



eTHEMBENI CULTURAL HERITAGE

South African Heritage Resources Agency
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15 January 2018

Attention: Ragna Redelstorff

**SAHRIS Case ID 12030
Eskom Clocolan – Ficksburg 88kV Power Line,
Setsoto Local Municipality,
Free State Province, South Africa**

Dear Ragna

Your Interim Comment to ACER (Africa) Environmental Management Consultants dated 15 December 2017 has reference:

As stated in *Van Schalkwyk, L. 2016. Heritage Scoping Assessment Amendment Eskom Clocolan – Ficksburg 88kV Power Line, Setsoto Local Municipality, Free State Province, South Africa*: the observations made where in response to recommendations made in the desktop Scoping Report compiled by eThembeni Cultural Heritage Management (CHM) in 2013, subsequently followed up by a field inspection of the final route alignment undertaken in April 2016. Please see 2013 report attached and loaded to SAHRIS.

The field inspection of the route alignment in 2016 revealed no physical impact on discrete heritage resources and endorsed the placement of the powerline within the existing servitude, substantially reducing any further potential incremental impacts to both the visual and physical landscapes.

We further reported on the potential impacts of the substations' establishment on the upper Triassic to lower Jurassic Elliot Formation's high palaeontological sensitivity (Groenewald 2012a,b)¹ and

¹ Groenewald, G. 2012a. Palaeontological Impact Screening Report Proposed Clocolan Solid Waste Disposal Facility on the Farm: Ferndale 349 of the Setsoto Municipality within the Thabo Mofutsanyane District Municipality in the Free State Province of South Africa. Report compiled for LHL Consulting Engineers.

Groenewald, G. 2012b. Palaeontological Impact Screening Report Proposed Ficksburg Solid Waste Facility Ficksburg, Free State Province of South Africa Farm: Kersie Proefplaas 952 in the Setsoto Local Municipality within the Thabo Mofutsanyane District Municipality. Report compiled for LHL Consulting Engineers.

recommended that a palaeontologist with experience of the Permian Extinction Zone should be appointed to have a watching brief to monitor excavations during establishment of the Substation platform.

In response to your Interim Comment we submit that we have complied with the requirements of a Phase 1 HIA when both the 2013 Scoping Report and the 2016 Amendment report are read in conjunction. The initial recommendation for a Phase 1 HIA and the subsequent field inspection and reporting are a consequence of Eskom originally requiring an entirely "greenfield" alignment, and subsequently deciding to place the new line within an existing alignment for which they had servitude rights; precluding the need to acquire new servitude, access and land acquisition rights.

I have personally discussed the palaeontological sensitivities of the Maraleng S/S site with Dr Gideon Groenewald (SAHRA accredited Palaeontology PI) who is intimately familiar with the area.² eThembeni CHM have appointed Dr. Groenewald to undertake a field inspection of the proposed Maraleng Sub Station site and report on any paleontological observations, conditionally prior to inception of any construction activities. He will further provide a chance-finds protocol for compliance by the appointed ECO, once construction is underway. His report and protocol will be loaded to the SAHRIS Case File once received by eThembeni CHM.

Any significant fossils identified during the field inspection will be the subject of Phase 2 mitigation and application for the relevant permits from SAHRA, for the collection and curation of such fossils.

I trust that the foregoing explanations clarify the varying T.o.R and scope of heritage assessment that has been undertaken on this project over the preceding 5 years.

We further request that SAHRA approve that the DEA issue a R.o.D for the project, conditionally subject to Dr Groenewald conducting a field inspection and providing a chance-finds protocol prior to the inception of any preparatory earthworks and construction activities at the Sub Station site.

Sincerely



Len van Schalkwyk
Principal Practitioner.

² Groenewald, G.H. 1989. Stratigrafie en sedimentologie van die Groep Beaufort in die Noordoos-Vrystaat. *Geological Survey of South Africa*, Bulletin 96, 62 pp.