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Email: [vici@sefsa.co.za](mailto:vici@sefsa.co.za)

Dear Vici

**RE: PROPOSED KUDU 400kV TRANSMISSION LINE BETWEEN THE ORANJEMOND AND JUNO SUBSTATIONS AND THE UPGRADING OF THESE SUBSTATIONS (KUDU INTEGRATION PROJECT)**

CapeNature would like to thank you for the opportunity to comment on this proposed activity and wish to make the following comments. Please note that these comments relate only to the ecological component of the activity *in the Western Cape Province*. There are some very concerning issues in the Northern Cape; however, it is beyond our mandate to comment on this area. We trust that appropriate input will be sought from the relevant authorities.

General:

1. We apologize for the late submission of our comments. Unfortunately, in December last year we received a CD containing the EIA and associated documentation. This had no covering letter and was not addressed to our Land Use Advisory Unit. In future, please address all applications to this unit, with the necessary covering information, to ensure expedient processing of applications. Unfortunately, the botanical report was missing from this CD, a serious omission considering the potential botanical impacts of the project. On the 11 January we emailed your office to request a copy of this report and extension of the comment period. Eventually, on the 25 January, a CD arrived, but once again the botanical report was missing! Fortunately, we downloaded the necessary report on the website (it was initially not available there when we first checked); better communication would certainly have helped this process.
2. We found the information made available to us confusing and difficult to navigate. For example, the files are not clearly labeled and ordered on the CD, the list of tables was not accompanied by the relevant page numbers and the detailed route alignments were not clearly described or depicted in the main report. In future, we request that more effort is made to present information in a clear and accessible format.
3. We are very concerned with the level of detail of the assessment. While we recognize that, given the scale of the proposed project, detailed information is costly and difficult

to provide, we suggest that in light of the potentially significant impacts on biodiversity it is imperative to understand and plan around these impacts in more detail. We are not convinced that the proposed walkthroughs, after the issuing of an authorization, is the best process to follow, as once approved, it would be difficult to enforce any further conditions that may be necessary to protect the environment. Furthermore, considering the level of detail applicants dealing with much smaller parcels of land are required to follow, it would be difficult for CapeNature to condone such a broad brush approach.

4. We therefore recommend that this **EIA be seen as a strategic level assessment**, to identify the most acceptable route. We then recommend that a **more detailed assessment** is undertaken to deal with the more site specific issues in areas identified as sensitive. We recommend that **authoritarian is only considered on the basis of the latter report**.

#### Avifauna

5. Please note that none of the appendices to the Bird Impact Assessment were included with the information provided to us for comment.
6. It is apparent that, irrespective of which alternative is chosen, there will be bird-powerline interactions. Over the past few years, Eskom has developed mitigation measures, which reduce the impacts of this considerably, but do not eliminate the problem.
7. CapeNature supports the recommendations made in the Bird Impact Assessment report. We especially would like to highlight the importance of a 'walk through' by a qualified specialist once the line and towers have been pegged (please see point 4 regarding when in the process we recommend this is done).
8. From the perspective of impacts on birds, Alternative C is the preferred option. However, considering that this is a 'no-go' option from a botanical perspective, this not the desirable from an overall biodiversity perspective.
9. Alternative G, the overall preferred alternative according to EIR, potentially has the second worst impacts on birds. It is therefore imperative that mitigation measures are put in place (in locations identified in the walkthroughs), to reduce the impacts to acceptable levels.

#### Botanical issues:

10. Given the limitations of the botanical study with regards to time and access to the sites, we believe that the Mr Helme did a good job of identifying, at a broad level, the potential impacts of the various alternatives.
11. From a botanical point of view, we would prefer alternative D, but Alternatives E and G are acceptable, provided all sensitive sites, as indicated by botanical report, are avoided and all mitigation measures as outlined in the botanical report are followed.
12. In addition we would like to suggest, once again that, should the development be approved, it is critical that Eskom fly in pylon structures in sensitive areas. This includes the stringing of cables within sensitive areas, which must either be walked or flown in. Vehicles should not be used.

#### Summary and conclusions:

13. **CapeNature would not support alternatives A, B, C or F.**
14. From a biodiversity perspective, **CapeNature prefers Alternative D**, but the impacts of **alternatives E and G are acceptable**, provided the recommended mitigation measures, as suggested by the botanical and bird specialists are implemented

The Western Cape Nature Conservation Board trades as **CapeNature**

Board Members: Prof Mohammed Bayat, Prof William Bond, Mr Mark Botha, Mr Christopher Clarke, Mr Russell du Plessis, Ms Fikiswa Fesi, Dr John Hanks, Mr Elton Jethas, Adv Mandla Mdludlu, Ms Yasmina Pandy

15. We urge that more than one ECO is made available to ensure an appropriate level of expertise and presence across the landscape.
16. We strongly recommend that more detailed assessments of the preferred route are undertaken, **prior to authorisation**. CapeNature would be happy to comment on this additional information.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that might be received. We look forward to further discussions at the meeting planned for the 8<sup>th</sup> February.

Yours sincerely



Samantha Ralston, Kevin Shaw and Annelise le Roux  
For: Manager (Scientific Services)