

7 September 2017

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cc:
Mr. Brian Boswell
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Dear Mr. Smith,

PROPOSED ISUNDU 765/400 KV SUB-STATION AND TURN-IN TRANSMISSION LINES
DEA EIA REF: 14/12/16/3/3/2/745
Your Reference: Mr. W Smith/tm/16FL1062

Your letter of 13 December 2016 has reference.

Your client has indeed provided comments as an interested and affected party and the EIA team has had various discussions and interactions with the Boswell's over the course of the assessment. This has included visits to their premises to better understand the components of their operation.

All major infrastructure projects have some positive and negative impacts which need to be assessed for significance and appropriate mitigation measures need to be devised where necessary. However, no direct impacts on the Natal Zoological Gardens, Natal Lion Park or the exotic birds were identified. The indirect impacts were considered and found to be of low significance for the activities being undertaken by Mr. Boswell. The possible future impact from the planned Isundu-Mbewu 2x400 kV transmission lines was considered under the cumulative impact section of the Isundu Environmental Impact Assessment Report (EIAR). However, these were also found not to be significant for the type of activities being undertaken by Mr. Boswell. Importantly, the planned Isundu-Mbewu 2x400 kV transmission lines will form part of a separate Environmental Impact Assessment (EIA) application. During this EIA, transmission line corridor alternatives will be identified (not necessarily the exact same as shown in the Isundu EIAR) and these will need to be assessed along with stakeholder input.

The visual impact of the sub-station and transmission lines have been considered and mitigation in the form of screening trees along the road has been recommended. The Natal Zoological Gardens and Natal Lion Park are the existing local enterprises which are furthest away from the proposed sub-station. The Natal Lion Park views are in the opposite direction, whilst from some parts of the Natal Zoological Gardens it may be possible to see the proposed 765 kV transmission line approximately 1.3 km away. However, an important aspect to take into consideration is that zoos typically occur around the world in far more built up areas than the Natal Zoological Gardens. The fact that transmission line infrastructure may be visible on the way to the Zoological Gardens, along with chicken farms, existing transmission lines, quarries and industry in the distance, and creeping unplanned urban development, was found not to be a significant factor likely to deter visitors. In addition, although from a few places within the Zoological

Gardens, the 765 kV transmission line approximately 1.3 km away may be visible, it is also not likely to affect the visitor experience offered, primarily as visitors have come to see unusual animals, not in their natural settings, but in cages.

The potential impacts arising from dust, noise and lighting are very species specific and directional. The prevailing wind direction is from the sub-station site towards the RCL Food's poultry farms (which is in the other direction to the Natal Zoological Gardens/Natal Lion Park), with one RCL farm being approximately 450 m away. Poultry are potentially susceptible to dust changes and this was found to be a potential risk to RCL's production (should they still be operating on this site at the time). Lighting is also a very specific poultry production issue used to regulate their laying. The assessment did not identify any similar potential impacts from dust or light on either ABOPS or Natal Zoological Gardens/Natal Lion Park operations.

ACER takes note of the concern raised about blasting noise affecting or frightening the animals at the Natal Zoological Gardens/Natal Lion Park. ACER has included in the Final EIAR the need to also monitor and mitigate blasting noise at these facilities to reduce any stress that may lead to animals injuring themselves.

The reason for recommending the relocation of ABOPS was twofold. Firstly, during operation, the infrastructure is likely to increase the risk of losing birds in the free flying demonstrations either from collisions or tracking interference should they fly away. Secondly, the Bearded Vulture breeding programme is a National Biodiversity initiative to conserve a vulnerable indigenous species. The assessment found that due to the location of ABOPS near the road, the passing construction traffic may introduce a noise disturbance risk at a critical time for the success of this programme.

No such impacts were identified for the Natal Zoological Gardens/Natal Lion Park which will not be passed by construction traffic and do not undertake free flying demonstrations with protected raptors. The breeding of exotic (although endangered) parrots and macaws for presumably the pet industry, is not comparable to a National Biodiversity initiative to protect an indigenous species. Thus, the relocation of the Natal Zoological Gardens/Natal Lion Park was not found to be necessary or warranted.

I trust this response and the changes made in the Final EIAR mitigation measures relating to blasting noise and monitoring suitably addresses your client's issues and concerns.

Yours sincerely,



ACER (Africa) Environmental Consultants

Mr. PJ Scherzer

Environmental Assessment Practitioner