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<p>444/84 JH Boshoff PO Box 328 Brits 0250 Tel: 012 252 3536 083 306 9138 Email: jan@vdjbrits.co.za</p>	<p>Registered Letter and Email Notification of availability of Draft BAR</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP No comment received.</p>
<p>444/83 Pearl Coral 1082 cc David Rennie PO Bix 2188 Plettenberg Bay</p>	<p>Registered Letter and Email Notification of availability of Draft BAR</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP No comment received.</p>

448/9 448/10 448/12 444/144 444/147 South African Road Agency Private Bag X 19 Bellville 7535		
444/6 Salt Rock Enterprises PO Box 1338 Plettenberg Bay 6600	Registered Letter Notification of availability of Draft BAR	22/06/12 – 01/08/12: Draft BAR PPP No comment received.
444/5 RG Derbyshire PO Box 1338 Plettenberg Bay 6600	Registered Letter Notification of availability of Draft BAR	22/06/12 – 01/08/12: Draft BAR PPP No comment received.
448/5 Ambrosia Mineral Water PO Box 307 Plettenberg Bay 6600	Registered Letter Notification of availability of Draft BAR	22/06/12 – 01/08/12: Draft BAR PPP No comment received.
305/15 305/16 305/56 Twin Rivers Development Estate PO Box 2193 Plettenberg Bay 6600	Registered Letter Notification of availability of Draft BAR	22/06/12 – 01/08/12: Draft BAR PPP No comment received.
448/6 Scopefull 77 (Pty) Ltd PO Box 405 Plettenberg Bay 6600 Hutchinson, Du Plessis, Robin & Stoloff Attorneys 8 High Street Plettenberg Bay 6600 Ian M. Stoloff/Gloria Woolard (Secretary) Tel: 044 533 4485 Fax: 044 533 3733 Email: Gloria@hdrs.law.za	Registered Letter Notification of availability of Draft BAR Email Notification of availability of Final BAR & EMP	22/06/12 – 01/08/12: Draft BAR PPP 16/07/12: Mr. Ian Stoloff on behalf of Scopefull 77 requested to be registered as an I&AP 23/11/12: SiVEST confirmed that Scopefull 77 is a registered I&AP 24/07/13-16/08/13: Final BAR PPP
305/1 305/6	Registered Letter Notification of availability of Draft BAR	22/06/12 – 01/08/12: Draft BAR PPP

<p>RSA Private Bag X9027 Cape Town 8000305/9</p>		<p>No comment received.</p>
<p>MPG Investments (Pty) Ltd c/o Shamtham Trust 94 Sidwell Avenue Port Elizabeth 6001</p>	<p>Registered Letter Notification of availability of Draft BAR</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP No comment received.</p>
<p>305/10 Shock Proof Inv 240 (Pty) Ltd PO Box 2502 Plettenberg Bay 6600</p>	<p>Registered Letter Notification of availability of Draft BAR</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP No comment received.</p>
<p>Diana Grant Grant Johnston Associates Tel 044 533 0728 Email: dianagrants@mweb.co.za</p>	<p>Email Notification of availability of Final BAR & EMP</p>	<p>26/06/12: - Mrs. Diana Grant emailed SiVEST requesting an electronic link to access the Draft BAR and EMP 27/06/12: - SiVEST responded, providing Mrs. Grant the link to download the project details on the SiVEST website. 24/07/13-16/08/13: Final BAR PPP</p>
<p>Redford Conservancy Redford House 12Redford Road The Craggs PO Box 70 The Craggs, 6602 Sharon van Hees Tel: 044 534 8142 Fax: 044 534 8188 Cell: 083 409 7556 Email: mazoe5@mweb.co.za</p>		<p>03/08/12: - Mrs. Sharon van Hees contacted SiVEST via email requesting registration as an I&AP and had the following comments: - “For the record, at this stage our concerns centre around the possible environmental impacts of the proposed development in their broadest sense – - On the local flora and fauna, with a special note about the Blue Cranes that make a regular appearance on one of the adjoining farms (444/144, I think); - On the risk of soil erosion inherent in the clearance process on the identified site; - In respect of pollution and waste, especially given the proximity of the site to the Bitou River and floodplain”. - “We would also like to know what path the outgoing power lines are proposed to take towards The Craggs – we assume that the substation is intended to supplement power supply to the eastern areas of Plettenberg Bay.” 03/08/12: - SiVEST responded, confirming registration. 05/06/13: SiVEST responded: - Noted. The proposed Route 4B powerline as well as the</p>

	<p>Email Notification of availability of Final BAR & EMP</p>	<p>proposed Substation at Site C traverse degraded and/or alien infested vegetation and degraded terrestrial habitat as identified in the Botanical (page 5 & 11). The Estuarine Ecology specialist reports (Appendix D) did not identify any estuarine vegetation at the proposed footprints (page 6). As outlined in the site-specific EMP (Appendix F), mitigation measures to ensure minimal impact on vegetation and area ecology are in place (pages 10, 11 and 13 of the EMP). Overall, the impact of the proposed infrastructure is considered to be low with the recommended mitigation measures. In terms of avifauna mitigation measures, please refer to the Estuary Ecology report (Appendix D) which proposes specific mitigation measures (refer to page 20 to 22) to reduce the risk of diurnal and nocturnal bird collisions with the proposed powerline.</p> <ul style="list-style-type: none"> - Noted. The EMP contains specific erosion mitigation measures (refer to page 13, Appendix F) to ensure that erosion during the construction and operational phase of the project is reduced to low-negligible levels. Additionally, erosion impacts during the operational phase near the EFZ are addressed on page 18-19 of the Estuary Ecology specialist report (Appendix D). The specialists recommend the stabilization of all pylon sites and the substation sites with gravel and vegetation. - Noted. The EMP (refer to pages 9, 13 and 15, Appendix F) contains specific pollution prevention measures and waste management on-site. Further, the Estuarine Ecology report (Appendix D), further provides specific mitigation measures with regards to pollution and run-off into the Estuary. Specifically, the specialists identified a culvert near the development site which may act as a carrier for construction site pollutants into the Estuary. Special mitigation measures for this culvert have been implemented into the EMP (page 13). <p>24/07/13-16/08/13: Final BAR PPP</p>
Authorities		
<p>Department of Environmental Affairs 315 cnr Pretorius and Lilian Ngoyi Street Fedsure Forum Building North Tower Pretoria 0001</p> <p>Ndivhudza Sebei Email: nsebei@environment.gov.za Tel: 012 395 1774 Fax: 012 320 7539</p>	<p>3X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>29/10/21: Mr. Milicent Solomons on behalf of DEA contacted SiVEST via email after the Plettenberg Bay Community Environment Forum expressed concerns with regards to the notification of I&AP's for the project. The PBCEF was concerned as the I&AP's of Powerline Routes 1-3 had not been notified of the Draft BAR publication. Mr. Solomons recommended that the Draft BAR and EMP be made available to the PBCEF and other potentially affected parties that had to date been "excluded" from the process. It was noted that even though Powerline Routes 1-3 have</p>

