



24G Application: 14/2/4/2/2/B1/17/0008/21

ENVIRONMENTAL AUTHORISATION

The Trustees
Die Straat Trust
PO Box 95
RAWSONVILLE
6845

Email: nielstraat@compnet.co.za

Tel: (082) 375 9888

Attention: Daniel Petrus Hugo Jordaan

Dear Sir

APPLICATION IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA") FOR THE UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: THE UNLAWFUL CULTIVATION OF VIRGIN LAND ON FARM HOLLAND 630 PTN 1, WORCESTER

With reference to your application dated 14 October 2021 in terms of section 24G of the NEMA for the consequences of unlawful commencement of listed activities identified in terms of the NEMA, find below the decision in respect of your application.

A. DECISION

By virtue of the powers conferred by section 24G of the NEMA and the *Environmental Impact Assessment Regulations, 2014* ("EIA Regulations, 2014") (as amended), the competent authority herewith **grants environmental authorisation** to the applicant to continue with the listed activities specified in Section C below in accordance with the preferred alternative as described in the application and environmental assessment dated 14 October 2021.

The granting of this Environmental Authorisation is for the continuation, conducting or undertaking of the listed activities as described in Section C below and is subject to compliance with the conditions set out in Section G. This Environmental Authorisation shall only take effect from the date on which it has been issued.

The Environmental Authorisation does not exempt the holder thereof from compliance with any other applicable legislation.

B. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

Die Straat Trust
c/o Mr Daniel Petrus Hugo Jordaan
PO Box 95
RAWSONVILLE
6845

Cell: (082) 375 9888
Email: nielstraat@compnet.co.za

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "the holder".

C. LIST OF ACTIVITIES AUTHORISED

Listed Activities	Activity/Project Description
<p>Government Notice No. R386 of 2006 –</p> <p>Activity Number: 12</p> <p>Activity Description: <i>"The transformation or removal of indigenous vegetation of 3 hectares or more or of any size where the transformation or removal would occur within a critically endangered or an</i></p>	<p>The clearance of vegetation for the cultivation and establishment of 3 hectares of vineyards on land that were previously disturbed, but more than 10 years has lapsed prior to the cultivation.</p>

<p><i>endangered ecosystem listed in terms of section 52 of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)."</i></p>	
<p>Government Notice No. R544 of 18 June 2010 –</p> <p>Activity Number: 18</p> <p>Activity Description: <i>"The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from:</i></p> <p><i>(i) a watercourse;"</i></p>	<p>In preparing the land for cultivation, the applicant infilled an ephemeral river channel. It must be noted that the channel was already cut-off from the main watercourse by berms that were established before 1970.</p>
<p>As similarly listed in Government Notice No. R. 327 of 7 April 2017 -</p> <p>Activity Number: 27</p> <p>Activity Description: <i>"The infilling or depositing of any material of more than 10 m³ into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 m from a watercourse."</i></p>	<p>The development of 4ha of land intended to be cultivated in 2020/2021, that was part of the previous project but ceased due to enforcement process.</p>
<p>As similarly listed in Government Notice No. R. 324 of 7 April 2017 -</p> <p>Activity Number: 12</p> <p>Activity Description: <i>"The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan"</i></p>	<p>The development of 4ha of land intended to be cultivated in 2020/2021, that was part of the previous project but ceased due to enforcement process.</p>

The abovementioned list is hereinafter referred to as "the listed activities/development".

