

Reference: **Enquiries:**

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Dear Sir/Madam

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF 9KM 88KV ESKOM ETNA- TRADE ROUTE POWER LINE NEAR LENASIA. CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY

The above-mentioned matter received by the Department on 26 April 2018 has reference.

The proposal entails replacing of an existing Eskom 88KV power line located within a 31m wide servitude and a length of approximately 9km starting from an existing Etna substation via Lehae substation to the Trade Route switching station which is currently under construction. The route runs parallel to the R553 Road starting from Etna substation until Olifansvlei dam, whereby it bends along the dam via Rietfontein town to the Trade Route switching station. The proposed 88KV power line aims to strengthen the distribution network capacity as well as to improve the quality of electricity supply in the region and the national electricity grid at large. The project also entail decommissioning of the existing 88kv to make way for the proposed new power line which is planned to be built within the same servitude. The applicant applied for the following activities 11, 19, 31 and 12 of Listing Notice 1 of the Environment Impact Assessment Regulations, 2014.

The Department will like to comment as follows:

A. Alignment of the activity with applicable legislations and policies

The report has made provision to accommodate all applicable legislation, policies and guidelines. The activity entails the replacement of an existing Eskom power line which has an impact in terms of the National Water Act, 1998 (Act No. 36 of 1998), the National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended). The Gauteng Environmental Management Framework, 2015 (GEMF. 2015) identifies the proposed site as Environmental Management Zone 1 and 2.

The Departmental Conservation Plan Version 3.3 depicts sensitive environmental features such as Critical Biodiversity Area (CBA) or Important Area, Ecological Support Area (ESA), a River, Wetland, Primary Vegetation, Dolomite and a Class 1Ridge. The specialist Assessment submitted with the report has been noted and covers ecological aspects of the site/alignment.



B. Alternatives

Two technical alternatives have been identified for the proposed project on the DBAR, which are the overhead power line and underground cabling. The tower to be used will depend on the technical requirement such as bend points and ecological constrains associated with the alignment. The identified alternative must be assessed and be included in the FBAR in order to ensure feasible alternative are included to inform decision making.

C. Significant rating of impacts

The identification and assessment of impacts is provided in the Draft BAR. This must lead to a conclusion that the mitigation measures identified will reduce impacts to an acceptable level. This must also form part of the Final BAR to inform decision.

D. Locality map and layout plans or facility illustrations

The locality (alignment and station) map must be included in the Final BAR. This must be accompanied by a composite sensitivity map with a legend that easily links activity components (line alignment and station).

E. EMPr

The attached EMPr must be included in the Final BAR, highlighting all identified impacts and their associated mitigations.

F. Public participation process

Public Participation has been undertaken in accordance with the EIA Regulations, 2014. Comments from all relevant stakeholders must be adequately addressed and submitted to the competent authority with the Final BAR. Legible site notices together with the newspaper advert must be included in the Final BAR.

Proof of correspondence (site notice, newspaper advertisement, email, fax, delivery etc.) with stakeholders must be included in the Final BAR. Should you be unable to submit comments, proof of attempts that were made to obtain comments must be submitted to the Department.

G. The Department has reviewed the report and made the following findings:

- It must be noted that three channelled valley bottom wetland and one none perennial stream will be crossed over by replacement of the Eskom power line. Due to the watercourse being on the Eskom servitude, no development other than the replacement of an existing Eskom cable must be permitted within the watercourse or 32 meters buffer of the watercourse, measured from the outer edge of the watercourse.
- Activities 9 and 12 of listing notice 1 have been applied for, the engineering method to cross over the watercourse must be outlined in the final report together with the envisaged impacts and proposed mitigation.
- The construction camp-site and/or storage area for construction material and machinery must be kept away from the watercourse its associated buffer.
- According to the Departmental C-plan Version 3.3, the proposed site is transverse by Class 1
 Ridge, however the study concluded that the ridge classification to be a class 2. Further, it is
 envisaged the replacement of Eskom cables will be minimal as a development foot-print.
- Recommendations made in the DBAR report for the Specialists studies must strictly be adhered to.



 The biodiversity assessment strongly recommended that a walk-down assessment be conducted between March and June to confirm the presence/ absence of the potential presence of (Cineraria austrotransvaalensis). This must be undertaken in line with the minimum GDARD Biodiversity Assessment and the Final BAR be updated to include the findings as well as recommendations from the specialist.

If you have any queries regarding the contents of this letter, contact the official at the details indicated above.

Kind Regards

Mr. Steven Mukhola

Director: Impact Management

Date: 1.4/.5/22/8