



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

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DAFF

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Forestry Regulations & Support

30 March 2017

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Attention: Mr. Paul Scherzer

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT (DEIA): COMMENTS FOR THE PROPOSED ISUNDU 765/400 KV SUB-STATION AND TURN-IN TRANSMISSION LINES. DEIA EIA REFERENCE NUMBER: 14/12/16/3/3/2/745

The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to review and comment on the DEIA for the above mentioned development. DAFF through the sub-directorate Forestry Regulations and Support is the authority mandated to implement the National Forests Act, (Act No. 84 of 1998) by regulating the use of natural forests and protected tree species in terms of the said Act

With reference to the document received, the sub-station site is occupied by a farm under natural vegetation (mostly grassland) which is mowed regularly, baled for hay production and sold as the main economic activity on the farm. This takes place across the whole site, excluding areas under thicket/bush. There are several plant communities identified within the study area which include the occurrences of *Acacia nilotica* (dominating woody species) tall

closed grassland/short thicket mosaic and *Acacia robusta*(dominating species) short thicket. With regards to the towers site the final placement of towers along the preferred alignment will be determined at a later stage, during a specialist walk down.

There are a number of impacts which can be minimised through strict enforcement of an EMPr during construction, rehabilitation and the operation phase. The department supports the recommendations outlined in the EMPr and recommend that the following conditions are adhered to:

- a) Sensitive areas of vegetation should be avoided, firstly, by routing the transmission line around sensitive vegetation, or, secondly, routing over sensitive vegetation. This will require placement of towers within transformed/degraded areas.
- b) It must be taken into account that where sensitive vegetation is found within the servitude, stringing of the conductors should be done via helicopter, or shot over the sensitive vegetation (irrespective of topography), where significance of impacts associated with vehicular movement between towers will be high. In these situations, operational maintenance will also need to be done via helicopter to avoid impacts associated with vehicular movement in the servitude between towers.
- c) Clearance of indigenous forest/thicket across ravines and gullies should not be permitted, as these areas will very rarely interfere with minimum conductor clearance requirements. These areas should be spanned.
- d) Where new tracks are required to access tower sites, input from a vegetation specialist is to be obtained, and sensitive areas of vegetation and wetlands are to be avoided
- e) The undertaking of a targeted survey prior to construction to rescue any protected or rare/threatened vegetation species. This needs to be done at the right time of the year for flowering and any protected plants or trees to be impacted will also need to be identified.
- f) Prior to construction of towers, input from the vegetation/wetland specialist and the fauna specialist is required on the final location of towers, and the sensitive areas of vegetation and habitat to avoid.
- g) Should there be a need to disturb indigenous trees in a natural forest and/or protected trees in terms of the NFA a permits or licences must be obtained prior to construction from DAFF offices in Pietermaritzburg. Eskom's environmental manager must ensure that these processes are commenced timeously.

This letter does not exempt you from considering other environmental legislation
Should any further information be required, please do not hesitate to contact this office.

Yours faithfully

N. Sontangane



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Forestry Regulations & Support - KZN