	<p>3X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review</p>	<p>already received an EA in April 2010, that there is a link between those Routes and the Substation Site C and Route 4B which are currently undergoing the BA process and that the I&AP's of the approved line must be informed of the new application.</p> <p>7/11/12 SiVEST responded: SiVEST confirmed that all I&AP's along Route 4B and Substation Site C were notified. In addition all I&AP's of Route 4 (4A was part of the previous application and received an EA) were also notified. A newspaper advert had been placed in Die Burger, and the Draft BAR and EMP were available at the local library and on the SiVEST website.</p> <p>SiVEST confirmed that the PPP process had been transparent to date and that all I&AP's associated with the current Application were included in the process. SiVEST further confirmed that it had engaged with the PBCEF and a CD with all relevant documents were mailed to them during the Draft BAR PPP Phase.</p> <p>SiVEST confirmed that upon PBCEF, all I&AP's of Routes 1-3 as well as 4 will be notified of the publication of the Final BAR for comment.</p> <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>Eden District Municipality 54 York Street George 6530</p> <p>Vernon Gibbs Tel: (044) 803 1410 Email: Gibbs@edendm.co.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p> <p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>30/07/12:</p> <ul style="list-style-type: none"> - Email received from Vernon Gibbs requesting I&AP registration of the Eden District Municipality. - SiVEST responded and confirmed I&AP registration. <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>Bitou Municipality Ludolph Gericke/Hendry Geldenhuis Private Bag X1002 Plettenberg Bay 6600</p> <p>Tel: 044 501 3000 083 461 9941 (L. Gericke) 083 448 5441 (H. Geldenhuis) Email: lgericke@plett.gov.za Email: hgeldenhuis@plett.gov.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p> <p>1X Hardcopy and CD of FBAR, EMP and</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>26/06/12: Email received from Ilme Malherbe by the client (Eskom) stating:</p> <ul style="list-style-type: none"> - Request to assist in expediting the BA process. - Provide contact details to Eskom/SiVEST to attend meetings if necessary. - Eskom responded, informing Ilme Malherbe that a Draft BAR and supporting documents were delivered to Bitou Municipality on June 22, 2012 addressed to Mr. Ludwig Gericke <p>24/07/13-16/08/13: Final BAR PPP</p>

	supporting documentation delivered for comment and review.	
<p>Cape Nature 4th Floor York Park Building, York Street, George 6530</p> <p>Mr. Benjamin Walton Tel: (044) 802 5300 Fax: (086) 645 2546 Email: landusegeorge@capenature.co.za</p>	1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>06/08/12: Email received from Benjamin Walton stating the following:</p> <ul style="list-style-type: none"> - This application is subject to the Outeniqua Sensitive Coastal Area Extension Regulations as sections of the property are located within the Outeniqua Sensitive Coastal Area Extension (“OSCAE”) boundary. - Mapped vegetation units occurring on the property are: Cape Coastal Lagoons, Cape Estuarine Salt Marshes, South Outeniqua Sandstone Fynbos, Vulnerable Garden Route Shale Fynbos, Southern Cape Afrotemperate Forest and Endangered Western Cape Milkwood Forest. - The transmission line as well as substation is located in designated sensitive areas (including CBA/ESA/NFEPA). - The proposed linear development traverses and is situated within three designated River FEPA’s and associated sub-quaternary catchment areas, draining towards the Largely Natural Bietou River. The linear powerline development is within the estuarine functional zone of the Bietou River Estuary, and within 100 metres of the High Water Mark of the sea (Coastal Public property zone), which includes rivers with a tidal influence. - CN will not support the loss of any threatened ecosystems, neither the transformation of identified sensitive areas (CBA/ESA/NFEPA); and nor incompatible land uses for biodiversity conservation objectives. CN does not usually support development within the estuarine functional zone or within a highly sensitive area coastal area. <u>It is however acknowledged that the 66 kV transmission line and associated substation are required to service development north of the Bietou River; and limited infrastructural installation is permissible within designated sensitive areas based on regional need.</u> - The area is infested with invasive alien plant <i>Acacia mearnsii</i>, which must be removed from site as well as from the cliff face to prevent future destabilization prior to construction. - Assessment for the founding of pylon towers with the Bietou River Estuarine functional zone is required. - CN requests for an investigation of the receiving environment within the estuarine functional zone in which the support pylon Towers are to be installed from a geotechnical engineering perspective. Measures to prevent excessive disturbance during construction within the estuarine functional zone need to be expanded upon. Contextualize the assessment i.t.o. the published Fine-Scale Plans concerning the Critical Biodiversity Area conservation network, as well as the

		<p>National Freshwater Ecosystems Priority Areas map.</p> <ul style="list-style-type: none"> - All endangered species or protected species listed in Schedules 3 and 4, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000, may not be picked or removed without the relevant permit, which must be obtained from CN. - CN objects to the proposal in its current form. <p>05/06/13: SiVEST responded:</p> <ul style="list-style-type: none"> - Noted. A application in terms of the OSCAE for a permit to undertake scheduled activities on an Erf has been lodged with the Environmental Coordinator at Knysna Municipality (refer to Appendix G). - Noted. A detailed Botanical and Estuarine Ecosystem study (refer to Appendix D) were conducted in order to assess the proposed development footprint and formulate detailed mitigation measures for the EMP (refer to Appendix F). The Department of Forestry has been approached with regards to the trimming of a Milkwood tree in the vicinity of a proposed pylon leading into the proposed substation location site C. Please refer to Appendix G for the completed Tree Permit application as well as further records of communications and site-visits with DAFF found in Appendix E "Comments & Responses". - Noted. The proposed substation location is located in a degraded area, infested with alien vegetation as per the Botanical Specialist report (refer to Appendix D). The majority of the powerline route will be located along the road reserve of the N1 where the land is transformed. A detailed Estuarine Ecology study and associated EMP (refer to Appendix D and F respectively) inform the development of the pylons in the EFZ. - Noted. A detailed Estuarine Ecology study (refer to Appendix D) has been conducted in order to assess the potential impacts of the proposed substation and powerline. The powerline will span the above-mentioned watercourses with the pylons to support the line carefully placed in areas least likely to impact the riverine and estuarine ecosystems. A detailed Estuarine Ecology study (refer to Appendix D) and EMP (refer to Appendix F) will inform the proposed development. - Noted. In order to minimize the impact of the proposed development in the sensitive areas, extensive and detailed measures were taken to ensure that detailed, site-specific mitigation measures will be in place for the construction and
