sand banks. They will move along the river channel, and dredging will take place by widening the existing river channel.</p> <p>Identifying, excavating, moving and placing natural rock material would be exorbitantly expensive. The construction of a natural rock environment along the frontage would result in significantly more cost compared to what is being proposed. The impact on the road network of St Francis Bay will also be much worse. In addition, the beach amenity would not be restored naturally due to the lack of sediment entering the bay. .</p> |
| | <p>I have read through the amended Proposal with dismay. As you already have my detailed arguments wrt this Proposal I will try to be brief.</p> | <p>The scheme has been designed with existing and future conditions in mind. Much research, data collection and modelling has been employed to develop this scheme which aims to meet the objective of protecting the coast while also aiming to keep the costs as low as possible.</p> |

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| | <p>As you know, a very serious new development has occurred across the globe, not only in St Francis, which has left most people much poorer and more vulnerable, economically. Many residents in St Francis have lost jobs, money on Investments and even their businesses to the onslaught of the Coronavirus. We certainly do not want to be forced to pay higher rates and taxes on this new 'gamble'!</p> <p>In fact we have had a number of suicides as a result of the devastating financial impact of this killer disease on certain residents and business owners. And it is far from over at this time. NO ONE, wants to BE FORCED to sink thousands of rands into this half baked 'Beach Nourishment and Groyne Proposal'!! And this is NOT a criticism of your work! You and your team have been meticulous - and given the options open to you, have probably given the Municipality and SFPO the least destructive proposal. But that still does not make it viable or economically affordable and I also believe that you have made certain decisions based on a false premise.</p> <p>As you know I have been here since the mid 60's and I have seen how our interference with nature has had a devastating impact on the beaches, river mouth and dunes around us. More recently my husband and I have watched with interest, on a daily basis, how all the efforts to pump sand, deposit rocks, rebuild the spit and dunes have simply been swept aside by the immense, unrelenting force of the sea. Not only that, but each attempt to halt the sea in one area results in a 'counter attack' somewhere else! Put sand bags or rocks in one area and the sea simply eats out the next unprotected section. Place a dune or spit in one place and the mouth of the river simply shifts elsewhere!</p> | |

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| | <p>One simply can NOT fight nature. The sea WILL continue to eat into the land ALL OVER THE WORLD as climate change, the melting of the ice caps, increased pollution and the burning of the rain forests continue. Many coastal cities around the world have had to be evacuated as the sea encroaches. In South Africa, homes and restaurants in Ballito, Clifton, Muizenberg and Hout Bay have been flooded. There is no going back! If certain people want to try and save homes built too close to the sea PLEASE do not expect the entire little village to throw good money after bad. We have been down that road MANY times before!!</p> | |
| | <p>FALSE PREMISE I mentioned this in my last letter but let me repeat. Groynes that are an eye sore along our pristine coast line; that block access and bar beach goers from walking along the beaches; that prevent our holiday makers and home owners from swimming SAFELY on the little beaches will NOT promote tourism, will NOT attract new residents or investors or provide water for recreational purposes. It has been proven elsewhere that man made groynes stretching out to sea are considered an eye sore! Even more concerning is that they do NOT provide a safe, quality beachfront at all! The groynes cause rip tides that will sweep people out to sea or underneath the groynes, the water will be UNHEALTHY because the debris which gets washed in from the sea (and we have a lot of it!) is trapped between the groynes. Finally unless there is constant maintenance and repair work done to the groyne heads, they will become unstable and a danger to swimmers!</p> | <p>Point noted. These have been addressed above.</p> <p>The meeting minutes were distributed to all IAPs. See Appendix B for further information.</p> <p>Advisian's updated cost estimate for the complete solution (unphased) is R130 million, and their estimate for a phased solution is R146 million (refer to Advisian's Supplementary Shoreline Report, included in Appendix F of the EIR). As stated above monitoring and maintenance are requirements for any structure. The engineer's brief includes for detailing and optimizing the design with a focus on minimizing capital and maintenance costs during the detailed design stage.</p> <p>The SFPO NPC, being mindful of the total anticipated cost to construct long term coastal protection infrastructure, instructed Advisian to address possible phasing of construction and any cost implications associated with such phasing. The intention of the SFPO NPC is to construct infrastructure as and when funding becomes available.</p> <p>Advisian duly identified possible phasing of the project and the proposed phasing and associated costs are described in their preliminary design report.</p> <p>This phased approach of the SFPO NPC will ensure that construction of infrastructure in any phase will only commence when sufficient funding</p> |

