

SCIENTIFIC SERVICES

postal Private Bag X5014 Stellenbosch 7599
physical Assegaaibosch Nature Reserve Jonkershoek
website www.capenature.co.za
enquiries **Alana Duffell-Canham**
telephone +27 21 866 8000 **fax** +27 21 866 1523
email aduffell-canham@capenature.co.za
reference **SSD14/2/6/1/8/3/Eskom_765kV_Helios-Juno**
date **25 November 2015**

Judith Alford
Mokgope Consulting
49 3rd Avenue
Highlands North
2192

By email: judy@mokgope.co.za

Dear Ms Alford

RE: Proposed Helios-Juno 765kV Transmission Power Line and Substations upgrade, Northern Cape & Western Cape Provinces – Amended Draft Environmental Impact Report.
DEA Ref: 14/12/16/3/3/2/439

CapeNature would like to thank you for the opportunity to comment on the amended Draft Environmental Impact Report for the proposed 765kV power line between Helios and Juno substations. Our previous comments on the Draft Environmental Impact Report (dated 14 August 2014) have reference.

1. As stated previously, all three powerline corridor alternatives lie within an area known as the Knersvlakte. Conservation of the Knersvlakte is of international importance and the area is also one of the two richest areas for succulent plants in the world. Impacts associated with the construction of a powerline, particularly vehicular and machinery access, could be of extremely high negative and of very long term, possibly permanent duration. It is thus extremely important that the feasibility of all proposed mitigation measures are fully assessed during the EIA process. Mitigation measures should not have to rely on additional information obtained after authorisation to determine whether sensitive areas can be avoided or not. It is for this reason that we requested that the specialists undertake detailed ground-truthing of the proposed powerline routes during the EIA phase.
2. From the additional information provided in the amended Draft Environmental Impact Report (DEIR) we are willing that Corridor 1 with the proposed deviations be accepted as the preferred route to undergo detailed ground-truthing. This includes the deviation proposed by the avifaunal specialist, even though it will pass through one of the Knersvlakte Nature Reserve properties, provided that this deviation follows the Varschrievier road reserve. The road is adequately buffered and some distance from any important quartz and dolomite areas.

3. We would still however like to arrange a meeting between yourselves and the avifauna specialists to discuss the collision risks of the deviation as compared to having the new line and the existing line running parallel as questions have been raised regarding increasing the use of markers or birds learning avoidance of this area. There is some evidence with the telemetry data from Dr Jessica Shaw's thesis that birds with long periods of residency and repeat visits to known sites should often be familiar with the landscape (and positions of obstacles like power lines). However, if high number of collisions are continually being recorded along this section, then the better option will be to use the deviation suggested by the avifaunal specialist.
4. Corridor 1 and the deviations still require fine-scale identification and mapping of sensitive patches. Although the botanical specialist has created a vegetation sensitivities map, this has been done at quite a large scale. It must be proven that all sensitive areas can be avoided entirely or spanned (they also should not be driven over during construction or maintenance). The same must apply to all wetland areas.
5. We would like to reiterate that ground-truthing must occur during late Winter (i.e. August-September).
6. The project should be planned so that construction takes place in the dry summer months as the soils become slippery in Winter, resulting in more damage from driving.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alana Duffell-Canham
For: Manager (Scientific Services)