D. PROPERTY DESCRIPTION AND LOCATION

The listed activities commenced on Portion 1 of Farm No. 630, Farm Torpedo, Worcester.
The SG digit code is: C08500000000063000001

The co-ordinates for the property boundary are:

Point	Latitude (S)	Longitude (E)
1	33° 38' 48.18" South	19° 20' 08.78" East
2	33° 38' 59.54" South	19° 20' 05.45" East
3	33° 39' 07.65" South	19° 20' 37.85" East
4	33° 38' 22.17" South	19° 20' 57.67" East
5	33° 38' 23.61" South	19° 20' 41.03" East
6	33° 38' 54.07" South	19° 20' 27.45" East

The co-ordinates for the site boundary are:

Point	Latitude (S)	Longitude (E)
1	33° 38' 44.49" South	19° 20' 31.64" East
2	33° 38' 01.38" South	19° 20' 24.13" East
3	33° 39' 07.93" South	19° 20' 37.15" East
4	33° 38' 42.49" South	19° 20' 48.83" East
5	33° 38' 40.38" South	19° 20' 41.73" East
6	33° 38' 46.84" South	19° 20' 27.45" East

Refer to Annexure 1: Locality Plan and Annexure 2: Site Plan.

Herein-after referred to as "the site".

E. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

ETWO Water Management and Civil Engineering CC

c/o Mr Etienne Weidemann

PO Box 1153

WORCESTER

6849

Tel: (023) 347 4671

Fax: (086) 601 6126

Email: etwowater@gmail.com

F. DETAILS OF THE ACTIVITY/IES UNDERTAKEN

The application entails the unlawful cultivation of virgin land on Farm Holland 630 Ptn 1, Worcester.

The previous owners have transformed about 58ha of the 76ha extent between 1980 and 2000 when the pastures were originally established. When the applicant purchased the property in 2000, approximately 30ha were cultivated as irrigated pastures while the remainder had lain fallow for more than 10 years. At the time of the change of ownership to Die Straat Trust, the cultivated area was already degraded and not in a natural state due to alterations that were made to the Amandelspruit River system upstream from the development between 1970 and 1990.

The applicant commenced between 2006 and 2016 and unlawfully developed approx. 12ha of vegetation for the establishment of vineyards. An additional 4ha is intended to be developed for cultivation. For the remainder of the farm to the North, approx. 23ha will remain in its natural condition as indigenous vegetation.

G. CONDITIONS OF AUTHORISATION

The following are conditions of authorisation that are set and must be implemented for this Environmental Authorisation.

PART I

Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section C above in accordance with and restricted to the preferred alternative described in the application and assessment report dated 14 October 2021 on the site as described in Section D above.
2. The Environmental Authorisation is valid for a period of **five years** from the date of the decision.
3. The development must be concluded within three years from the date of continuation of the first listed activity.
4. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
5. Any changes to, or deviations from the scope of the alternative described in Section F above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

PART II

Written notice to the competent authority

6. Seven (7) calendar days' notice, in writing, must be given to the competent authority before continuation of commencement of the development activities.
 - 6.1 The notice must make clear reference to the site details and 24G Reference number given above.
 - 6.2 The notice must also include proof of compliance with the following conditions: conditions 7 and 9

PART III

Notification and administration of an appeal

7. The holder must in writing, within 14 (fourteen) calendar days of the date of this decision—
 - 7.1 notify all registered Interested and Affected Parties (“I&APs”) of –
 - 7.1.1 the outcome of the application;
 - 7.1.2 the reasons for the decision as included in Annexure 3;
 - 7.1.3 the date of the decision; and
 - 7.1.4 the date when the decision was issued.
 - 7.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the *National Appeals Regulations, 2014* detailed in Section I below.
 - 7.3 draw the attention of all registered I&APs to the manner in which they may access the decision.
 - 7.4 provide the registered I&APs with:
 - 7.4.1 the name of the holder (entity) of this Environmental Authorisation;
 - 7.4.2 name of the responsible person for this Environmental Authorisation;
 - 7.4.3 postal address of the holder;
 - 7.4.4 telephonic and fax details of the holder;
 - 7.4.5 e-mail address, if any, of the holder; and
 - 7.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the *National Appeal Regulations, 2014*.
8. The listed activities, including site preparation, may not commence within 34 (thirty-four) calendar days from the date of issue of this Environmental Authorisation. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.