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| | <p>The only people who want these groynes are those who did not think carefully when they built their homes on risky plots near the water. We have so many options of where to swim in St Francis and Cape St Francis - we do not have to spend millions on carting 854 000m(3) of sand to the beaches and damaging the river in the process. We also do not need to spend millions/billions on carting 44 300m (3) of rocks to build unsightly groynes along our beach front. And this operation will take DECADES to complete because we will only build IF AND WHEN we have enough funds??? And then we will need to maintain all of these new structures and beaches until kingdom come???</p> <p>WHO is going to pay for this? Do you think, if new buyers decide they can live with the noise and the unsightly groynes, that they will want to be trapped into maintaining these groynes forever? They will go to Plett or Keurbooms or Bushmans rather!</p> <p>If this ill conceived scheme goes ahead this lovely little town will become a noisy, dirty, ugly construction site with 100s of trucks (30 to 40 a day!!), masses of bulldozers and tractors rumbling around 5 days a week for years to come and WE are expected to PAY for this pleasure?</p> <p>As it is the SFPO are not getting in the donations and sponsorships they told us they had secured. And Kouga Municipality is apparently in a mess, so don't rely on any support there.</p> <p>Quite frankly I am so tired of all the trite, politically correct words that get trotted out to get support, such as - this is an opportunity for economic growth, tourism, social development and job creation.</p> <p>South Africans have never been poorer, more vulnerable and less positive about the future. We are struggling just to survive and might not even own our properties soon.</p> | <p>for that particular phase has been secured, and it will effectively negate the risk of partially constructed infrastructure.</p> <p>SFPO NPC confirmed that more than R12 million has already been set aside for this project, and that the available funds for the project will exceed R20 million by the end of 2021.</p> <p>A number of affluent and influential individuals have approached the SFPO, offering to contribute financially and assist with raising funding for the project. The SFPO will embark on a funding drive as soon as environmental approval is obtained.</p> <p>In addition, the St Francis Bay Riparian Home Owners Association, the Kromme Joint River Committee and individual Home Owners Associations and Share Blocks along the Kromme River pledged to contribute financially to the project.</p> <p>The municipality also confirmed that they will contribute and assist in raising funding for the project. The emergency revetment constructed by the municipality will already result in a saving on the project in excess of R5 million.</p> <p>With regard to truck traffic, it is covered in Section 7 of the EIR. In all construction cases the duration of the activity where trucks are required is considered temporary. The EMPr also provides recommendations to ensure that disturbance by trucks is kept to a minimum.</p> |

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| | <p>This is not the time for hairbrained, desperate Coastal Protection Schemes. Many people would rather leave than risk unnecessary money on this.</p> <p>Please can you tell me where I will find out what was discussed and decided during the video conference wrt the Coastal Protection Scheme?.</p> <p>We and three other vehicles were stuck behind a truck bringing a load of rocks to St Francis Bay yesterday. It was crawling along the road leading to St Francis at 50kms per hour. Can you imagine 30 to 40 trucks per day on the road? And that is just for the rocks!! Some idiot behind us overtook 3 cars PLUS the truck and nearly had a head on collision with a truck coming from the opposite direction! That is only one small taste of what our lives will be like, living here in the future.</p> <p>And for what purpose? In my opinion, the sea WILL continue to rise each year and within a few decades all this money that we are going to have to fork out and all these attempts to 'stem the tide' will be fruitless anyway.</p> | |
