

Vivienne Thomson

From: Floresca Julius <Floresca.Julius@westerncape.gov.za>
Sent: 03 March 2020 08:40
To: cwessels@atlastowers.com; vivienne@enviroafrica.co.za; Clinton Petersen
Cc: Steve Kleinhans; Francois Naude; Meryll Fredericks
Subject: DEA&DP Ref: 16/3/3/1/D2/19/0015/19 - Comment on the Second Revised Draft Basic Assessment Report for the Proposed Development of a 25-metre High Telecommunications Mast on Portion 112 of the Farm Hans Moes Kraal No. 202, George
Attachments: SKM_C55820030308490.pdf

Good Day,

Please find attached the comment from Mr. Steve Kleinhans regarding the aforementioned subject.

For enquiries please contact Mr. Steve Kleinhans on 044 – 805 8632 or using:
Steve.Kleinhans@westerncape.gov.za

Kind Regards

Floresca Julius

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REFERENCE: 16/3/3/1/D2/19/0015/19
ENQUIRIES: Steve Kleinhans
DATE OF ISSUE: 2020 -03- 02

The Managing Director
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E-mail: cwessels@atlastowers.com

Dear Sir

COMMENT ON THE SECOND REVISED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A 25-METRE HIGH TELECOMMUNICATIONS MAST ON PORTION 112 OF THE FARM HANS MOES KRAAL NO. 202, GEORGE

1. The abovementioned document dated January 2020, refers.
2. This Directorate has reviewed the information contained within the second Revised Draft Basic Assessment Report ("RBAR") and provides the following comment:

2.1. Comment on Visual Impact Assessment

The opinion statement by the Visual Specialist has been noted. The Visual Specialist has stated that in a scenario where the stand of alien invasive trees is retained, the visual impact associated with the development of all three mast options (i.e. lattice, monopole or a mast disguised as a tree) will be within acceptable levels of change within the landscape. According to the opinion by the specialist, the telecommunication mast disguised as a tree will have the least impact if the stand of trees is retained and is therefore the preferred mast option in such a scenario. However, in a scenario where the stand of trees will be removed or the composition of the stand of trees changes, the Visual Specialist has the opinion that both a lattice and monopole mast type provide more acceptable visual impact options. In comparing a lattice mast with a monopole mast type, the specialist states that the lattice mast does not provide a solid

the future of the trees and its configuration is uncertain in the long term, a mast option which would fit best in both scenarios may be considered as the preferred option. It is understood that in this case the lattice mast type should be considered the preferred option in the long term.

2.2. *Management of Alien Invasive Species*

In this Directorate's letter dated 11 December 2019, it was highlighted that other relevant legislation which governs the eradication of listed alien invasive species must also be complied with. As indicated, a permit or exemption, similar to that obtained in terms of the Conservation of Agricultural Resources Act, Act No. 43 of 1983 ("CARA"), should also have been obtained in terms of the *Alien and Invasive Species Regulations* (GN No. R. 598 of 1 August 2014) promulgated under the National Environmental Management: Biodiversity Act, (Act No. 10 of 2004 as amended). However, this has not been addressed in the second RBAR. The Environmental Assessment Practitioner must address this as it has a direct impact on one of the mitigation measures proposed in the BAR.

2.3. *Consideration of Alternatives*

From the second RBAR it is noted that Alternative 2a: Tree mast with the existing pine trees is the preferred alternative. However, based on the outcome of the visual impact assessment, the lattice mast type (Alternative 4) is considered to be the "most preferred alternative".

Furthermore, it is noted that no site alternatives have been considered due to the proximity to existing masts, coverage needed and the coverage it can provide; however, a "site condition" alternative has been considered i.e. removal of the stand of alien invasive species vs. keeping the stand of alien invasive species. According to the second RBAR the preferred site condition is that the stand of tree remain on condition that the spread of the alien invasive trees is managed and prevented by the landowner / user.

This Directorate will consider the various alternatives on each of their respective merits and the information provided in the BAR.

3. Submission of the Final Basic Assessment Report ("BAR")

With reference to this Department's letter dated 13 December 2020, please note that the Final BAR must be submitted by no later than **9 March 2020**.

Please be reminded that if the BAR is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 (as amended) and your file will be closed. Should the current application lapse and you would wish to pursue the application again, a new application process would have to be initiated. Therefore, a new Application Form would have to be submitted and the prescribed application fee would have to be paid again.

Please note that **one** printed copy as well as two electronic copies (saved on CD/DVD) of the FBAR must be submitted to this Directorate.

4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
5. Please note that the proposed activities may not commence prior to an Environmental Authorisation being granted by this Directorate.
6. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.

Yours faithfully



HEAD OF COMPONENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Ref.: 16/3/3/1/D2/19/0015/19

Copied to:

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