



Land Management
(Region 3)

REFERENCE: 16/3/1/6/4/1/D1/14/0065/12

ENQUIRIES: Mrs R Roets

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Director General
Department of Environmental Affairs
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0001

For attention: Ms. Nyiki Ngoveni

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Dear Madam

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE 66KV ESKOM POWERLINE AND NEW SUBSTATION ON FARM 305 PORTION 16 EAST OF BITOU RIVER (DEA REF 14/12/16/3/3/1/570 AND NEAS REF: DEA/EIA 0001209/2012)

1. The abovementioned document dated and received on 22 June 2012 and e-mail correspondence dated 15 November 2012 by the Directorate: Land Management (Region 3) of this Department refers.
2. After careful consideration of the information contained in the Basic Assessment Report ("BAR") this Department has the following comments:
 - 2.1. The Department is concerned about the construction of the proposed substation within the estuary functional zone. This area is also located within a Critical Biodiversity Area and or Ecological Support Area in terms of the fine scale biodiversity conservation maps of the region. It also traverse three areas

designated as National Freshwater Ecosystem Priority Areas (NFEPA's) that are indicated to have a high Present Ecological Status (PES = B). 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.

- 2.2. 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.
 - 2.3. 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 Environmental Management Programme (EMP). Detailed method statements and design drawings should be requested to be included in the EMP for approval by Department of Environmental Affairs (DEA).
3. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
 4. This Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours faithfully



HEAD OF DEPARTMENT

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