| <p>Department of Economic Development, Environmental Affairs and Tourism. Nicole.Gerber@dedea.gov.za></p> | <p>APPLICATION FOR AUTHORISATION IN TERMS OF SECTION 24 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, ACT 107 OF 1998 TO UNDERTAKE A LISTED ACTIVITY AS SCHEDULED IN THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014, AS AMENDED: PROPOSED COASTAL PROTECTION SCHEME, ST FRANCIS BAY, WITHIN THE KOUGA MUNICIPAL AREA.</p> <p>The following documents refer: 1. The Draft Environmental Impact Assessment Report (DEIR) as well as the Draft Estuarine Report, Draft Sand Sourcing Study and Draft EMPr, with accompanying cover letter, dated 05 February 2021 and received via electronic file transfer on 10 February 2021 for the above project;</p> | <p>Noted.</p> |

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| | 2. The PowerPoint presentation received electronically on 18 February 2021; | Noted. |
| | 3. The Department's acknowledgement of receipt of the DEIR dated 02 March 2021 which indicated that the Department's timeframe for issuing a comment letter on the DEIR is before the end of day on 12 March 2021; and | Noted. |
| | 4. The minutes of the virtual public meeting held on 18 February 2021, received electronically on 04 March 2021 | Noted. |
| | The Department has reviewed the DEIR and the above documents and hereby provides the following comments: | |
| | a. The DEIR fulfils the requirements as set out in Appendix 3 of the 2014 EIA Regulations as amended. | Noted |
| | b. The presentation and associated minutes of the virtual meeting are noted. It is trusted that these comments will be captured and inform any responses which may be included in the FEIR. | These have been incorporated into the Final EIR. |
| | c. It is noted that certain maps/diagrams, as well as copies of PPP correspondences, and copies of EAP/Specialist declarations are not clear in the electronic document, even at higher zoom in levels. Please ensure that all documents are clearly legible in the FEIR | Noted. This has been amended for the Final EIR. |
| | d. Furthermore, the Department notes the specialist studies included in the DEIR consist of the following: i. Advisian Design Report, including the Estuary Hydrodynamic Modelling Study, Supplementary Shoreline Modelling Report which addresses the effects on the northern bank and beaches, Preliminary Design Report, and Spit Protection Preliminary Design Report; ii. Exigo Archaeological Specialist Report; iii. Sand Sourcing Specialist Report; and iv. Estuarine and Dune Ecology Specialist Report | Noted. |

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| | <p>e. The Draft EMPr does not sufficiently address the issue of post-construction maintenance of the beaches in terms of continuous nourishment, as well as the maintenance of the groyne structures and spit revetments. A detailed maintenance management plan, with associated method statements and time periods required for works, must be included in the EMPr that is in accordance with the requirements for such maintenance management plans, as outlined in the EIA Regulations.</p> | <p>This has been updated and included in the Final EMPr.</p> |
| | <p>The Department trusts that the above will be addressed accordingly, and does however, reserve the right to request further information should such be required on submission of the FEIR. The EAP is to remind the applicant in writing that the activity may not commence prior to an environmental authorisation being granted by the competent authority.</p> | <p>Noted.</p> |
| <p>Department of Environment, Forestry and Fisheries. Oceans and Coasts OCEIA@environment.gov.za</p> | <p>SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED COASTAL PROTECTION SCHEME, ST FRANCIS BAY, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE</p> <p>The Oceans & Coast (O&C) Branch of the Department of Environment, Forestry and Fisheries (DEFF) has reviewed the Draft Environmental Impact Report for the proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), (“NEMA”) and has provided inputs based on coastal considerations and objectives in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICM Act”).</p> | <p>Noted.</p> |

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| | <p>The Environmental Assessment Practitioner (EAP) must take note that the Branch O&C has a mandate to protect the ecological integrity, natural character and the economic, social and aesthetic value of the coastal zone; as well as to protect people, property and economic activities from risks arising from dynamic coastal processes. It further ensures that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable. The EAP is reminded that comments and recommendations as provided below are intended to ensure the achievement of the aims and objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases</p> | <p>Noted.</p> |
