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**reference** SSD14/2/6/1/7/4/Eskom\_400-132 kV Houhoek Substation  
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Environmental Management Department  
BKS (Pty) Ltd  
P.O. Box 3173  
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0001

Attention: Bronwen Griffiths  
By email: [JO1887-Houhoek@bks.co.za](mailto:JO1887-Houhoek@bks.co.za)

Dear Bronwen

**Re: Draft Scoping Report for the Proposed Eskom 400/132 kV Houhoek Transmission Substation including the Bacchus-Palmiet Loop-In and Loop-Out Power Lines. Western Cape**

CapeNature would like to thank you for the opportunity to comment on the Draft Scoping Report and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

As indicated in the Scoping Report, the majority of the designated development envelope for the loop-in and loop-out power lines and the alternative substation locations is located within Critical Biodiversity Areas (CBAs). The Scoping Report contests these CBA designations. CapeNature maintains that the CBAs do need to be ground-truthed, particularly on a site-specific scale, in order to verify the designation. In general, a conservative approach was used in classifying areas as CBAs. It should be noted that some relatively degraded CBAs are selected for their importance for connectivity on a regional scale. Also, in Critically Endangered vegetation types, where only a very small proportion of the vegetation type remains (e.g. most renosterveld types), even the degraded remnants are of conservation importance.

The main vegetation type occurring within the development envelope is Kogelberg Sandstone Fynbos, with Western Rûens Shale Renosterveld occurring along the lower boundary, both of which are classified as Critically Endangered. CapeNature therefore recommends that substations, power lines and associated infrastructure is preferably located outside of CBAs, or areas that are identified as highly disturbed by the botanical specialist. As the vegetation types occurring on site are known to contain numerous Species of Conservation Concern, a detailed site survey must be undertaken by the botanical specialist during the peak flowering season (July-October) to ensure that important plant populations are not affected by the development proposal.

Another important factor to take into consideration is the management of the power line servitudes during the operational phase. The management of the power line servitudes does

have an impact on the outcome of the overall desirability of the development as it determines the long term impacts that the development will have.

A section of the proposed development envelope for the loop-in and loop-out power lines falls within Houwhoek Nature Reserve (a CapeNature nature reserves). The loop-in and loop-out power lines will link to the Transmission lines that currently traverse Houwhoek Nature Reserve. CapeNature has experienced significant negative impacts in the past when the existing Transmission power lines were built through the nature reserve, with excessive disturbance taking place, particularly the construction of access roads.

Another important factor to bear in mind is the importance of fire as an ecological driver in Mountain Fynbos ecosystems. This must be taken account of in the management of the servitudes, as fire poses a potential risk to the power lines, as well as the power lines potentially resulting in the ignition of fires, which can result in too frequent fires. It is recommended that current issues regarding management of the power line servitudes are resolved as this will be taken into consideration in further comments.

CapeNature supports the proposal of the Plan of Study for EIA to undertake the following specialist studies: wetland delineation and assessment, ecological assessment and avifaunal assessment. The above issues must be addressed particularly in the ecological assessment. More detailed site-specific mitigation and management measures will be commented upon in the EIA Phase. The EIA report must contain detailed, high quality maps of all the alternatives (substation and power lines) in order to allow for adequate assessment of the potential impacts.

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

Yours sincerely

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

Rhett Smart  
For: Manager (Scientific Services)

cc. Corlie Hugo, CapeNature