Eskom's Proposed Gamma-Grassridge 765kv Transmission Lines (x2) Project
EWT Response to stakeholder comments:

31 March 2008

Letter from ACER Africa dated 11 March has reference:

It must be clarified that the avifaunal study did not state either that no birds occur on the Jansenville corridor, or that a power line built there will have no impact on birds. The study selected that corridor as having the *least* impact of the available corridors. This does not mean that it is not a bird rich area, but rather that the bird species occurring there in greater abundance than elsewhere are not top priority species for this study. Not all bird species are impacted on directly by a power line of this nature.

Points 1 and 2.

'When the red lined areas which should be avoided according to fig 40 are compared on scale, then only the distance between Haasfontein and Wolwefontein, i.e. a distance of approximately 15km, where the impact of birds is more than on the Jansenville-Wolwefontein corridor.

This is the most critical 15km of any corridor in the southern half of the study area, and should be avoided, despite its relatively short length. Since the mathematical comparison of alternatives took length into account – it is even more significant that the Jansenville Hassfontein sub corridor emerged as the least sensitive despite being longer.

'Jansenville-Wolwefontein route there are ostrich farmers, i.e. route alignment is important'
'…these potential impacts on ostriches cannot be ignored and need to be managed through prudent helicopter flying'

Since ostriches are introduced and managed as livestock, I would argue that this does not fall in the scope of the avifaunal assessment and should rather be dealt with by the land use specialist.

'Remarks on the sensitivity table'

a) 3324BA was counted 24 times and 3324BB 28 times during the atlas period which is a very comparable coverage. Since the species report rate for each square is based on the species being seen anywhere within the square, one would therefore expect the Atlas to arrive at similar report rates if the species are indeed present in similar abundance. The fact that the report rates for Ludwigs Bustard, Kori Bustard, Secretarybird, and White Stork and differ so greatly means that there are indeed differences, perhaps as a result of 3324BA having the open area in the south as pointed out.

b) "most common train of thought….".

This would need to be explained further. Comparing the Atlas data collected scientifically over ten years to an undefined 'most common train of thought' is not realistic. Although Kori Bustard is one of the top 5 species in the study, in the final analysis it is not as high priority as flocking species such as Ludwigs Bustard, White Stork, and Blue Crane as collisions are less likely.

Flocking species such as Blue Cranes – are more vulnerable to collision since flying in flocks reduces the visibility for trailing birds, and simply because the more birds are in an area, the greater the odds of collisions occurring. If we had to choose then between placing a line in a "Blue Crane" area and a "Kori Bustard" area

we would have to choose to place it in the “Kori Bustard” area since the anticipated impacts would likely be lower.

c) The Sundays River flows well outside of the study area. With the possible exception of the White Stork which uses arable lands (possibly associated with the river) a river such as this has little relevance to the distribution of the power line relevant species.

d) The lower visibility on the Jansenville corridors is a valid point. However, it is the EWT’s professional opinion that this does not account fully for the difference in report rates recorded in the Atlas, or the difference in our own field observations.

Perhaps more importantly, the study also makes its recommendations based on the habitat differences, and as stated in the original study, the habitat on the Jansenville corridors is far from optimal for Blue Crane, Ludwigs Bustard (most of the area, with the possible exception of the area closer to Klipplaat), White Stork, and Secretarybird. The vegetation in the Jansenville area consists of predominantly “noorsveld” and other relatively dense vegetation such as valley bushveld. The height of this vegetation makes it less desirable for most large terrestrial bird species (with the possible exception of Kori Bustard which will use the more open areas within this vegetation) since these species prefer to forage where low vegetation ensures good visibility and hence easy predator detection. Although the Kori Bustard may occur in this vegetation, it is a solitary species which does not typically flock making it of less concern for collision impacts than flocking species such as Blue Cranes.

More broadly on the Atlas data:

The avifaunal study recognizes that the bird atlas data is now relatively old (collected 1986-1997). However this data set is still our best available data on distribution & abundance of bird species. The data collection methods were scientific and allow comparison between areas. As it was collected over an eleven year period, our confidence in its reliability & representation of conditions, seasons etc can be high. The data from the CAR count route EP02 supports the atlas data in identifying the Mt Stewart to Wolwefontein area as having high abundance of the relevant species. This CAR route was counted twice each year from 1998 to 2001 and so is also long term data.

‘a more likely table’

See ‘b’ above, this data would need to be substantiated somehow.

‘…the specialist report ignores all other species’

The other species have not been ignored by any means. The study assessed the significance of impacts on all Red Data and non Red Data species, and then based on the most significant impact (collision), focused on the most relevant species. Collision is a direct impact which kills both Ludwigs Bustard and Blue Crane in particular at unacceptable levels, and is hence prioritized above the indirect effect of removal of a relatively small amt of habitat in an area where this habitat is widely available. None of the top species are generally threatened by habitat transformation in this area of the country.

‘the Jansenville Haasfontein corridor is longer…(therefore more habitat removal is required)

15km on the total line length of approx 350km equates to 4% longer. See above comment on importance of habitat destruction relative to collision.

The comment that not all areas/farms were visited

Visiting individual landowners was not part of the specialists brief. Neither time nor resources permit this on a study area of this size. In some specific areas, it is acknowledged that the avifaunal study could have benefited from local knowledge. At the time of avifaunal field work, all IAAP comments relating to birds received by ACER were taken into account. However, at that stage no comment had been received from the Jansenville area.