| | <p>It is common cause that approximately 2.4 billion people are living within 100kms of the coast 1 and this has had resultant effects on dune morphology (Cock and Burkinshaw 1985; Giambastiani et al. 2016). The St Francis dune morphology has been studied by several scientists. Since the early 60s, poorly planned development has been blamed as amongst chief factors that has disrupted the natural functioning of the dune field (Cock and Burkinshaw 1985). The coastline of St Francis is known as the active headland bypass dune field (Cock and Burkinshaw 1985) or in other words, mobile dune field. The understanding of the parasequence (transgression or regression) is also important for this project.</p> | <p>Noted.</p> <p>The engineering studies in Appendix F provide a description of the baseline physical conditions. These descriptions include an indication of the sediment being transported along the frontage. There is recognition that the stabilisation of the dune field has resulted in less material available for movement along the shore.</p> |

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| | <p>The down drift effects can not altogether be avoided. Long shore currents will generally transport the sand along the coast and that result in erosion or accretion somewhere in the beach. The consideration of coastal modelling to consider the possible erosion of the shoreline after installation of groynes is a welcome move. As it has shown, the installation of groynes will result to erosion in the northern beach. It is however not clear what impact this protection scheme will have in terms of accretion in consideration of the strong winds experienced in this portion of the coastline (Cock and Burkinshaw 1985). Beach nourishment is expensive and thus requires systematic maintenance interventions which are ongoing maintenance to provide for long term solution against erosion thus need a well-functioning and resourced organisation to perform the sand nourishment.</p> | <p>The modelling does not show any erosion to the northern beaches as a result of the installation of the groynes.</p> <p>Windblown sand is not expected to be any more significant than that experienced during periods where the beach at St Francis Bay was better established. The distance between the groynes will be relatively short reducing the ability to the wind to transport the material.</p> <p>The SFPO NPC confirmed that more than R12 million has already been set aside for this project, and that the available funds for the project will exceed R20 million by the end of 2021.</p> <p>A number of affluent and influential individuals have approached the SFPO, offering to contribute financially and assist with raising funding for the project. The SFPO will embark on a funding drive as soon as environmental approval is obtained.</p> <p>In addition, the St Francis Bay Riparian Home Owners Association, the Kromme Joint River Committee and individual Home Owners Associations and Share Blocks along the Kromme River pledged to contribute financially to the project.</p> <p>The municipality also confirmed that they will contribute and assist in raising funding for the project. The emergency revetment constructed by the municipality will already result in a saving on the project in excess of R5 million.</p> |

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| | <p>It is recommended that the following sections of the ICM Act should be given due consideration): 5. Section 13 of the ICM Act: Access to coastal public property 5.1 Taking into account that the proposed Coastal Protection Scheme in St Francis Bay will be constructed within the Coastal Public Property (CPP) and its associated activities to be undertaken within the Coastal Protection zone, Kromme estuary mouth and functional zone. We recommend that coastal access to the general public should not be restricted nor prohibited as 1 United Nations, https://www.un.org/sustainabledevelopment/wp-content/uploads/2017/05/Ocean-fact-sheetpackage.pdf (accessed on 17 March 2021). A result of the implementation of the proposed protection structure except only during construction phase. Therefore, should the competent authority decide to grant this proposed project, we recommend that the CA must ensure that they include a condition within the EA that will ensure that public access will not be affected.</p> | <p>Noted.</p> <p>Public access will only be restricted temporarily during the construction phases to ensure public safety. The EMPr includes mitigation to cease activity during peak holiday season.</p> |
| | <p>6. Section 14 of the ICM Act: Position of high-water mark 6.1 The applicant is advised to bear in mind that the coast is dynamic and characterized by natural processes, such as floods, sea-level rise, current change, wind speed, accretion, erosion, and storm sedges etc. It is the same coastal dynamic processes that necessitated this project. Therefore, the design plan of the proposed St Francis Bay Coastal Protection Scheme will need to consider the effects of climate change.</p> | <p>Noted. The scheme has been designed to accommodate for those natural physical processes mentioned. This includes designing with climate change and particularly sea-level rise in mind.</p> |
