



01 February 2007

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STRATEGIC
ENVIRONMENTAL
FOCUS

Attention: Samantha Ralston

**CONSIDERATION OF STAKEHOLDER COMMENT ON THE EIA PROCESS FOR THE
ESKOM KUDU INTEGRATION PROJECT**

Dear Ms Ralston

Your letter regarding the above dated the 25 January 2007 (received by email on 26 January 2007) refer. SEF has reviewed your comments and would like to respond as follows.

Documentation and information

We apologies for the inconvenience cause with the delivery of the EIA Report to your offices, I was unfortunately not in the office at the time to oversee the distribution of the Report to key stakeholders such as CapeNature. The omission of the Botanical Assessment was an oversight on our behalf and we apologies for this. I have addressed the issue of saving information onto CDs. In future, information will be presented in an ordered and easily interpretable manner.

Level of detail of the assessment

The level of detail in the assessment is of necessity very broad because of the size of the study area (more than 400km in length). Especially when considering that a number of alternatives have to be investigated over such a large area, is it almost impossible to undertake detailed surveys of each alternative and a broad view of the environmental constraints must be maintained. Your suggestion that the impacts of the power lines should be investigated in more detail later is valid, and this is the purpose behind the walk-through assessment prior to construction. It is recognised that there may be sensitive features identified during the walk through assessment that may have been missed during the initial broad assessment, and if this is the case, it may be necessary to amend the Record of Decision to allow the alignment to be changed. A recommendation to allow for such amendments will be made in the EIR so that the final choice of the most appropriate detailed alignment is not constrained by the alignment authorised in the Record of Decision.

EIA as a strategic level of assessment

The value of a two stage assessment is recognised and one of the purposes of the walk through assessment later on is to determine whether there have been any sensitive features missed during the initial broad assessment. However, withholding the Record of Decision until a further more detailed EIA is not supported, as this would amount to cumulative decision-making.

Avifauna

I have reviewed the information saved onto the CDs for distribution to key stakeholders and these do include Appendices A-D to the Bird Impact Assessment. The appendices will be provided to you, they will be attached to the e-mail accompanied by this letter.

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It is recognised that bird impacts can never be eliminated, and can at most be limited through appropriate mitigation. The walk through assessment, on completion of the route, is one of the key recommendations of the EIR. It is agreed that appropriate mitigation must be put in place at all locations identified in the walk-through assessment.

It is recognised that C is the preferred option from a bird point of view. However, taking the totality of the biodiversity impacts into account, it is agreed that this is not the best option.

Botanical issues

SEF also believes that Mr Helme provided a thorough report identifying, at a broad level, the potential impacts of the various alternatives.

It is a key requirement that all sensitive areas identified in the botanical study must be avoided. Any impacts on these sensitive areas would be considered as impacts of unacceptably high significance.

The option of flying in pylons in sensitive areas is supported and will be recommended in the final EIR.

Preferred alternatives

SEF acknowledges that CapeNature does not support alternatives A, B, C or F. SEF notes that CapeNature prefers alternative D, but that the impacts of alternatives E and G are acceptable. It is agreed that the effective implementation of the mitigation measures is a key requirement and recommendation.

ECO

Should construction take place at two or more locations situated far from each other at the same time, then the appointment of more than one ECO is recommended. Such a condition will be included in the recommendations.

Walk through assessment

The results of the walk through assessments will be provided to CapeNature for comment.

I would like to thank you for your valuable comments. SEF would like to continue with the EIA process in a spirit of co-operation and openness and we invite you to continue interacting with us throughout this process in the interests of identifying the most environmentally sustainable alternative.

SEF looks forward to further discussion with CapeNature should CapeNature be able to make representation at the meeting planned for the 8th of February.

Yours sincerely



Vici Napier
For Strategic Environmental Focus (Pty) Ltd