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	<p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>operational phase of this project. Please refer to the Estuarine Ecology study (refer to Appendix D) completed by Anchor Environmental in order to inform the proposed powerline development within the estuarine functional zone on a detailed level. Further, please refer to the updated EMP (Appendix F) which has been adjusted to provide fine-scale environmental management of the proposed powerline corridor during the construction phase, in order to mitigate any impacts on sensitive areas and ecosystems.</p> <ul style="list-style-type: none"> - Noted. As per EMP (page 12, refer to Appendix F) all alien vegetation will be removed in the prescribed manner from the proposed powerline corridor as well as the substation site. Please refer to the Estuarine Ecology study (Appendix D) and the EMP (refer to page 13, Appendix F) for a detailed assessment on the impacts and mitigation measures associated with the founding of pylon towers in the estuarine functional zone. - Noted. Please refer to the Estuarine Ecology study, as requested, in Appendix D. - Noted. Please refer to the EMP (page 12 and 15, Appendix F) where it is clearly stated that prior to any species removal listed in Schedules 3 and 4, a permit must be obtained from CapeNature. - Noted. Please refer to the above-mentioned documentations which have been requested by CapeNature. The Basic Assessment Report is compliant with all requests as stated, and all concerns have been addressed as required. <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>DEA: Marine and Coastal Management 2 East Pier Shed, East Pier Road V&A Waterfront Cape Town (Oceans and Coasts Branch)</p> <p>Chief Directorate - Integrated Coastal Management: Dr Razeena Omar Tel: 021 819 2432 Email: romar@environment.co.za Case Officer: Ms. Thilivhali Meregí Tel: 021 819 2494 Email: tmeregi@environment.gov.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>09/05/13: Email received from Thilivahli Meregí providing the following comments:</p> <ul style="list-style-type: none"> - “According to the Principles of NEMA (Act 107 of 1998), developments which requires the consideration of all relevant factors that include the following: <ul style="list-style-type: none"> i. That the disturbance of ecosystem and loss of biological diversity is avoided, or, where they cannot be altogether avoided, are minimised and remedied. ii. That pollution and degradation of the environment are avoided, or where they cannot be altogether avoided, are minimised and remedied. - It is also important to take into account the sensitivity,

		<p>vulnerability of ecosystems such as coastal shores, estuaries and wetlands especially where they are subjected to development pressure.</p> <ul style="list-style-type: none"> - We have concerns on whether the changes in floodline were taken into consideration. The Situation Assessment Report recommended that no new developments should take place within the risk area – this could be the 1:100 year floodline or below the 5m contour. - The DBAR does not mention any possible impacts of climate change, noting that the development will be situated close to the floodline of the Bitou River. You are advised to note that Section 63 of ICMA (Act 24 of 2008) lists certain aspects to be considered when dealing with Environmental Authorisations. One of these aspects is that any coastal development should take into account the possible impacts of coastal environmental processes on the proposed activity and this had to take into account the cumulative effect of the impact. - It will be of importance to consider that the Bitou Estuary has a wide floodplain connected to the estuary by numerous tidal creeks and the largest area of salt marsh occurs on these floodplains. The Present Ecological State (PES)- Category A/B and the area in terms of Ecological Importance and Sensitivity (EIS) is very high. - Considering the above, during the Construction phase there are things that need to be considered and these are: <ul style="list-style-type: none"> i. Indicate the methods to be used during the installation of power lines that will outline the process to avoid trampling on the estuary salt marshes ii. It is also important to give clear details on the mitigation measures that will be taken to minimise damage to the estuarine vegetation. - According to the gazetted National Estuarine Management Protocol an estuary must be managed to avoid, minimize or mitigate significant negative impacts but are not limited to reduce water flows and loss of habitat or species. Any developments of the estuary must maintain the current ecological state. - The coordinates provided on the report when plotted on GIS indicate that the proposed overhead powerline is 6.4km and not 2.5km. Again in the activity description the approximate proposed overhead is 5km – clarity is required on how much kilometres the activity will occupy. - The Situation Assessment Report (Keurbooms/Bitou) indicates about 29 fish species and sea horse might reside in these estuaries. A study might be useful in understanding the impacts of the development on fish. The avifauna study indicated the importance of wetland to birds but the mitigation measures are very limited and brief. - It is strongly recommended that the proposed activities should be undertaken in a manner that will minimize negative
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		<p>impacts to the coastal environment and must take into account the Duty of Care provisions in Section 28(4) of NEMA (Act 107 of 1998).</p> <p>19/06/13: SiVEST responded:</p> <ul style="list-style-type: none">- Noted. The proposed substation and pylon sites within the Estuarine Functional Zone were selected based on minimal disturbance to surrounding habitat, and are placed on areas of degraded and alien-infested habitat. Further, site-specific mitigation measures, specifically pertaining to the Keurbooms Estuary are included in the EMP (Appendix F) to minimise the impacts of the proposed development on the environment. An Estuarine Ecological report (Appendix D) was conducted in order to assess the impact of pollution and erosion on the estuary. The report found that with site-specific mitigation measures, the impacts can be mitigated to low or insignificant levels. These mitigation measures are detailed in the EMP (Appendix F).- Noted. An Estuarine Ecological report (Appendix D) was conducted in order to assess the impact of the proposed development on the sensitive estuarine habitat surrounding the substation site and pylon. The report assessed the impacts on the estuarine environment, including the impact of the proposed overhead powerline on bird collisions and electrocution. The report concluded that the impact of the proposed development can be mitigated to low levels with site-specific mitigation measures, as set out in the EMP (Appendix F).- Noted. The floodline was taken into consideration, as the substation and pylon lie on the 3m contour. The Estuarine Ecological report (Appendix D, page 11-12) assessed the potential impacts of climate change, including increasing flood events, on the substation and pylon. The report concluded that the short duration day rainfall will not increase significantly over the next 100 years and the long duration day rainfalls are projected to increase by 10% in the Keurbooms Estuary and surrounds. Overall, the report suggests that the impact of climate change on flows is not likely to impact significantly on water levels and flood events compared to current levels.- Noted. Please refer to the response to comment 2 above with regards to climate change and possible changes in rainfall and flood events. Additionally, the rise in sea level due to climate change was also assessed in the Estuarine Ecological report (Appendix D, page 11-12). It was concluded that due to the site's location 2.5km upstream of the estuary mouth it is very unlikely that the site will be affected by erosion or rising waters due to sea level rise in the next 100 years.