| | <p>6.2 Before the Environmental Authorisation can be issued, the Competent Authority must ensure that the design plan has taken into account all the natural processes currently being experienced in the proposed site when determining the location where structures will be placed, the methodology to be applied, technology to be used and lifespan of the protection structure. The design must also address concerns on how the proposed protection scheme will affect and be affected by the identified natural process and climate change during all phases of this proposed project.</p> | <p>Appendix F of the EIR contains the engineer's reports describing the existing natural conditions, the design parameters to meet the coastal protection objective and the resultant beach level and alignment during "operation" of the scheme. This extends to recommendations of annual maintenance nourishment of the beach which has been determined by modelling the effect of the scheme under the physical processes in St Francis Bay.</p> |

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| | <p>7. Section 15 of the ICM Act: Measures affecting erosion and accretion</p> <p>7.1 The construction and maintenance of the proposed St Francis Bay Coastal Protection Scheme will remain responsibilities the applicant. Should the area experience any natural/un-natural disasters, and as a result of damage to the proposed protection scheme, where debris is washed up to the coast and sea, the applicant will be held liable for the clean-up and rehabilitation of the affected area. Additionally, should any member of the public suffer injuries from the proposed protection structure, as a result of negligent by the applicant, the applicant will be held liable</p> | <p>Noted.</p> <p>Once constructed appropriate signage and warnings will be erected to ensure the public remain safe.</p> |
| | <p>8. Section 63 of the ICM Act: Environmental authorisations for coastal activities</p> <p>8.1 Considering what the CA must take into account in terms of Section 63 of the ICM Act we recommend before an EA is granted, the CA must ensure that sufficient measures to avoid, manage, minimize and mitigate potential adverse impacts in the coastal zone have been identified, addressed and mitigation measures are provided adequately within the Environmental Management Programme report (EMPr), or Maintenance Management Plan (MMP) or EA conditions;</p> | <p>Noted.</p> |
| | <p>8.2 Additionally, the CA should consider the following but not limited to: • proposed project associated construction, operational and maintenance activities; • project potential Impacts on purpose, objective, goals and function of: ☐ Coastal Public Property (CPP) ☐ Coastal Protection Zone ☐ Economic Exclusive Zone ☐ the littoral active zone ☐ sea ☐ Kromme Estuary ☐ Proposed and existing setback line and management lines</p> | |
| | <p>8.3 Authenticate if the area falls within a Critical Biodiversity Area, Ecological Support Area, and the potential of causing adverse impact to vulnerable species and ecosystems, threatening them to be endangered or extinct.</p> | <p>The EIR presents the scheme in relation to CBA and other sensitive habitats and ecosystems. See Section 6.4, 6.5 and 6.6 of the EIR.</p> |

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| | <p>9. Coastal Water Discharge (CDW) At this moment it cannot be confirmed whether a Coastal Waters Discharge Permit (“CWDP”) in terms of section 69 of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (the “ICM Act”) will be required or not for the discharge of effluent into the coastal zone. Therefore, to ensure adherence and implementation of Section 69 of the ICM Act the applicant is advised to consult this department DEFF: Branch O&C for further engagement on requirements and process to follow, ypeterson@environment.gov.za</p> | <p>Email confirmation received from OCEIA (29th March 2021)</p> <p>Good afternoon Greg</p> <p>Hope you well. I remember discussing the initial phases of this project in my old portfolio, I see there is a progress.</p> <p>I’ve gone through the report and comments provided by the Department as promised earlier. I’ve checked the impact assessment for the proposed developmental phase and project alternative. I can confirm that there is no foreseeable need for Coastal Water Discharge Permit for the preferred alternatives as you will not be discharging any effluent.</p> <p>My understanding is that the main activities for the preferred alternative will be as follows:</p> <ol style="list-style-type: none"> 1) the Sand sourcing from the Kromme Estuary focussing on priority areas and secondary areas as required; 2) Beach nourishment along the full frontage, likely to be developed in phases; and 3) Construction of stub groynes as proposed that retain the nourished sediment but also facilitate the long shore sediment movement to ensure that the coast to the north of the scheme still receives sediment supply. <p>Therefore, there will be no need for CWDP.