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ESKOM: WESTERN CAPE OPERATING UNIT
Brackenfell
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Reference #: 20005
Date: 5 August 2017

ATTENTION: MRS JUSTINE WYNGAARDT

Delivered by e-mail: wyngaajo@eskom.co.za

Dear Mrs Wyngaardt

EAP comment for the realignment of a portion of the proposed Outiniqua-Oudtshoorn power line.

1. INTRODUCTION

W Nel Environmental Consulting Services (WNECS) has been appointed by Eskom Holding SOC Ltd to provide a comment to confirm the assessment methods used by the Environmental Assessment Practitioner (EAP) for conducting the Basic Assessment and subsequent amendments to the Environmental Authorisation for the realignment of a section of the proposed Outeniqua Oudtshoorn power line.

The Basic Assessment (DEA REF: 14/12/16/3/3/1/613, granted 31 October 2013) and Amendment (DEA REF: 14/12/16/3/3/1/613, granted 04 August 2015) had been completed by SiVEST Western Cape. This office had been closed since the end of May 2016 after which Werner Nel, an ex-employee of SiVEST, have started WNECS as a private environmental consultancy. Werner had been involved in the project as the EAP and author of the Amendment Application and therefore has suitable experience in this project to provide insight in the methods used during both the Basic Assessment process as well as the Amendment Application.

2. ASSESSMENT METHODOLGY

The following impact assessment methodology had been used during both the Basic Assessment process as well as for the Amendment application.

2.1 SIVEST ENVIRONMENTAL RATING SYSTEM USED TO CLASSIFY IMPACTS DURING THE ASSESSMENT PROCES

The EIA methodology assists in evaluating the overall effect of a proposed activity on the environment. The determination of the effect on an environmental impact on an environmental parameter is assessed through a systematic analysis of the various components associated with the potential impact. This is undertaken using information that is available to the EAP through the process of the environmental impact assessment. The impact evaluation of predicted impacts had been undertaken through an assessment of the significance of the impacts based on the information and guidance provided in the specialist reports and their findings. Each impact identified has been consolidated into a single rating. In assessing the significance of each issue, the following criteria had been used.

NATURE	
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.	
EXTENT (GEOGRAPHICAL)	
Site	The impact will only affect the site
Local/ district	Will affect the local area or district
Province/region	Will affect the entire province or region
International and National	Will affect the entire country
DURATION	
Construction period / Short term	Up to 3 years
Medium term	Up to 6 years after construction
Long term	More than 6 years after construction
PROBABILITY	
Definite	Impact will certainly occur (>75% probability of occurring)
Probable	Impact likely to occur (50 – 75% probability of occurring)
Possible	Impact may occur (25 – 50% probability of occurring)
Unlikely	Impact unlikely to occur (0 – 25% probability of occurring)
REVERSIBILITY	
Reversible	Impacts can be reserved though the implementation of mitigation measures
Irreversible	Impacts are permanent and can't be reversed by the implementation of mitigation measures
IRREPLACEABLE LOSS OF RESOURCES	
High	The impact is result in a complete loss of all resources
Medium	The impact will result in significant loss of resources
Low	The impact will result in marginal loss of resources
No Loss	The impact will not result in the loss of any resources
CUMULATIVE EFFECTS	
High	The impact would result in significant cumulative effects
Medium	The impact would result in moderate cumulative effects
Low	The impact would result in minor cumulative effects
SIGNIFICANCE RATINGS	
Significance is determined through a synthesis of impact characteristics. Significance is an indication of importance of the impact in terms of both physical (geographical) extent and time scale (duration), and therefore indicated the level of mitigation required. This describes the significance of the impact on the environmental parameter.	
High	- Province/region and medium / long term - International and National and medium / long term - Local/ District and long term - Site specific and long term
Medium	- Site specific and medium term - Local/ District and medium term - Province/region and short term/construction phase - International and National and short term/construction phase
Low	- Site specific and short term/construction phase - Local/ District and short term/construction phase

This methodology had been used to assess the potential environmental impacts associated with the proposed development. At the time of doing the assessment for the proposed Outeniqua-Oudtshoorn Power Line the area as a whole had been investigated with special attention provided to the specific co-ordinates provided by the client for the placement of the poles. A corridor of approximately 100m wide is used in general to allow for final placement of poles to be offset should areas of concern be identified.

2.2 SPECIALIST INPUTS

For the environmental impact assessment of the proposed development various different specialists had been contracted to provide inputs regarding potential impact associated with this project. These included inputs from a Botanical specialist, Avifauna Specialist, Fresh Water Specialist and Heritage Specialist. Based on personal conversations with all of the above-mentioned specialists on 4 August 2017 it had been confirmed that all of them have assessed the wider area as indicated above, with particular focus at the specific co-ordinates provided.

Following the Amendment, a final specialist walk-through had been scheduled for March 2017 prior to the commencement of construction. At this time, the new realignment had been proposed and Eskom is currently in the process of completing an Amendment application (Ref # 14/12/16/3/3/1/613/AM2) requesting the proposed changes. All the specialists involved had provided feedback.

Botanical: *Bergwind Botanical Surveys and Tours* suggested that there would be no significant difference in terms of the negative impacts on the vegetation and flora between the originally proposed route and that of the deviation.

Avifauna: *Wild Skies Ecological Surveys* concluded that should the mitigation measures and recommendations proposed for the project be accepted and implemented in a timely fashion, these should provide an acceptable level of mitigation for bird impacts associated with the proposed power line.

3. CONCLUSION

Following a review of the methodology used in the assessment of the area for the proposed Outeniqua-Oudtshoorn Power Line development it is suggested that not only the specific locations where the poles are to be placed had been assessed. The environment as a whole had been assessed by the EAP and all the specialists involved and it had been successfully presented in order that the project received and Environmental Authorisation in 2013 and an Amendment changing the route delineation in 2015.

Based on the specialist feedback it had been confirmed that the proposed realignment would not pose any significant differences in terms of negative impacts tot the environment and thus it does not require further assessment.

It is therefore confirmed that a corridor of approximately 100m had assessed as part of the wider environment during the Basic Assessment and Amendment process. The originally assessed corridor would therefore have included the servitude and area of the proposed realignment.

Yours sincerely

5 August 2017

Werner Nel

Date