PART IV

Management of the activity/development

9. The draft Environmental Management Plan/Programme (“EMPr”) of February 2021, that includes the Jan Du Toits Maintenance Management Plan of June 2014 and Rehabilitation Plan of November 2016, is hereby approved and must be implemented.

10. The EMPr must be included in all contract documentation for all phases of implementation.

PART V

Monitoring

11. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") before continuation of commencement of any land clearing or development activities to ensure compliance with the EMPr and the conditions contained herein.

12. A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and must be made available to anyone on request.

13. Access to the site referred to in Section D must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

PART VI

Auditing

14. In terms of regulation 34 of the *EIA Regulations, 2014* the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the competent authority annually and upon receiving such request in writing from the competent authority. The Audit Report must be prepared by an independent person and must consider all the information required in Appendix 7 of the *EIA Regulations, 2014*.

PART VII

Activity/ Development Specific Conditions

15. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.

16. A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.
17. The northern part of the site earmarked for conservation must retained for conservation purposes and must not be cultivated and cleared. This demarcated area can be seen as part of the approved site plan in Annexure 2.
18. The site earmarked for conservation purposes must be entered into a Steward Agreement with CapeNature. It must be presented at a stewardship review committee in order to determine the appropriate stewardship level the site qualifies for.
19. A copy of the Stewardship Agreement must be submitted to this Department within two years of this environmental authorisation.

H. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. Non-compliance with a condition or term of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.
3. If the holder does not continue, conduct or undertake listed activities within the period referred to in Condition 2 of Section G, this Environmental Authorisation shall lapse for that activity or activities, and a new application for Environmental Authorisation must be submitted to the competent authority. If the holder wishes to extend the validity period of the Environmental

Authorisation, an application for amendment must be made on condition that the environmental authorisation is valid on the date of receipt of such amendment application.

Note that:

(1) In terms of regulation 28(1A) of the *EIA Regulations, 2014* the competent authority shall not accept or process an application for amendment of an environmental authorisation if such environmental authorisation is not valid on the day of receipt of such amendment application but may consider an application for environmental authorisation for the same development.

(2) In terms of regulation 28(1B) of the *EIA Regulations, 2014* an environmental authorisation which is the subject of an amendment application remains valid pending the finalisation of the amendment application.

(3) It is an offence in terms of section 49A(1)(a) of the NEMA for a person to commence with a listed activity if the competent authority has not granted an environmental authorisation for the undertaking of the activity.

4. The holder must submit an application for amendment of the Environmental Authorisation to the competent authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the *EIA Regulations, 2014* must be submitted.

Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.

5. The manner and frequency for updating the EMPr is as follows:

Amendments to the EMPr must be done in accordance with regulations 35 to 37 of the *EIA Regulations, 2014* or any relevant legislation that may be applicable at the time.

I. APPEALS

Appeals must comply with the provisions contained in the *National Appeal Regulations, 2014*.

1. An appellant (if the holder) must –

- 1.1 submit an appeal in accordance with regulation 4 *National Appeal Regulations, 2014* to the Appeal Administrator and a copy of the appeal to any registered I&APs, any

Organ of State with interest in the matter and the decision maker within 20 (twenty) calendar days from the date the holder was notified by the competent authority of this decision.

2. An appellant (if NOT the holder) must –

2.1 submit an appeal in accordance with regulation 4 *National Appeal Regulations, 2014* to the Appeal Administrator, and a copy of the appeal to the holder, any registered I&APs, any Organ of State with interest in the matter and the decision maker within 20 (twenty) calendar days from the date the holder notified the registered I&APs of this decision.

3. The holder (if not the appellant), the decision-maker, I&APs and Organ of State must submit their responding statements, if any, to the Appeal Authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.

4. This appeal and responding statement must be submitted to the address listed below -

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator to the address listed above and/ or via e-mail to DEADP.Appeals@westerncape.gov.za.

5. A prescribed appeal form, as well as assistance regarding the appeal processes is obtainable from the office of the appeal authority/ at: Tel. (021) 483 3721, E-mail DEADP.Appeals@westerncape.gov.za or URL <http://www.westerncape.gov.za/eadp>.