</p> <p>I will assume in terms of the ORV Regs under ICMA that you will need the ORV permit or can be a Permissible Use if the Municipality is performing the activities, as I noticed that you doing this on their behalf. Kindly liaise with Mr Sibusiso Mbethe regarding that, I’ve cc’d him in this email.</p> <p>Keep well.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>10. Dumping at Sea (DaS) requirement 10.1 To ensure adherence and implementation of Section 70,71,72 and 73 of the ICM Act. the applicant must consult this department DEFF: Branch O&C contact for further engagement on requirements and process to follow to obtain a CDW permit ypeterson@environment.gov.za/ dutoit@environment.gov.za.</p> | <p>Regards, Email received from OCEIA (23rd March 2021)</p> <p>Good afternoon Greg</p> <p>Your email below refers.</p> <p>The proposed activities will not require a Dumping at Sea permit according to the criteria in Section 71 of the ICM Act, as the rock used to construct the groyne is not being disposed as waste.</p> <p>Please note that should new information come to light, or the project description change, we reserve the right to change our stance.</p> <p>Kind regards</p> |
| | <p>11. For the attention of the EAP and CA: 11.1 The applicant must take into account, adhere to and implement the relevant section of the National “ICM Act” applicable to this project</p> | <p>Noted.</p> |
| | <p>11.2 We recommend that only work necessary must be undertaken within the CPP. Furthermore, clearing of dune vegetation for sourcing sand and undertaking construction operation and maintenance activities should be scheduled where it’s only necessary to avoid loss of vegetation and retain as much vegetation as possible so that the area can continue to function and offer services in the best sustainable way as possible</p> | <p>Noted.</p> <p>A description of the dune vegetation, the impacts anticipated and mitigation measures is included in the Estuarine and Dune Ecology specialist report (Appendix J of the EIR). The findings are also summarised in the EIR with the mitigation measures appearing in the EMPr.</p> |
| | <p>11.3 The sourcing of sand from the Kromme estuary must be only for the approved volume needed. A strict monitoring plan must be developed to ensure that the estuary is not left vulnerable, and unable to function as a result of this proposed activity. Additionally, only the required volume of sediment should be approved to be dredged</p> | <p>The recommendation of the EAP is that a Management Plan be developed prior to the construction commencing. This will need to be developed once a contractor has been appointed and the specific methodology confirmed.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>11.4 No construction activities with the potential to affect the general public to enjoy the coast should be scheduled and take place during peak season;</p> | <p>Noted.</p> <p>Public access will only be restricted temporarily during the construction phases to ensure public safety. The EMPr includes mitigation to cease activity during peak holiday season.</p> |
| | <p>11.5 To ensure that pollution in the marine ecosystem and seawater contamination is minimized, we recommend that the construction period should be scheduled to avoiding heavy rain and stormy season. Historical data must be used for best period allocation;</p> | <p>Noted.</p> <p>The plant used for the dredging will be designed to work in marine/aquatic environments and are unlikely to increase the risk of pollution during rainfall and/or storms.</p> <p>For the groyne construction it is likely that some storm conditions will limit work. However, it should be noted that plant may need to work during these events to prevent loss of material and infrastructure as a result.</p> |
| | <p>11.6 When planning for construction, operational and maintenance phases, the plan and designs should identify and avoid at all cost, sensitive areas that offer important functions, such as dunes that offer natural coastal protection and removal and disturbance of salt marsh habitat, areas where bird species may nest, breeding areas and migration (route and seasons) to indigenous species and areas where natural resources that are considered of important status occur;</p> | <p>Noted.</p> <p>Section 9.7 of the EIR clearly identified those areas where work can be carried out and those areas to avoid. This is based on the sensitivity of the species and habitats identified through the specialist investigations and recommendations. The ECO will be required to monitor the compliance of the contractor in this regard.</p> |