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		<ul style="list-style-type: none">- Noted. Please refer to the detailed Estuarine Ecological report (Appendix D) as well as the detailed EMP (Appendix F) for the impact assessment and mitigation measures in place to ensure that the impact on the ecological sensitive estuary is minimal.- Noted. The proposed substation and pylon within the EFZ will not be located near the estuarine salt marsh. Both structures are located in terrestrial habitat that has been classified as degraded fynbos (refer to Estuarine Ecological report, Appendix D, pages 5-7). In order to protect any terrestrial and estuarine habitat, the areas immediately surrounding the substation and pylon sites will be declared "no-go" areas during the construction and operational phases (refer to EMP, Appendix F, page 10). The proposed access tracks will lead over terrestrial habitat and will be strip tracks (refer to EMP, Appendix F, page 10 and 14) to minimize disturbance on the surrounding environment and prevent erosion. The powerline stringing will be conducted by shooting a guiding string across the estuary and using a pulley system on pylons on either side of the estuary to string the powerline. This method will prevent any machinery, equipment or materials from disturbing or entering the salt marshes or waters of the estuary. As per Estuarine Ecological report (Appendix D, pages 5-7) the vegetation at the substation and pylon sites is classified as degraded fynbos and is not estuarine in composition. As stipulated above, detailed measures to avoid damage to vegetation surrounding the sites as well as minimizing vegetation disturbance during access track construction/operation, can be found in the EMP (Appendix F).- Noted. Please refer to the Estuarine Ecological report (Appendix D) for a detailed impact study and recommended mitigation measures (implemented into the EMP, Appendix F) to minimise the impact on the estuary. The report indicates that identified impacts, including habitat loss, erosion, pollution of estuary, alien vegetation establishment, bird electrocutions and bird-powerline collisions can be mitigated to low or insignificant levels respectively. It is therefore highly likely that the current ecological state of the estuary will not be affected by the proposed substation and powerline.- Noted. The coordinates have been amended to reflect the 2.5km line which has been applied for with the Department of Environmental Affairs. Please refer to Section A, subsection 3 in the Final BAR for amended coordinates.- Noted. The Estuarine Ecological report (Appendix D) addressed impacts associated with the potential disturbance of the estuarine aquatic habitat, including pollution and run-off of the estuarine waters as well as erosion which may change the turbidity of the water. Site-specific mitigation measures
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	<p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>have been implemented in the EMP (Appendix F) to mitigate the above-mentioned impact to low/very low/insignificant levels. As detailed in response 6, the stringing of the powerline will not affect the estuarine salt marshes or the estuarine waterbody. Based on this information, we do not believe that a study on the impacts of fish is necessary.</p> <p>The impacts of the proposed development on avifauna is detailed in the Estuarine Ecological report (Appendix D, pages 20-23) with detailed impact assessments and mitigation measures. It was noted in the report that the bird-powerline collision as well as electrocution by perching on powerlines/pylons poses a significant impact on water birds in the area. Mitigation measures include the use of daytime and nighttime bird flappers that will reduce the direct impact of bird-powerline collisions from high to low with a medium cumulative impact. The issue of electrocution is proposed to be mitigated by allowing for large enough air-gaps between conducting elements and metal work as well as conductors to prevent even large birds, such as the African Fish eagle to perch on the structures.</p> <ul style="list-style-type: none"> - Noted. The Estuarine Ecological report (Appendix D) which was an additional study conducted in May/June 2013, has significantly improved the understanding of the impacts caused by the proposed development. The addition of site- and estuary-specific mitigation measures from this specialist report into the EMP (Appendix F) allows for a significant reduction in impacts on the estuarine environment. It is therefore highly likely that the current ecological state of the estuary will not be affected by the proposed substation and powerline. <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>Heritage Western Cape Department of Cultural Affairs and Sport 3rd Floor, Protea Assurance Building Greenmarket Square Cape Town 8000</p> <p>Jenna Lavin/Troy Smuts Tel: (021) 483 9685 Fax: (021) 483 9842 Email: Jenna.Lavin@pgwc.gov.za/ Justin.Bradfield@westerncape.gov.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation (NID) delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>07/05/13: Letter received from Mr. Troy Smuts with the following comment:</p> <ul style="list-style-type: none"> - HWC comment with regards to the Robberg-Bitou Powerline dated 6 March 2007 still stands and no further heritage studies are required. <p>05/06/13: SiVEST responded:</p> <ul style="list-style-type: none"> - Noted. The HWC response dated 6 March 2007 has been included in the Comments & Response section of the Final BAR (Appendix E).

	1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.	24/07/13-16/08/13: Final BAR PPP
<p>DEA&DP Directorate Land Management (Region 3) Department Environmental Affairs and Development Planning 4th Floor, York Park Building, 93 York Street, George</p> <p>Renetta Roets Tel: (044) 805 8630 Fax: (044) 874 2423 E-mail: roets@pgwc.gov.za</p>	2X Hardcopies and CD of DBAR, EMP and supporting documentation delivered for comment and review.	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>4/10/12: Ms. Renetta Roets on behalf of DEA&DP contacted SiVEST requesting an electronic copy of the Draft BAR and EMP. SiVEST responded with the requested electronic documents. Ms. Roets confirmed receipt of the electronic documents</p> <p>15/11/12 SiVEST contacted Ms. Roets via email to request on the status of the outstanding comments from the Department.</p> <p>3/12/12 SiVEST contacted Ms. Roets again to request comments from the Department.</p> <p>15/01/13: Fax received from Renetta Roets with the following comments:</p> <ul style="list-style-type: none"> - “The Department is concerned about the construction of the proposed substation within the estuary functional zone. This area is also located within a CBA and ESA in terms of the fine scale biodiversity conservation maps of the region. All the recommendations as contained in the various specialist reports must be included as mitigation measures to minimize and prevent any potential negative impacts on the estuarine environment.” - “It is further recommended that the application be submitted to an estuarine ecologist for further review and advice, with respect to the mitigation measures that must be considered from an ecological perspective. - “The Department is also concerned about the fact that the required pylon towers that are to be installed within the estuary functional zone have not been part of the geotechnical investigation. Mitigation measures to prevent/minimize impacts on the estuary must be expanded on, as informed by an estuarine ecologist and also be included in comprehensive detail in the EMP. Detailed method statement and design drawings should be requested to be included in the EMP.” <p>05/06/13: SiVEST Responded:</p> <ul style="list-style-type: none"> - Noted. Please refer to the EMP in Appendix F, which contains detailed mitigation measures as per the specialist reports in Appendix D. An Estuarine Ecology report (refer to Appendix