J. CONSEQUENCES OF NON-COMPLIANCE WITH CONDITIONS

Non-compliance with a condition or term of this Environmental Authorisation or EMPr may result in suspension or withdrawal of this Environmental Authorisation and may render the holder liable for criminal prosecution.

K. DISCLAIMER

The Western Cape Government, appointed in terms of the conditions of this Environmental Authorisation, shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Yours faithfully

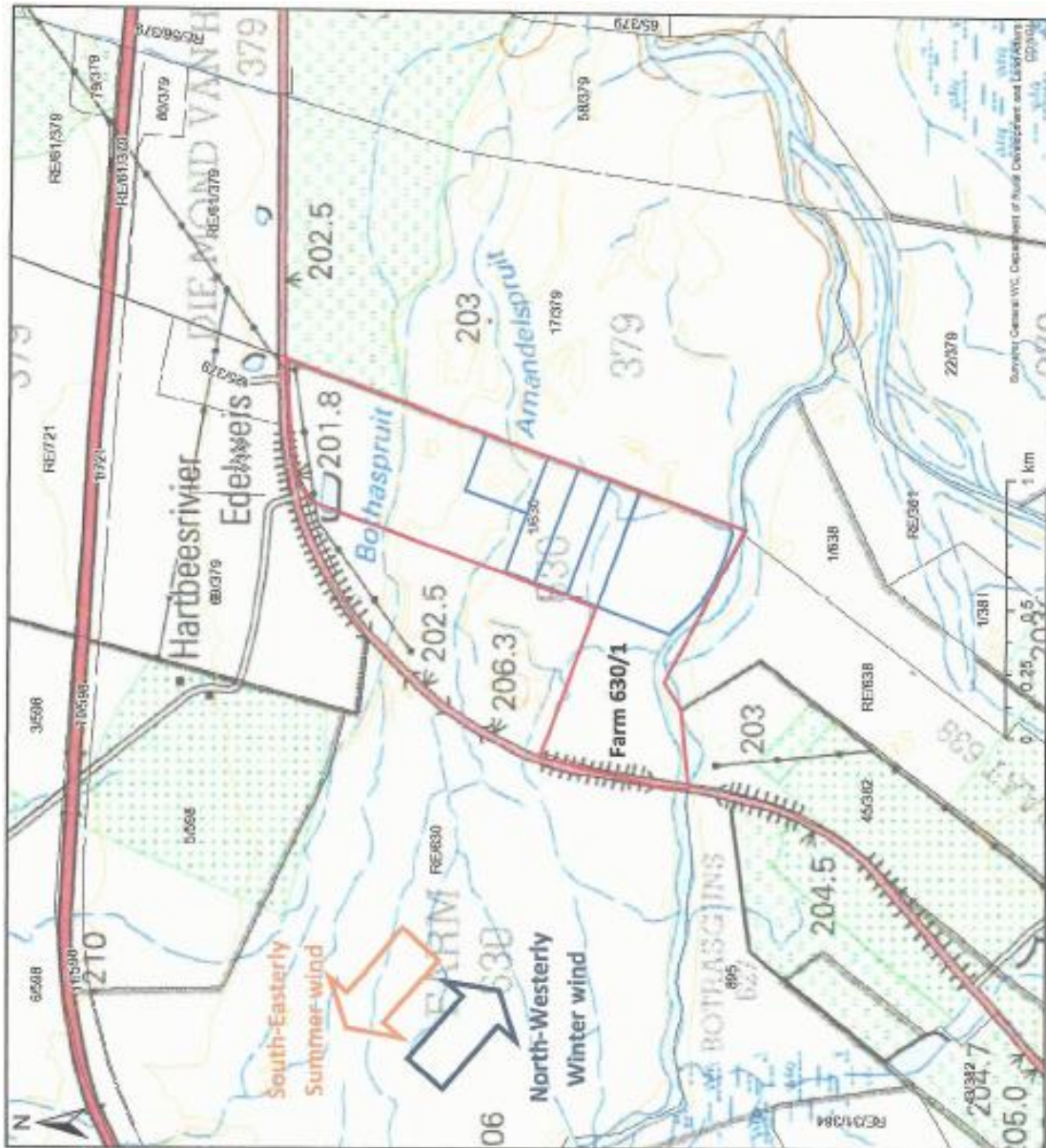
ZAIDAH TOEFY

ACTING DIRECTOR: ENVIRONMENTAL GOVERNANCE

Copied to: (1) Etienne Weidemann (EAP)

Email: etwewater@gmail.com

ANNEXURE 1: LOCALITY MAP



ANNEXURE 2: SITE PLAN



FOR OFFICIAL USE ONLY:

S24G REFERENCE:

14/2/4/2/2/B1/17/0008/21

ANNEXURE 3: REASONS FOR THE DECISION

This Environmental Authorisation is in respect of the consequences of commencement of the afore-mentioned illegal activities. An Environmental Assessment Practitioner ("EAP") was appointed to submit a section 24G Environmental Impact Assessment ("EIA") to the Department to obtain this Environmental Authorisation. The EIA was considered adequate for informed decision-making. In addition, the holder paid an administrative fine of R100 000 (One hundred thousand Rand) to meet the requirements of section 24G of the *National Environmental Management Act, 1998* ("NEMA").

In reaching its decision, the competent authority, *inter alia*, considered the following:

- a) The information contained in the application form dated 24 February 2021 with supporting environmental impact assessment and mitigation measures.
- b) The Environmental Management Plan (EMP) of February 2021 that includes the Jan Du Toits Maintenance Management Plan of June 2014 and Rehabilitation Plan of November 2016 submitted for the application.
- c) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation and Alternatives.
- d) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA.
- e) The comments received from Interested and Affected Parties ("I&APs") and the responses provided thereto.
- f) The sense of balance of the negative and positive impacts and proposed mitigation measures.
- g) The site visit conducted on 26 January 2022 attended by officials of the Directorate: Environmental Governance.

All information presented to the competent authority was taken into account in the consideration of the application for environmental authorisation. A summary of the issues which, according to the competent authority, were the most significant reason for the decision is set out below.

