

Lynette Herbst

Subject: FW: LUA 22.3166 Gods Window, Skywalk
Attachments: LUA 22.3166
Dft.BAR_NewSkywalkTourismDesign_GodsWindow_Houtbosch.503.KT_Lisbon.531.K
T_ThabaCheu_Zutari.pdf

From: Johan Eksteen <johan.eksteen@mtpa.co.za>
Sent: Sunday, 25 September 2022 11:52
To: Natanya Whitehorn <natanya.whitehorn@zutari.com>
Cc: Phumla Nkosi <phumla.nkosi@mtpa.co.za>; Frans Krige <frans.krige@mtpa.co.za>; Khumbelo Malele <khumbelo.malele@mtpa.co.za>
Subject: FW: LUA 22.3166 Gods Window, Skywalk



Good day
Attached, please find the MTPA comments on the application - Skywalk at Gods Window.
Regards
Johan

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From: Lorraine Oosthuizen <lorraine.oosthuizen@mtpa.co.za>
Sent: Friday, 23 September 2022 09:25
To: Johan Eksteen <johan.eksteen@mtpa.co.za>
Subject: LUA



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Dear Ms. Whitehorn,

SUBJECT: THE MTPA COMMENTS REGARDING THE DRAFT BASIC ASSESSMENT REPORT FOR THE ENVIRONMENTAL AUTHORISATION PROCESS FOR THE PROPOSED NEW DESIGN SKYWALK TOURISM FACILITY AT GOD'S WINDOW ON THE FARMS DE HOUTBOSCH 503 KT AND PORTION 2 OF THE FARM LISBON 531 KT IN THE THABA CHWEU LM, MPUMALANGA PROVINCE. Ref: DFFE 14/12/16/3/3/88/AM3.

Your correspondence received in August 2022, have reference.

The MTPA as a partner with Mapulana Canyon (PTY) LTD has no objection to the proposed DBAR or EMP for the above mentioned proposal but has the following concerns with regards to certain knowledge gaps found in the planning and execution phase.

1. The development proposal should be registered with Robyn Luyt's office (DARDLEA) in Mbombela.
2. The MTPA has the following comments with regards to the complete Environmental Management plan that still needs to be tabled. Please note that the regional Ecologist Mr. Bronkhorst has made some valuable comments and suggestions in Appendix 1.

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- More studies need to be done with regards to the phase one development of the Skybridge. The feasibility of this will depend on the stability of the rock cliff face wrt anchoring points and the effect of the construction of this on the surrounding sensitive vegetation. It is accepted that certain trees and shrub species over hanging branches will be clipped by a professional botanist.
- Vegetation on main tourism facilities roof. Management of ecological succession, species recruitment, new breeding habitat for rodents and birds, might need to be managed. Maintenance of plants on roof during operational phase.
Furthermore the orchid species that were not in flower during the field assessment need to be confirmed during their flowering season.
 - Species removed and relocated as part of the rehabilitation could decline due to transplantation shock or damage during replanting.
 - The removing and relocation of species must be done by a qualified botanist/ecologist.
 - The ECO should maintain a plant register. Names and numbers (where possible) of species that will be relocated should be kept on record so that like for like replacing is done during the rehabilitation phase.
- Regarding the safeguarding of the flying birds against the skywalk structure. The glass to be used for the skywalk must be treated to ensure that it will be visible to birds in the area in order to avoid avifauna mortalities. Mitigation in the form of bird deterrents.
- Fire management of ecological corridor within the 9 to 15-meter setback area. This is an important to note that a three year frequency of burning of this strip in front of the main building would be necessary to maintain species diversity and rejuvenation. This can easily be accomplished without posing a threat to facilities. Two 1 meter tracerlines by using of chemicals such as Roundup sprayed and burned on both sides of the ecological corridor will be sufficient to contain the strip burn. Firefighting equipment such as a pressure pump is essential. MTPA trained fire fighters can easily do this.
 - **In addition to the proposed fire sprinklers to prevent burning on the roof at least two fire taps need to be installed on site for refill of fire management trucks in the event of a huge fire threat.**
 - **An important management objective should be to remove the block of exotic plantation across the street. The section within the borders of the Protected Area, refer to MBSP terrestrial map figure 1 attached. This area can then be used for construction purposes or extra parking in the future. Needs to be negotiated with the forest company as well.**
 - **By removing the plantation in the PA will reduce the forest fire threat significantly by creating a buffer or fire break.**
 - **In the event of a fire threat to the facilities the use of a fire retardant called, Firefix, in the the water tanks for fire management will make the effort more affective and will save a lot of water. The use of Firefix within the sprinkler system is not recommended.**
- The new Electricity power lines that supply electricity from Graskop to the substation should be marked with bird flappers at appropriate places to prevent collusions. Nico van Rooyen from the EWT /Eskom partnership can advise.