	<p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>D) has also been compiled by an independent specialist, that further informs detailed mitigation measures within the EFZ.</p> <ul style="list-style-type: none"> - Noted. Please refer to the Estuarine Ecology study (refer to Appendix D) completed by Anchor Environmental in order to inform the proposed powerline development within the estuarine functional zone on a detailed level. Detailed mitigation measures, based on the Estuarine Ecology report, have been included in the EMP (refer to page 13, Appendix F). - Noted. As per Estuarine Ecology report (Appendix D), a detailed study in terms of the impact of the proposed pylons on the EFZ has been conducted and detailed method statements compiled. Detailed mitigation measures, as per the Estuarine Ecology report, have been added to the EMP (refer to page 13, Appendix F). <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>Department of Water Affairs 52 Voortrekker Road Bellville 7530</p> <p>Gouritz Water Management Area</p> <p>Lameez Salim Tel: 021 941 6180 Email: HendricksL2@dwa.gov.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p> <p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>04/10/12:</p> <ul style="list-style-type: none"> - SiVEST emailed Mr. Lameez Salim requesting comment from DWA - Mr. Salim confirms to SiVEST that the DBAR was not received despite proof by SiVEST that the DBAR was delivered to the Department on June 22, 2012. <p>16/10/12:</p> <ul style="list-style-type: none"> - SiVEST phoned Mr. Salim and followed up with an email confirming that DWA will receive a Final BAR to comment on. <p>24/07/13-16/08/13: Final BAR PPP</p>
<p>Department of Agriculture Land-use Manager Department of Agriculture: Western Cape Private Bag X 1 Eisenburg 7606</p> <p>Mr Cor van der Walt Tel: 021 – 808 5093 Email: landuse.eisenburg@eisenburg.com</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p> <p>1X Hardcopy and CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP</p> <p>26/04/13: SiVEST contacted the Department of Agriculture requesting comment on the Draft BAR. The Department opted to await the Final BAR for comment.</p> <p>24/07/13-16/08/13: Final BAR PPP</p>

<p>Department of Forestry Private Bag X12 Knysna 6570</p> <p>Cobi Vermeulen TEL: (044) 302 6900 Fax: (044) 382 5461 Email: cobriv@daff.gov.za</p>	<p>1X Hardcopy and CD of DBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>22/06/12 – 01/08/12: Draft BAR PPP 08/08/12: Email received from Cobi Vermeulen stating the following:</p> <ul style="list-style-type: none"> - "Section 7 of the NFA provides for the prohibition of the destruction of indigenous trees in any natural forest (26 National Forest Types have been declared as natural forest in terms of Section 7(3)(a) of the NFA, Government Notice No. 762, 18 July 2008) and Section 15 for the prohibition of the destruction of Protected trees (Government Notice No 734, 16 September 2011), without a license. Principle 3 3(a) of the NFA states, "natural forests may not be destroyed save in exceptional circumstances where, in the opinion of the Minister, a proposed new land use is preferable in terms of its economics; social or environmental benefits". The term "exceptional circumstance" indicates situations that are unusual or rare. It refers to capital projects of national and provincial strategic importance". - "The flat portion of the proposed Substation site is almost entirely transformed and invaders such as Acacia mearnsii occur. DAFF has no objection to this part being developed on condition that there is compliance with all other relevant Environmental Laws". - The steep cliff above the proposed Substation site is covered with remnants of Southern Cape Afrotropical Forest (VEGMAP CODE FOz 13) with one very old Syderoxylon inerme (Milkwood) tree at the foot of the cliff. The slope/cliff and its vegetation must not be disturbed at all and measures must be taken to ensure the stability of this slope/cliff. The slope/cliff area must be demarcated and fenced during construction. - "It was stated by the Environmental Consultant during the site inspection as well as mentioned in the documentation that the Milkwood at the foot of the cliff must be removed to construct the Substation. This tree is protected under Section 7 as well as Section 15 of the NFA. DAFF do not support the removal of this tree (see point 3) and a licence to remove it may only be considered if it could be proved without any doubt that no other option is available. The removal of this tree will also have a huge impact on the stability of the slope/cliff which will again have a negative influence on the remnants of Southern Cape Afrotropical Forest". - Due to clearance infringements to the new incoming line and other structures associated with the Substation, the tree can be retained. However, 50% of the tree's area overhanging the area where the line will pass will have to be trimmed. This has been approved on site by Mrs. Cobri Vermeulen on April 24, 2013. Please refer to Appendix G for an Application for a License regarding Protected Trees (in terms of Section 15(1) of the National Forests Act, 1998, (as amended)). The listed
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	<p>1X Hardcopy and CD of FBAR, EMP and</p>	<p>activity applicable: "Prune or de-limb of individual trees". This application was lodged with Mrs. Cobri Vermeulen of the Department of Forestry on March 21, 2013 via email.</p> <ul style="list-style-type: none"> - "The provisions of the NVFFA do not apply to this". <p>21/03/13: SiVEST submitted the Tree License application, as requested by DAF, via email to Cobri Vermeulen. Mrs. Vermeulen subsequently requested a site visit with SiVEST and Eskom in order to clarify the amount of tree to be trimmed.</p> <p>24/04/13: Representatives of SiVEST, Eskom and Department of Forestry (DAF) met at the proposed substation site C to discuss the trimming of the milkwood tree on the cliff face south-east of the proposed substation site. DAF confirmed that the tree may be trimmed with a DAF specialist present on site, and that the Tree License applied for with DAF will be granted.</p> <p>05/06/13 SiVEST responded:</p> <ul style="list-style-type: none"> - Noted. Please refer to the completed Tree Permit Application submitted to the Department of Forestry on March 21, 2012 (Appendix G) as well as our response to your comment 4 below. - Noted. Compliance with all other relevant environmental laws will be ensured. - Noted. Vegetation at the foot of the cliff shall not be disturbed. The area shall be demarcated and fenced off during construction and will be regarded as No-Go areas, as per EMP (refer to page 10, Appendix F). - Noted. Eskom has confirmed that the Milkwood tree located at the foot of the cliff will not have to be removed. By retaining this tree, the stability of the slope/cliff will be ensured. Remnants of Southern Cape Afrotropical Forest will therefore also not be negatively impacted upon. Due to clearance infringements to the new incoming line and other structures associated with the Substation, the tree can be retained. However, 50% of the tree's area overhanging the area where the line will pass will have to be trimmed. This has been approved on site by Mrs. Cobri Vermeulen on April 24, 2013. Please refer to Appendix G for an Application for a License regarding Protected Trees (in terms of Section 15(1) of the National Forests Act, 1998, (as amended)). The listed activity applicable: "Prune or de-limb of individual trees". This application was lodged with Mrs. Cobri Vermeulen of the Department of Forestry on March 21, 2013 via email. - Noted. <p>24/07/13-16/08/13: Final BAR PPP</p>
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	supporting documentation delivered for comment and review.	