1. Public Participation Process

In terms of section 24G(1)(vii)(dd) of the NEMA, "...a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed ...", is required.

The public participation process conducted by the EAP comprised of the following:

- identification of and engagement with I&APs.
- fixing a notice board at the site where the listed activities unlawfully commenced.
- giving written notice to the owners and occupiers of land adjacent to the site where the listed activities were undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities on 11 September 2020.
- the placing of a newspaper advertisement in the **Worcester Standard** on 10 September 2020.
- I&APs were afforded the opportunity to comment on the application.

Consultation with organs of state in terms of section 24O of the NEMA

The following organs of state provided comment on the application:

- CapeNature (CN)
- Breede Gouritz Catchment Management Agency (BGCMA)
- Heritage Western cape (HWC)
- The Department of Agriculture (DoA)

CN requested a soil analysis to be conducted for the site, which was completed to CN's satisfaction. CN agreed with the findings of the Ecological Assessment that the land was previously disturbed by cultivation.

CN indicated that no offset is required as the landowner is willing to conserve the remaining vegetation on the northern part of the site. This area must be properly georeferenced and included as part of the conditions of the environmental authorisation. This must be conducted through a stewardship review committee to determine the appropriate level of stewardship.

The BGCMA indicated their agreement with alternative 1, i.e., the development of the additional 4ha with specific conditions, which included the following:

- Water usage (from the surface and borehole) is limited to the following volumes:
 - Groundwater: 176 563 m³/a

- Surface water: 180 167 m³/a
- The above volume is estimated, with proper soil and moisture management techniques, to cultivate up to 60 ha of vineyards (crop use factor of 6 0000m³/a).
- Any additional water usage over the above calculations requires authorization through the BGCMA.
- Water use regulations must be adhered to and monthly usage measurements sent through to BGCMA.
- Alien clearing of the property, highlighting the natural wetland area and the Breede River and Bothaspruit portions, must continue.

