

CapeNature
Private Bag X6546
George
6530

Your reference: 14/2/6/1/6/7_OUDT/132kV_2012/150
Our reference: 11032
Date: 11 July 2013

FOR ATTENTION: (landusegeorge@capenature.co.za)

Dear Benjamin

RE: PROPOSED CHANGE OF LAND USE BY CONSTRUCTION AND INSTALLATION OF A 132 kV TRANSMISSION LINE APPROXIMATELY 27KM IN LENGTH BETWEEN OUTENIQUA 132kV SUBSTATION AND OUDTSHOORN SUBSTATION, OUDTSHOORN

Thank you for your correspondence dated 28 February on behalf of CapeNature.

We hereby respond to the comments raised, accordingly:

The botanical report acknowledged that the entire length of the alternative routes was not surveyed and vegetation patterns were extrapolated with point vegetation surveying and maps; as indicated on the partially legible figure 4.

Noted. Due to limited access to alternative route 2 (lack of access roads, steep terrain) the specialist was not able to access the entire length of the alternative route. The specialist utilized up-to-date vegetation maps issued by SANBI, CapeNature and accredited vegetation guides to provide an accurate extrapolation where a site analysis was not possible. Please refer to the Botanical Report (Appendix D) for extrapolations and locations where site inspections were possible.

As indicated in the freshwater assessment report all ephemeral streams (and / or drainage lines) and tributaries of the abovementioned rivers have been identified as important Ecological Support Areas; based on being potential aquatic habitats; with habitats for threatened ecosystems; and as priorities identified by other fine-scale plans. CapeNature agrees with the findings and recommendations provided by the aquatic specialist.

Noted. Please note that all mitigation measures and recommendations by the freshwater specialist have been incorporated into the EMP (Appendix G) in Section 6.7, page 10.

CapeNature will not support the loss of any threatened ecosystems, neither the transformation of identified sensitive areas (CBA's / ESA's / NFEPA's); and nor incompatible land uses for biodiversity conservation objectives. All endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature, should endangered or protected species be found to occur on site.

Noted. Please refer to the Botanical Report (Appendix D) as well as the EMP (Appendix G, section 6.7) for mitigation measures in terms of vegetation management. Further, please refer to the EMP (page 16) with regards to the application for plant collection/ removal permits.

CapeNature requires more information based on operational experience with Eskom distribution implementing activities during refurbishment of servitudes and infrastructure, as well as the installation of new servitudes and structures such as this. It is recommended that the botanical evaluation be complemented by a detailed focused description of vegetation occurring at each tower position so that this can further inform a site and habitat specific EMP; conducted by a qualified individual familiar with the terrain. Protected or endangered plant species that may have

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to be moved away from a tower position can be applied for by a plant collection / removal permit. CapeNature requires in addition to spatially explicit tower positions (in the form of a shapefile) an indication of proposed access routes to each and every tower position (preferably in the form of a shapefile), so that potential impacts can be adequately scoped and assessed before commencement.

Noted. Please note that at this stage of the powerline design process the surveying for individual tower positions has not been completed, therefore exact coordinates cannot be supplied at this time. Due to the high cost implications of powerline surveys, Eskom completes such a survey, resulting in the finalized route and exact tower positions, for the route alternative which receives a positive Environmental Authorization. As a result, the location of potential access roads required also cannot be established at this time. However, bend points, which have been mapped accurately at this stage of the project, can be used to extrapolate tower positions, due to the linear nature of the powerline. Bend points for the preferred alternative route and the alternative route can be found in Appendix J. These bend points do not represent all the towers to be erected for the proposed powerline, however, at this stage of the project these coordinates provide accurate tower positions for some of the towers to be erected.

In terms of the vegetation assessment, please refer to the Botanical Report in Appendix D. A corridor approach, with multiple sampling points within the corridor, was taken by the Botanical specialist in order to obtain the most accurate impact assessment without the availability of exact tower positions. It is customary for Eskom to conduct a detailed route walk during the surveying of a powerline prior to construction. This route walk can be conducted with a qualified Botanical specialist who can identify any areas of concern in terms of sensitive vegetation before commencement of construction (refer to the EMP, Appendix G, page 7). As per EMP (Appendix G, page 16) plant removal/ removal permits will be applied as applicable.

Note: The FBAR and EMP are now available for comment from 11 July 2013 to 2 August 2013. Kindly forward any comments (with relevant reference number) directly to DEA as per contact details below:

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Yours sincerely



Ursina Rusch
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