<p>Plettenberg Bay Community Environment Forum Postnet Suite #38, Private Bag X1006, Plettenberg Bay 6600</p> <p>Chrissie Cloete Tel: (044) 533 5824 Cell: 082 064 6645 E-mail: eforum@mweb.co.za</p>		<p>29/06/12: Ms. Chrissie Cloete on behalf of the PBCEF requested to be registered as an I&AP</p> <p>02/07/12: SiVEST responded, confirming that PBCEF is a registered I&AP</p> <p>18/07/12: Ms. Chrissie Cloete informed SiVEST that the DBAR documents were hard to download off the SiVEST website.</p> <p>20/07/12: SiVEST proposed to mail a CD containing the DBAR and EMP to PBCEF. Ms. Chrissie Cloete acknowledged this.</p> <p>28/07/12: Email received from Chrissie Cloete stating the following: Sense of Place:</p> <ul style="list-style-type: none"> - The visual impact of galvanised steel pylons is all too obvious and will most certainly destroy the Sense of Place. It is proposed that Eskom's latest low profile design for Substations will be used to ultimately minimise the visual impact. - PBCEF questions the negative impact that the proposed power line will have on the birds in the area, tourism and related birding. - The Bitou Valley Project is about to be launched and focuses on the establishment of Wittedrift, the Bitou Wetland and surrounds as an eco-tourism hub. The visual impacts and potential impacts on birds will have negative consequences for this. - It was also said in the draft BAR that "<i>the changing visual context in the area with the increase in housing and the proposed new N2 bypass will also alter the visual context over time in a way that will reduce the visual impacts</i>". This is an assumption and cannot be considered a relevant 'excuse' for impacting the EXISTING aesthetics and sense of place. Any future development in this area will need to go through the required processes. It cannot be assumed that the N2 bypass will happen or that there will be increased development in the area under question. <p>Environmental Impact:</p> <ul style="list-style-type: none"> - The Bitou Valley has been identified as a wetland area which requires special conservation attention. The powerline will have a severe impact on the wetland area where, already declining numbers of resident and migratory bird species are especially at risk. - The impacts of the electro-magnetic fields from such an

		<p>overhead powerline on people, animals and the immediate environment are not fully understood but there are many worrying reports of the exposure to these. More investigation of this is required.</p> <ul style="list-style-type: none"> - With reference to The Western Cape Provincial Spatial Development Framework regarding coastal (includes estuaries) development and floodlines - Site C was not flooded in the recent past, it is still below the flood line and Climate Change will increase the severity of storms and floods in the future. <p>Need and Desirability:</p> <ul style="list-style-type: none"> - Plettenberg Bay does not have adequate water supply and will most probably not have in the future unless we drastically interfere with the ecological health of the river and catchment systems. Can we assume that a feasibility study and needs analysis has been undertaken for this proposal? - The Draft BAR refers to Local Economic Development Strategy compiled by Urban-Econ (2011) for the Bitou Municipality but development outside of existing development nodes is contrary to the PSDF. - In the Draft BAR reference is made to the proposed development being situated within the urban edge. PBCEF is unaware of any approved urban edge. This has been a point of contention between Local and provincial authorities and we have been informed that a public participation process in this regard is still to be implemented <p>Vegetation:</p> <ul style="list-style-type: none"> - "Site C is a flat area framed by steep cliffs and foothills and contains Garden Route Shale Fynbos and Southern Afrotropical Forest. It is home to <u>"the most intact vegetation community within the Route 4 / Site C study area"</u> and has been identified as being <u>"of high conservation value"</u> as stated in the Botanical Survey by Ross C. Turner (2008) in Appendix D. There is also a protected species of Milkwood located on the property," - The Bitou River System plays a role in the ecology of the Bitou area as a major environmental corridor. What impact are the lines and servitudes going to have on this ecological corridor? - The Portion of route 4 between Old Nick and New Horizon has a conservation value of "moderate to high, given extensive alien clearing and follow-up in the immediate future" as stated in the Botanical Study (Ross C Turner, 2008). Alien clearing needs to happen regardless whether the powerline will be erected there or not. The presence of alien vegetation should not be used as an excuse to develop a piece of land but rather any development should enhance the vegetation. - We also object to any disturbance or activities that will have a negative impact on the very sensitive salt marshes of the Bitou River System. Immediately South of Site C is Cape
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		<p>Estuarine Salt Marsh. The proper functionality off the estuary is crucial for the management of floodwaters, especially seeing that the proposed sub-station is to be located approximately 8m. a.s.l.</p> <ul style="list-style-type: none"> - It is apparent from the specialist report that the site contains a mix of vegetation types making management of the area fairly complex. Taking the different vegetation communities into consideration the Forum objects to the removal/disturbance of any indigenous vegetation including protected species i.e. Milkwood trees, which are present in this area. <p>Impact on Birds:</p> <ul style="list-style-type: none"> - As noted in the Bird Impact Study specialist report (by Andrew Jenkins, 2008), the Bitou River System is an important area for birds and birding alike. The Avian Demography Unit's 'Coordinated Waterbird Counts' (CWAC) project notes that the Bitou River System supports populations that are locally significant. The proposed Powerlines are going to have a negative impact on the birding communities on more than one level affecting the birds themselves and possibly bird tourism in the area. - As depicted from the Draft BAR, medium negative short term disturbance of breeding or foraging areas during construction is foreseen but PBCEF identifies that depending on the species and the season of construction that this impact can be less or more and could be more long term. - Some species found in the area are endangered or threatened and the Bitou wetland cannot afford the loss of its most valuable assets, birds. - It is highly important that Eskom should consult with the Endangered Wildlife Trust's Wildlife and Energy Programme regarding this application before any further activities are undertaken. <p>Other Alternatives:</p> <ul style="list-style-type: none"> - PBCEF recommends that the cables be put underground along the road from the vicinity of Penny Pinchers to the substation to nullify the substantial threat to birds flying across from the lagoon to the wetland. - PBCEF questions why has the alternative of erecting the pylons on the bridge or next to it not been considered? - PBCEF objects the power line going through the Bitou River system. - PBCEF objects to the proposed development until further appropriate alternatives have been identified or considered and a holistic feasibility study and needs analysis is conducted which includes the availability of water for the area and "future development" refer to in the Draft BAR. <p>30/09/12 Ms. Cloete contacted SiVEST to enquire about the progress of the Final BAR and answers with regards to the comments provided by the</p>
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		<p>PBCEF in July 2012. Ms. Cloete also enquired whether all I&AP's, including the individuals from Routes 1-3 were informed of the project.</p> <p>01/10/12 SiVEST responded: SiVEST noted that not all government departments had provided comment yet and that all comments will be responded to and sent out with the Final BAR in due course. SiVEST further clarified that the I&AP's of Route 1-3 were not included in the notifications as those Routes received an EA in April 2010. Only Route 4B is part of the new Application for the current project however all I&AP's of Route 4 (A and B) were notified for transparency. SiVEST re-iterated that Ms. Cloete can provide any interested individuals with the SiVEST contact details.</p> <p>Ms. Cloete acknowledged receipt of SiVEST's response.</p> <p>18/06/13 SiVEST responded to the PBCEF's comments: Sense of Place</p> <ul style="list-style-type: none">- Noted. Please note that the Visual Impact Assessment (Appendix D, Final BAR) rates the overall visual impact of the substation and powerline medium-low after mitigation. Only the visual absorption capacity of the substation is rated as medium-high after mitigation. However, as noted in the report, the ratings are reversed for this impact, meaning "low" is considered problematic and "high" considered desired. Therefore, the visual absorbency of the substation is considered "desired" due to the vegetation cover and ridgeline surrounding the site. The current low profile design for the substation will ensure minimal visual impact. Further mitigation measures to decrease the visual impact of the substation were considered but after further investigation not termed feasibly for the following reasons:<ul style="list-style-type: none">(i) Screening via trees not viable due to the fire hazard and safety considerations as per OHS Act. Due to fire risk, risk of theft and vandalism if hidden, vegetation cannot be planted around the substation.(ii) Substation sites further away from the N2 (on the R340) were considered but termed not feasible due to the high flood levels present and increased sensitive areas for birdlife and wetland ecosystems. <p>In terms of material usage for the pylons, wooden pylons may be more appropriate in terms of blending into the environment, however Eskom will use steel monopole due to:<ul style="list-style-type: none">(i) in order to extend the lifespan of the power line(ii) the waterlogged soils requires a stronger structure and foundation(iii) Steel poles can span longer lengths, therefore fewer structures required, hence less overall environmental footprint and impact.</p>