Field work for this study originally included the following phases: an initial three day group visit by both road and air; and a second individual visit of three days on the ground (see the figure below for the routes driven during this visit, although farm houses were not reached, an adequate coverage of the study area was achieved).

In order to confirm the original recommendations, a third two day visit on the ground to the currently disputed areas was conducted on 27 and 28 March 2008. The routes driven were the same as in the second site visit. The area was driven at a maximum speed of 40km/h, stopping and getting out to scan with binoculars atleast every 2 km, but preferably at vantage points. In total, 9 hrs 40min were spent on the Jansenville corridors, and 1 hr 50min on the Main corridor. Despite this bias, on the Jansenville side, 1 Kori Bustard was seen, whilst on the Main Corridor, 87 Blue Cranes and 2 Kori Bustards were seen (approximate positions below).

Point 3. Impacts on the Blue Crane

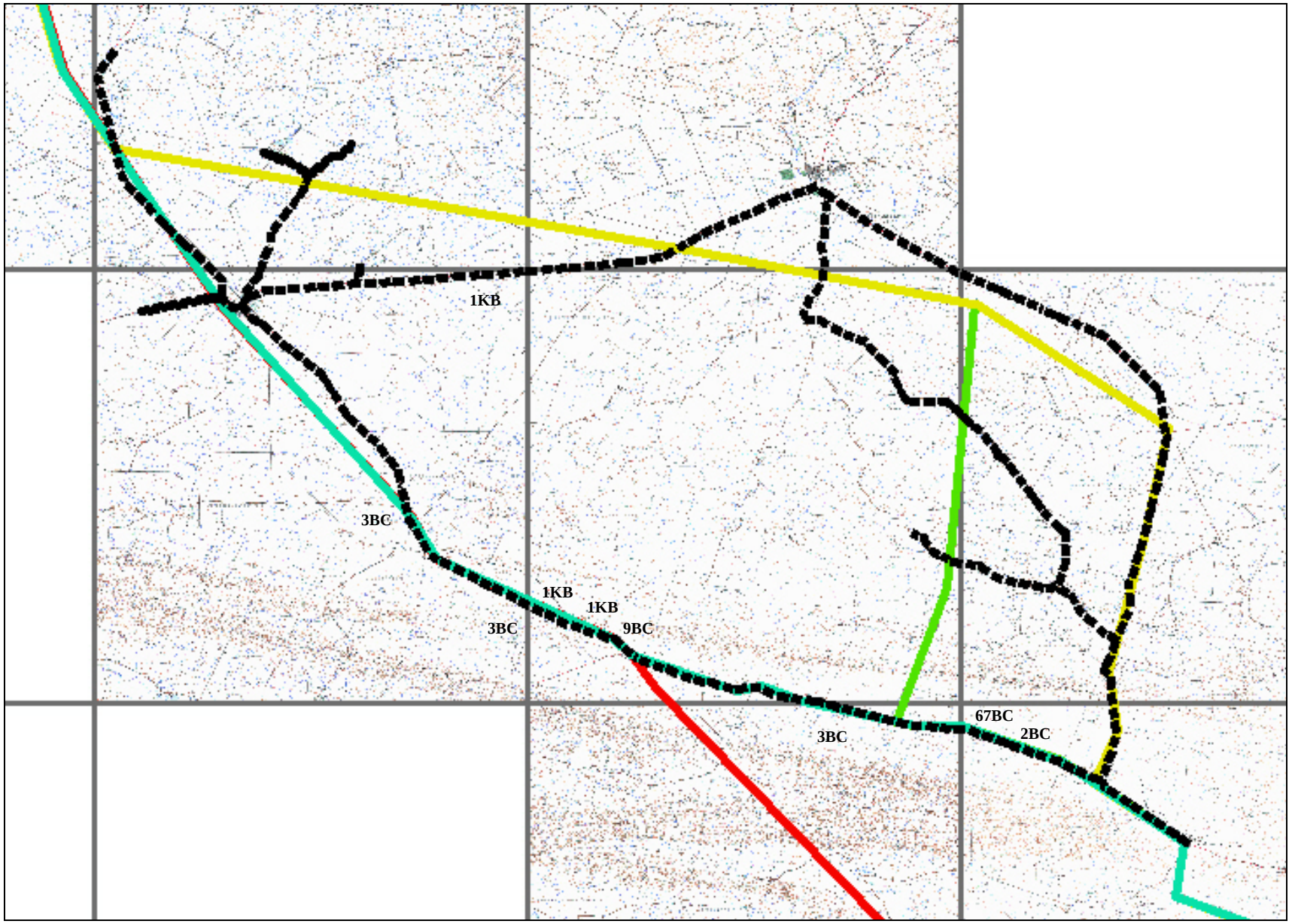
The Eskom-EWT Strategic Partnership is well aware of the impacts of both existing and new power lines across the country on this species, particularly in the Karoo. Work on this impact is ongoing and consists of identifying, and recommending for Eskom to mark high risk sections of line with anti collision marking devices. Since accurate data on the number of birds killed is not easy to obtain (not all bird collisions are detected or reported), it is difficult to assess the success of this line marking in reducing collisions.

Point 4. Five specific sensitive areas identified

No additional work was done in these areas, they were identified as having a combination of dams, several dams, arable lands, and wetlands or pans which is extremely attractive to several of the key species for this study. Field verification of the Jansenville Haasfontein Subcorridor was carried out as far as road access allowed, see point 1 and 2 above. The below figure shows the areas driven during field verification

Point 5. Transnet's potential plans

This has subsequently been confirmed as not being a possibility.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