HWC stated that they have no reason to believe that that proposed cultivation will have any negative impact on Heritage resources and therefore they have no further comment on this application.

The DoA indicated that a complete soil analysis should be completed to determine the complete agricultural value of the soil, as well as to determine the soil characteristics and drainage of the site. An invasive alien clearing plan must be submitted and included as part of the maintenance of the site. Due to the farm's proximity to the Papenkuils wetland, the longitudinal slopes of the Breede river and Jan du Toits River is greatly reduced and sediment deposition is prevalent in this stretch of the river. The existing Maintenance Management Plan must therefore include the control of sediment deposition occurring on site. The DoA indicated that cover crops must be planted in between the crop rows to improve soil saturation capacity. *Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)* ("CARA") guidelines and best practices should be implemented on site for all agricultural related activities where applicable.

2. Alternatives

2.1 Design/Layout Alternatives

Alternative 1

Alternative 1 entails the development of the completed 12 hectares and excludes the 4 hectares development of the study area 1. The development of the additional 4 hectares would contribute to the sustainability of the farming unit. The additional development of the further 4 hectares will have a low negative impact with a high positive impact in terms of socio-economic impacts, thus motivating alternative 2 as the preferred option.

Alternative 2 (Herewith authorized)

This alternative entails the clearing of 4 hectares of natural vegetation (not cultivated in the past 10 years) in study area 1. The development of 12 hectares prior to 2016 has occurred and was completed. The 12 hectares is already cultivated, and the botanical impact is indicated as moderate negative (alternative 1), the additional 4 hectares (study area 1) is expected to have a low negative impact, both areas have a very low probability for successful rehabilitation. The development of the 16 hectares has a high positive impact in terms of socio-economic attributes, creating 21 permanent employment opportunities and 10 seasonal opportunities. The economic contribution is expected to exceed 15 million rand over 10 years.

2.2 The option of not implementing or continuing with the activity ("No-Go" Alternative)

The "no-go" alternative entails the rehabilitation of the 12 hectares of the 2016 developed area. The conditions for the rehabilitation of the developed areas are not favourable due to the prolonged changes in the environment since 1970. The transformation of the area started long before the illegal cultivation took place and rehabilitation is not considered by the botanist as a feasible option.

3. Environmental Impact Assessment (EIA) and Mitigation Measures

In reaching its decision, the competent authority, considered the following in respect of the EIA and mitigation measures:

3.1. Activity Need and Desirability

The development does not have a negative socio-economic impact but does provide minimal social benefit or positive social impact when taking into consideration potential job opportunities.

It is expected that the development will create job opportunities for 21 permanent workers and 10 seasonal workers. In addition to the job opportunities the development will enhance the sustainability of the farm and increase job security for the Trust and the workers on the farm.

Due to the difficult economic conditions during 2020 the development land helped to ensure that no employees lost their jobs. The development will create training opportunities for the farm workers to assist with the protection of the remainder of the natural area's on the property.

3.2. Biodiversity Impacts

The botanical specialist indicated that the development would have a moderate negative impact but concluded that the rehabilitation of the areas is not feasible due to the lack of water from the Amandelspruit. The biodiversity impact will be neutralized or improved by the protection of the area north of the development which is still a function wetland. The development has not and will not give rise on any impacts on biodiversity.

3.3. Visual / Sense of Place

The development is isolated and similar to the surrounding environment; no impact on sense of place is expected. The area also does not include any artefacts, features or infrastructure that could impact on a heritage.

4. **NEMA Principles**

The National Environmental Management Principles (set out in section 2 of the NEMA), which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the competent authority is satisfied that the listed activities will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

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