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		<ul style="list-style-type: none"> - Noted. In terms of impact on bird habitat and birding, the impacts are considered low after mitigation in terms of destruction of nesting, breeding and perching habitat as per the Estuarine Ecological Assessment (Appendix D, Final BAR). The substation site as well as the single pylon site which will be located within the EFZ was classified as degraded with little conservation value due to alien vegetation infestation. Both sites were identified as unlikely bird habitat (Estuarine Ecology report, Appendix D, page 7). Therefore the impact on terrestrial bird habitat is minimal. However, the largest impact on birds was identified as collisions with powerlines as well as electrocution of larger birds which may be capable of spanning the air gaps between conductors (page 20-23, Estuarine Ecology report, Appendix D). The specialist recommends the use of day and night deflectors to mitigate bird-powerline collisions and the use of large air gaps to prevent electrocution. Overall, the impact of the powerline and substation on bird species post-mitigation was rated as low with proper operational phase management in place, as per Estuarine Ecology report (Appendix D) and the Environmental Management Plan (page Appendix F). In terms of the powerline's visual impact to bird viewers and associated tourism opportunities, it may be noted that the overall visual impact of the proposed substation and powerline is rated as medium-low. The structures will be constructed through a low-profile. - Noted. Please refer to the above responses in terms of visual impacts and bird-related impacts. The proposed substation and powerline are designed to minimize the visual and ecological impact to the area. The development of the substation and powerline is necessary to support any further growth of the Plettenberg Bay economy, which would include any electricity demands the eco-tourism industry requires. - Noted. It may be noted that the Visual Assessment report (Appendix D) states the following in the executive summary: "The overall significance of the visual impact has been rated at medium-low for both the substation and the transmission lines with full mitigation. This is considered acceptable within the local context. The visual impacts fall within the accepted norm for this type of development and therefore, in terms of visual issues it is recommended that the development be authorized subject to the implementation of the mitigation measures." Further, the powerline has been designed with the construction of the future N2 overpass in mind (refer to Locality Plan, Appendix A). <p>Environmental Impact</p> <ul style="list-style-type: none"> - Noted. Please refer to the Estuarine Ecology report (Appendix D) for a full impact assessment on the Estuarine Functional Zone for the construction of the proposed substation and powerline. The substation and pylon sites were evaluated by
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		<p>the specialist and deemed degraded. The sites are infested with alien vegetation species and the natural vegetation remaining is not of estuarine type but degraded fynbos. The sites were classified as being of little conservation value by the specialist (page 5-7, Estuarine Specialist report, Appendix D). As stated in the Estuarine Ecology report's (Appendix D) impact section (pages 12-19), the impacts of habitat destruction, pollution, erosion and further alien vegetation establishment in disturbed areas, are considered low to insignificant with appropriate mitigation measures. Further, the powerline will be strung without coming in contact with any components of the estuarine habitat. Collision and electrocution of birds is a concern with this development, however, as stated in the Estuarine Ecology report (Appendix D, page 20-23) these occurrences can be mitigated to low levels with specialized bird flappers and appropriately large air-gaps between conductors.</p> <p>The Avi-Fauna report (Appendix D) further states that: "...Route 4 is undoubtedly the preferable option. It crosses the Bitou River floodplain at a fairly narrow point, with <500m of contiguous, open wetland exposed to the line at that point...". Numbers of waterbirds flying into and out of this pan area are likely to be particularly exposed to collision with an overhead line traversing its immediate eastern fringe. Route 4 runs along the N2 for well over half its length, running parallel with existing power and telecoms infrastructure and within the heavily disturbed road reserve. It also crosses the least amount of natural Fynbos and forest habitat, which support the highest diversity of endemic species, and the second highest diversity of 'priority' species respectively." Based on the specialist reports above, the impact on the wetland area is rated as low for the construction and operational phases of this proposed development, and is therefore not likely to hinder conservation efforts of the Keurbooms Estuary.</p> <ul style="list-style-type: none"> - Noted. In the design, construction and operation of its power lines, Eskom conforms to the provisions of the Occupational Health and Safety Act (OHSA), 85 of 1993, and the health and safety standards set by the International Radiation Protection Association. Eskom is also a member of the National Electro Magnetic Fields (EMF) Forum of South Africa, which was established in association with the Department of Health. This Forum comprises various organisations and authoritative bodies in South Africa. Its objective is to discuss the findings of both national and international research on EMFs. To date, no studies conducted nationally and internationally support the suggestion that the exposure to EMFs from power lines pose a risk to human health. - Noted. Please refer to the C.A.P.E Estuary Management Plan
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		<p>(2010), Section 2.2 on The Extent of the Estuarine Areas. The document states that the coastal protection zone at the 1:50, 1:100 or 1:1000 floodline buffer zone is “designed to restrict certain activities that may interfere with the estuary and it’s sensitive riparian areas, but it does NOT mean that no activities may take place. Activities that should be restricted, or at least asses prior to authorization are those listed in the...EIA Regulations.” Activities within the 100m High Water Mark trigger the EIA Regulations (2010, as amended) with this proposed development hence it is undergoing the required Basic Assessment Process as stipulated by the National Environmental Management Act (Act 107 of 1998). Further, please refer to Section 63(3) of the Integrated Coastal Management Act (Act 24 of 2004) which allows for competent authorities to issue an Environmental Authorisation if the nature of the development requires it to be located within coastal public property or if the development will provide important services to the public. Basic service provision, such as adequate electricity supply, is an important public service.</p> <p>All available site alternatives in the demand area where the substation is required were flooded and well below the floodline. The preferred Substation Site C is 3.9 meters above sea level which is 0.4m higher in elevation than the N2 bridge. It is noted that the pylon in the EFZ is below the 5m contour line however, the potential flood risk and impact of climate change on flood risks has been taken into consideration during the design of the substation and the pylon (refer to the Estuarine Ecological report, Appendix D, page 11-12).</p> <p>Need and Desirability</p> <ul style="list-style-type: none">- Noted. The feasibility in terms of electricity demand and supply for the Plettenberg Bay area was conducted by Eskom subsequent to the request by the Plettenberg Bay Municipality to increase its NMD (Notified Maximum Demand). Eskom advised the Plettenberg Bay Municipality that they cannot allow any further increase in their NMD until the electricity networks in the area are strengthened, hence the need to construct Bitou Substation and associated feeders. It is the mandate of the Plettenberg Bay Municipality to conduct a Strategic Environmental Assessment to identify environmental constraints and opportunities and address aspects critical such as water supply and river health.- Noted. Although the Plettenberg Bay CBD is most stressed in terms of electrical supply, a substation will not only supply the CBD areas, but the farm feeders as well. The entire Plettenberg Bay area is stressed from an electrical supply point of view. Also it must be noted that the location of a substation outside an urban area or development node may not indicate that the proposed development is contrary to the Local Economic Development Study or the PSDF. A