| | <p>11.7 Vehicles and machinery have the potential of releasing fuel and oil emissions while in operation. It is our view that the concentrations will be low if vehicles and machinery that will be used are maintained well and inspected regularly by the building contractor. Therefore, we recommend that the driving of Vehicles and machinery within the coastal zone must be carried out in a manner that will not result in causing adverse impacts. Also, no vehicles and machinery should be scheduled to be refueled within the coastal zone. Furthermore, we recommend for this condition to be included in the final MMP;</p> | <p>Noted.</p> <p>The re-fueling of construction plant, including vehicles, needs to take place in a suitable location and with the required measures in place to avoid spillages. This is included in the EMPr and will be included in the MMP.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>11.8 We concur with the proposed appointment of the Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are taken into account, adhered and implemented. The CEO will also be responsible for undertaking site inspections to ensure compliance with the EA conditions to ensure that the marine ecosystem will be protected and conserved during construction and maintenance phases throughout all phases of this proposed project. Furthermore, the CEO must ensure that employees are aware of the procedure to be followed, and ensures that necessary materials and equipment are available for dealing with spills and leaks;</p> | <p>Noted.</p> |
| | <p>11.9 You are kindly reminded of your duty of care towards the coastal environment in accordance with section 58 of the ICM Act read together with section 28 of NEMA which states that “Every person who causes, has caused or may cause an adverse effect on the coastal environment must take reasonable measures to prevent such adverse effect from continuing, recurring or occurring or, in so far as such harm to the coastal environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such adverse effect on the coastal environment” by taking into consideration and implement recommendations provided in this comments document recommending measures to be undertaken to ensure the coastal zone is protected, preserved and managed;</p> | <p>Noted.</p> |
| | <p>11.10 Kindly note that the activity may not commence prior to an environmental authorisation being granted by the CA. It is an offence in terms of section 49A “NEMA” for a person to commence with a listed activity unless the CA has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding 10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment;</p> | <p>Noted.</p> |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>11.11 Please be advised that the Sub Directorate: Coastal Development and Protection within the Branch: O&C is responsible for coordinating and facilitating EIA comments and advice for developments within the marine environment. Kindly forward request of EIA Comments to, Email: OCeia@environment.gov.za.</p> | Noted. |
| | <p>NB: With the above-mentioned recommendations and conditions, the Branch: O&C has no objections to the Proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape, and recommends for the implementation of Beach Nourishment and Short Stub Groynes (Option 1B) which include: sand material sourced from the Kromme River; beach nourishment of St Francis Bay beach; and</p> <ul style="list-style-type: none"> • the development of coastal structures to retard the erosion of St Francis Bay beach and to project the beach spit. | Noted. |
| | <p>These comments must be sent to the CA for consideration and implementation, and the EAP is kindly requested to submit proof of such submission to us.</p> <p>Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>Yours Sincerely</p> | Noted. |
| <p>OCEIA@environment.gov.za +27 218192499</p> | <p>Dear Mr. Shaw</p> <p>Kindly find attached comments for your perusal and implementation on the Draft Environmental Impact Report for the proposed Coastal Protection Scheme, St Francis Bay, Kouga Local Municipality, Eastern Cape. Apologies for sending them late, and the inconvenience caused.</p> | Noted. |

| I&AP DETAILS | COMMENT | EAP RESPONSE (FEIR) |
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| | <p>Kindly note that all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be submitted to our office or via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>Kind Regards Oceans and Coasts EIA</p> | |
| <p>Jessica du Toit JeDutoit@environment.gov.za</p> | <p>Good afternoon Greg</p> <p>Your email below refers.</p> <p>The proposed activities will not require a Dumping at Sea permit according to the criteria in Section 71 of the ICM Act, as the rock used to construct the groynes is not being disposed as waste.</p> <p>Please note that should new information come to light, or the project description change, we reserve the right to change our stance.</p> <p>Kind regards Jessica</p> | <p>Noted.</p> |
| <p>Andrew and Kath Bowren ajbrowen@gmail.com +27825624273</p> | <p>Hi Greg</p> <p>Unfortunately my wife and I will be out of town on Wednesday and thus cannot attend the meeting.</p> <p>Please record our apologies - (Andrew & Kath Bowren)</p> <p>Hope all goes well and once again our apologies Regards</p> | <p>Noted.</p> <p>The minutes were updated accordingly.</p> |