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- Responsibilities to fulfill certain Services during the operational phase must be arranged
 - Regular maintenance of facilities;
 - Maintenance and care of surrounding vegetation and on the rooftop and ecological corridor- fuel loads reduced, fire management.
 - Waste water management.
 - Waste removal to registered waste landfill facility.
 - Ongoing Alien plant control.
 - Sustainable electricity supply. Alternatives such as renewable resources such as Wind or PV solar installations should be investigated.

3. The focus area of the proposed tourism facility within the protected area is indicated by a circle in figure 1. The plantation on the top left within the PA borders are not needed. The indigenous forest on the top right does not pose the same threat as an exotic tree plantation

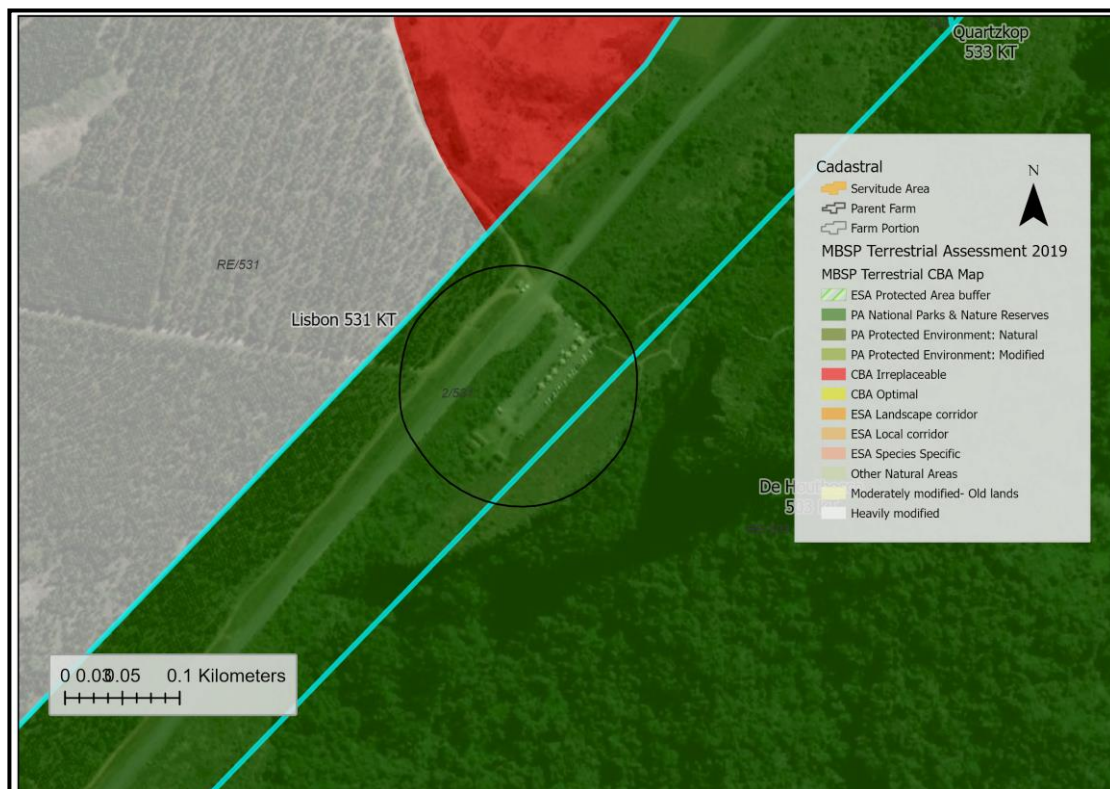


Figure 1: MBSP Terrestrial biodiversity assessment of the Skywalk development site.

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- Regarding the MBSP freshwater assessment map, figure 2, the whole area lies within a Strategic Water Source Area. The responsible use of water from a water quality and water quantity point of view is a high priority.



Figure 2: MBSP Freshwater assessment map of the Skywalk development site.

The MTPA thank Zutari for the comprehensive assessment reports.

Please do not hesitate to contact this office if there are any enquiries.



MR MH VILAKAZI
ACTING CHIEF EXECUTIVE OFFICER
DATE: 22 / 09 / 2022