
EXPANSION OF THE EXISTING KOMSBERG MAIN TRANSMISSION SUBSTATION (MTS), NEAR SUTHERLAND, NORTHERN CAPE

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COMMENTS RECEIVED:

No.	Issue	Issue Raised By	Response
I&AP REGISTRATION & PUBLIC PARTICIPATION PROCESS			
1.	Please register Karoo Hoogland Municipality: Mr GW Von Mollendorf karooadmin@telkomsa.net t.053 3913 003 f.086 516 2183	Christelle Viljoen Administrator: Corporate Services Karoo Hoogland Municipality Email: 9-10-2015	Mr Von Mollendorf's contact details were added to the I&AP database.
2.	On the 19 of October 2015 the Dept. of Environment and Nature Conservation received a BAR with the following Project Description: Environmental Impact Assessment process public participation process expansion of the existing Komsberg main transmission substation (MTS), near Sutherland, Northern Cape Province. Please do send the DEA Ref Number as we need to acknowledge the document.	Luzane Tools-Bernado EIA: Administration Northern Cape Department of Environment and Nature Conservation (DENC) Email: 22-10-2015	Comment noted, the EA application reference number will be sent to the DENC once it is received from the DEA.

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POTENTIAL IMPACTS ON THE SUTHERLAND CENTRAL ASTRONOMY ADVANTAGE AREA			
3.	<p>The South African Astronomy Observatory (SAAO) would like to register as an Interested and Affected Party given that the proposed Expansion of the Komsberg Substation falls within the Sutherland Central Astronomy Advantage Area (CAAA), which is declared under the Astronomy Geographic Advantage (AGA) Act of 2007.</p> <p>SAAO's main concerns are with regard to developments that can cause light and dust pollution in the vicinity of the Sutherland telescopes. Light and dust pollution affect the quality of the night sky, and therefore such developments will have a negative impact on optical astronomy at SAAO and Southern African Large Telescope (SALT).</p>	<p>Dr Ramotholo Sefako Head of Telescopes Operations South African Astronomical Observatory</p> <p>Reply Form: 12-10-2015</p>	<p>Mr Sefako's details were added to the I&AP database. SAAO's concerns are noted. This project is only for the expansion of the existing Komsberg Main Transmission Substation. The area in which work is to be carried out is approximately 19.8 ha, which is relatively small. The EMPr has taken dust and lighting concerns into account. Both the aforementioned potential impacts will be of short duration and limited to the construction phase. Objective 14 of the EMPr deals with visual impacts which includes mitigation measures for potential lighting impacts while Objective 7 deals with dust management.</p>
COMMENTS RECEIVED FROM THE DEA			
4.	<p>The Draft Basic Assessment Report (DBAR) dated October 2015, received by the Department on 16 October 2015 and the acknowledgment letter of the application form and the DBAR issued by the Department on 26 October 2015, refer.</p> <p>The Department has the following comments:</p>	<p>Constance Musemburi Case Officer and Mr Wayne Hector Deputy Director; Strategic</p>	<p>The comments received from DEA are noted.</p> <p><u>Public Participation</u></p> <p>The public participation process undertaken comply with the requirements of the public participation process in terms of the EIA Regulations 2014 and all comments received form part of the Final BAR (refer to Appendix E of the BAR).</p>

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	<p><u>Public Participation Process</u> Please note that you are reminded to comply with the requirements of the public participation process in terms of the EIA Regulations 2014. In this regard, among other things, comments from this Department's Biodiversity Section, other relevant organs of state and all I&APs must be submitted in the final BAR.</p> <p><u>Specialist Reports</u> The independence of Mr Gerhard Botha of Savannah Environmental (Pty) Ltd who compiled the Ecological Specialist Report dated October 2015 may be questioned as he is working for the same company (Savannah Environmental (Pty) Ltd who is commissioned as the environmental consultancy to conduct the basic assessment for the above mentioned application. An external review of this specialist report in this regard is strongly recommended by this Department. Please note that the external review must be brought to the attention of registered Interested and Affected Parties for their comments. This must be done prior to the submission of the FBAR to this Department.</p>	<p>Infrastructure Developments Department of Environmental Affairs Letter: 20-11-2015</p>	<p><u>Specialist Reports</u> The Ecological specialist report compiled by Mr Gerhard Botha was peer reviewed by Simon Todd of Simon Todd Consulting Ecological Specialist services (refer to Appendix D-1- for the peer review opinion. The Ecological report was subsequently revised and subjected to a further 30 day public participation period (refer to Appendix E2).</p> <p><u>General Comments</u> Comment noted.</p>

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	<p><u>General</u> You are required to comply with Regulation 19 (1) (a) of the Environmental Impact Assessment (2014), which state that: "Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) <i>A basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.</i>"</p> <p>Seeing that there are significant changes or new information that must be added to the DBAR (w.r.t. Ecological Specialist Report) or EMPr or information which was not contained in the reports consulted on during the initial public participation process, you are therefore required to comply with Regulation 19 (b) which state:</p>		