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		<p>difference between development types, e.g. housing, industrial nodes, essential infrastructure for service supplies, must be made.</p> <ul style="list-style-type: none"> - Noted. The Provincial Department of Environmental Affairs and Development Planning was contacted with regards to the urban edge. As pointed out by you, a dispute is ongoing with regards to the location of the urban edge. In order to ensure compliance with all NEMA EIA Regulations (2010, as amended), the proposed development is treated as being outside the urban edge. This is reflected in the Final BAR and the corresponding Listed Activities applied for with DEA. <p>Vegetation</p> <ul style="list-style-type: none"> - Noted. As per the Botanical Specialist report (Appendix D) Section 1.2 pages 15-16, the specialist described Substation Site C as follows: "This site has been almost entirely transformed by past construction of the N2 highway, is of low conservation priority, and is infested with adult plants of <i>Acacia mearnsii</i>". This statement is further confirmed by the Estuarine Ecology report (Appendix D) on page 5 which states that the site is "severely degraded" and has "little conservation value". It may be noted that the cliffs surrounding Substation Site C are indeed covered in Garden Route Shale Fynbos and Southern Afrotemperate Forests, however this identified vegetation will be designated as "no-go areas" as per the EMP (Appendix F, page 10). Part of the canopy of the Milkwood located on the cliff's edge at Substation Site C will be within the powerline corridor. 50% of the tree's area overhanging the area where the line will pass will have to be trimmed. This has been approved on site by Department of Forestry on April 24, 2013. Please refer to Appendix G for an Application for a License regarding Protected Trees (in terms of Section 15(1) of the National Forests Act, 1998, (as amended)). The listed activity applicable: "Prune or de-limb of individual trees". This application was lodged with the Department of Forestry on March 21, 2013 (refer to Appendix G). - Noted. Please refer to the Estuarine Ecology report (Appendix D) for detailed impact assessments of the proposed development on the Keurbooms Estuary. Further, servitudes inherently act as biodiversity corridors. Due to the land use restrictions servitudes impose on land owners, their inability to build or develop within the servitudes prevents the loss of natural vegetation and encourages ecological connectivity which is vital to biodiversity corridors. Eskom distribution specifically does vegetation management within its servitudes in a manner that promotes connectivity and only trims where vegetation encroaches the safety clearance area. Please refer to the EMP (Appendix F) for full operational vegetation management of powerline corridors. - Noted. During the planning stages of any proposed
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		<p>development, areas of low conservation value or degradation/transformation are identified in order to place pylons in areas where the least amount of natural vegetation loss/habitat loss will occur. These areas are often alien vegetation patches where indigenous plant species have been eradicated. Eskom employs a comprehensive alien clearing programme to ensure that powerline corridors remain of ecological importance and can function as ecological corridors. Eskom does not conduct alien clearing outside of designated powerline servitudes/corridors.</p> <ul style="list-style-type: none"> - Noted. The proposed Substation Site C and the only pylon within the Estuarine Functional Zone, pylon B16, are not located within Cape Estuarine Salt Marsh. According to the Estuarine Ecological report (Appendix D, page 5-7) both sites are located in terrestrial ecosystems which can most closely be identified as Garden Route Shale Fynbos, however the sites are highly degraded and of little conservation value. Please note that the intact vegetation systems and Salt Marsh/Estuarine areas in the proximity of the proposed development sites will be designated "no-go areas" during the construction phase (refer to EMP, Appendix F, page 10). Other impacts such as erosion and pollution will be mitigated to insignificant levels as per Estuarine Ecological report (Appendix D) and the EMP (Appendix F). Therefore, the proposed development will have a negligible influence on the functionality of the estuary. - Noted. The proposed substation site as well as the pylon within the EFZ is located on degraded land where little indigenous vegetation remains. Areas outside of the immediate footprints at which construction is to take place will be designated "no-go areas" (refer to EMP, Appendix F). Removal or destruction of indigenous vegetation will be kept to an absolute minimum. Should any endangered or threatened species require transplantation or removal the appropriate permits will be acquired from CapeNature (refer to EMP, Appendix F, page 12 and 15). As stated above, Milkwood trees will not be removed. One milkwood tree will require trimming, for which a license has been applied for with the Department of Forestry (refer to Appendix G) and the trimming will be supervised by DAF personnel. <p>Impacts on Birds</p> <ul style="list-style-type: none"> - Noted. Please refer to the recently conducted Estuarine Ecology report (Appendix D) which conducted a detailed study on water bird powerline collisions within the Keurbooms Estuary as well as the impact of bird electrocution when perching on powerlines or pylons. Note that significant technological advances have been made since Andrew Jenkins' report in 2008. The Estuarine Ecology report (Appendix D) suggests the use of both day and night bird flappers which will decrease the impact rating of bird collisions
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		<p>from high to low after mitigation (page 20-22). Please refer to Response 1 under "Environmental Impact" for a detailed response on your comment.</p> <ul style="list-style-type: none"> - Noted. Where possible, the construction of the proposed substation and pylons will be adjusted to be outside the breeding seasons of identified water birds. - Noted. Please refer to Response 1 under "Environmental Impacts" and Response 12 under "Impacts on Birds" for a detailed explanation on the mitigation measures with regards to the impacts on water birds. - Noted. Eskom and the Endangered Wildlife Trust (EWT) has a long-standing partnership, through which research and development of new bird diverters and technologies and work together on bird friendly structures. <p>Other Alternatives</p> <ul style="list-style-type: none"> - Noted. Eskom does not support the cabling of high voltage power lines for the following reasons: <ul style="list-style-type: none"> i. Cabling results in greater damage to the environment as the whole route has to be dug up with all the associated construction work and loss of vegetation ii. The time to trace a fault on an underground cable could be days or longer and impact on the supply to the surrounding area. iii. Repairing a high voltage cable is a specialist job, of which none are resident in George or Plettenberg Bay. The closest high voltage cable specialist in the CBD of Cape Town. iv. The cost of cabling is 8 to 10 times more than constructing an overhead powerline. Also towers and termination stations would be required where the cable goes underground thus further raising costs. The cost of cabling is simply not financially viable and the capital investment spent on the assets will not be recovered - Noted. Due to safety concerns, Eskom pylons cannot be erected on the bridge, nor can the cabling be strung onto the bridge. High voltage lines cannot be strung onto infrastructure such as bridges due to clearance issues (e.g. oversized loads moving over the bridge) and road accidents. High voltage cabling on a bridge can also become a major hazard during flood events. Further, the South African National Roads Agency employs a 20m buffer between any SANRAL infrastructure and Eskom powerlines. Therefore, for the safety of road users and the general public, it is not possible to erect pylons on the bridge or cable the powerline onto the bridge. - Noted. Please note that pylons will not be erected in the wetland area. One pylon position is located within the EFZ within a terrestrial habitat. Please refer to Response 10 under "Vegetation" for a description of the pylon position. The flow of the river will not be affected by the proposed development. Please refer to Responses under "Sense of Place" for responses regarding aesthetics, and bird
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	<p>Email Notification as well as 1X CD of FBAR, EMP and supporting documentation delivered for comment and review.</p>	<p>electrocution/collision.</p> <ul style="list-style-type: none">- Noted. A comprehensive Estuarine Ecology report (Appendix D), as has been referenced to throughout this response letter, was conducted since the Draft BAR publication to further assess the potential impacts on the Keurbooms Estuary and surrounding environment. As alluded to in this response letter, the Plettenberg Bay Municipality requested to increase its NMD (Notified Maximum Demand) upon which Eskom recommended an upgrade of electricity networks prior to granting the NMD request. The availability of water to the area, and issues of supply, remains a mandate to be solved by the Plettenberg Municipality, as previously stated. <p>24/07/13-16/08/13: Final BAR PPP</p>
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