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	<p><i>"notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr, or where applicable, a closure plan, which changes or information was not contained in reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process for at least 30 days".</i></p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act</p>		

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	No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.		
HERITAGE IMPACTS			
5.	<p>Savannah Environmental (Pty) Ltd (Savannah) was contracted by Eskom Holdings SOC Limited (Eskom) to complete a Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) for the proposed expansion of the Komsberg Main Transmission Substation (MTS) and associated infrastructure near Sutherland, Northern Cape. Savannah contracted Celeste Booth and John Almond to conduct the Archaeological Impact Assessment (AIA) and the Palaeontological Impact Assessment (PIA) for the project respectively. Booth, 2015. A Phase 1 Archaeological Impact Assessment (AIA) for the proposed extension of the existing Komsberg Substation (Two Alternatives areas) and widening of the access road, near Sutherland, Northern Cape.</p> <p>The author assessed the two alternatives for the location of the proposed substation extension and one alternative (preferred route) for the access road. Alternative 2 for the substation</p>	<p>Natasha Higgitt Heritage Officer South African Heritage Resources Agency Letter: 8-01-2016</p>	<p>The comments received from SAHRA are noted.</p>

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	<p>extension was the preferred alternative as it had been previously disturbed due to construction activities associated with the existing substation. No archaeological heritage resources were identified within the proposed project area and the impact significance to heritage resources was low. However, it was noted that heritage resources and informal burials may be present 50-80cm below the surface.</p> <p>Recommendations in the AIA included the following:</p> <p>Should the current layout of the proposed development be altered in anyway, an archaeological walk-through of these changes must be conducted and further mitigation measures be made if relevant;</p> <p>Should heritage resources be uncovered during the construction phase of the project, all work in the area must cease immediately and be reported to SAHRA and/or the McGregor Museum, Kimberly. The find should be investigated by a professional archaeologist who</p>		

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	<p>will provide further recommendations. Should it be deemed necessary, a Phase 2 Mitigation permit must be applied for in order to conduct any sampling, excavations or collections of heritage deposit before the development can continue.</p> <p>A trained site monitor must be present during the construction phase of the development. This individual will report on any archaeological sites uncovered during the development. Construction managers/foreman and/or the Environmental Control Officer (ECO) should be trained to identify the typical heritage resources that would be expected within the project area and what procedures should be followed should these types of heritage be found.</p> <p><i>Almond, 2015. Palaeontological Heritage Assessment: Combined Desktop and Field-Based Study (Basic Assessment) for the Proposed Expansion of the existing Komsberg Main Transmission Substation on farm Standvastigheid 210 near Sutherland, Northern Cape.</i></p>		

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	<p>The author found that the fluvial Abrahamskraal Formation, known for its diverse fauna of Permian fossils vertebrates as well as fossil plants of the Glossopteris flora, underlies the Komsberg Substation study area. A well-exposed section of Abrahamskraal formation was examined to the north and west of the proposed project area, however no fossils resources were identified. One instance of vague trace fossils was identified approximately 1 km from the proposed project area. It was stated that the overall impact significance of the construction phase of the proposed project is assessed as low.</p> <p>Recommendations included:</p> <p>Should construction activities occur deeper than 1 m, the bedrock excavations must be monitored by the responsible ECO. Should any fossil remains be exposed during construction, the ECO must stabilise the find and report the incident to SAHRA APM Unit. The find must be investigated by a professional palaeontologist who will provide further recommendations. Should it be deemed necessary, a Phase 2</p>		

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	<p>Mitigation permit must be applied for in order to conduct any sampling, excavations or collections of heritage deposit before the development can continue.</p> <p>Regarding archaeological and palaeontological heritage resources, the SAHRA Archaeology, Palaeontology and Meteorites Unit accepts the submitted AIA and PHA and their respective recommendations, and has no objections against the development. The following additional conditions must be adhered to and must form part of the final EMPr:</p> <ul style="list-style-type: none"> » A Chance Finds Procedure and Fossil Finds Procedure must be developed for the project to ensure that standard protocols and steps are followed should any heritage and/or fossil resources be uncovered during the construction phase of the project. These procedures should outline the steps and reporting structure to be followed in the instance that heritage resources are found. » The EMPr discussed three alternatives for the access road, however the AIA and PHA 		

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	<p>only assessed the preferred alternative. As such, should the preferred option assessed as part of the AIA and PHA be changed to one of the other two alternatives, the alternative must be subjected to a final walk-down prior to construction taking place to ensure that no heritage resources will be impacted on. A walk-down report detailing the findings of the assessment must be submitted to SAHRA for comment before construction takes place. The above condition must apply for any changes in the layout of the proposed development.</p>		