

Ecological Impact Assessment Comment and
Responses DEA, Roodeplaat Wind Energy Facility,
Eastern Cape, South Africa



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Prepared by

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For

SRK

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Dear Rob Gardiner,

Please find below my responses to the comments by DEA.

1 Comments by DEA as summarised by SRK

1. Comment on the significance of any differences between the project description in the FEIR and that in your report. In particular, please consider the number and layout of turbines, the internal road layout, and the powerline alignment alternatives. Attached is a google earth kmz file of the development footprint described in the FEIR. In the event that there are differences between the attached footprint and the project that you have assessed, please highlight what these are and comment on:
 - a. whether the differences fall within the area you have assessed;
 - b. whether the significance ratings in your report are still valid or if not, what the amended significance rating (or any element thereof) would be; and
 - c. what changes (if any) need to be made to the mitigation measures proposed in your report;

If there are no significant differences between the two project descriptions, then we need a definitive statement confirming this.

2. Provide a statement regarding the adequacy of field work in preparing your report. We have operated on the assumption that each specialist has conducted sufficient fieldwork on which to base her/his conclusions, significance ratings, and mitigation measures. In some cases specialists have highlighted the need for additional studies, which we have understood to be studies required after environmental authorisation and prior to construction (as opposed to additional studies required to inform significance ratings). Please ensure that your statement addresses these items (i.e. fieldwork and additional studies);
3. One specialist noted that access to an area was not possible due to a locked gate. There is a concern that specialists might have been deliberately barred from accessing areas that they needed to in order to perform their assessments. Similar to the preceding point, we have assumed that specialists were able to access all parts of the site that they needed to in order to reach the conclusions in each report, or alternatively, were able to reasonably infer the conditions on portions of the site they weren't able to access due to, for example, terrain. Please indicate in your response whether or not you were deliberately prevented access to any portion of the site and where direct inspection was not possible, what the reasons for this were and what the impact of this is on the validity of conclusions in their reports;
4. For the ecological study, please look at the wording of the assumptions and limitation section, and in particular the following:
 - a. "This assessment is an update of the existing ecological work on the site, rather than an exhaustive study". The impression is created here that a more

exhaustive study needs to be conducted for the purposes of the EIA. As your study builds on the CES study, and as that study also had fieldwork, the question is whether this study is more (or less) detailed than similar EIA studies;

- b. “Species of Conservation Concern are present on site, a full list of these species can only be generated through an assessment specifically designed to do so” We have brought it to DEA’s attention that the CES’s and your fieldwork were conducted at different times of the year, and that your included a statement that that this “allowed for the production of a species list representative of the entire study area”;
- c. “Powerline impacts are assessed based on desktop information.” Similar to the point above, please confirm whether *this in your view is sufficient for decision making or whether additional fieldwork is required* for the powerline alignments in this report (i.e. excluding any further possible alignments).
- d. “Whilst a list of possible mitigation measures are provided, the ecological assessment also recommends that a further assessment is required”. Also similar to point 2 above. You have also made reference to optional studies, and it would be good if you could clarify whether or not you expect these to be conducted in order to support the FEIR, after construction, or whether at the Applicant’s discretion.

2 Responses to comments

1. The WEF and associated infrastructure are the same as follows:
 - a. Turbine positions -identical
 - b. Roads within the WEF - identical
 - c. Farm boundaries - identical
 - d. Buildings, laydown areas etc. - identical
 - e. Powerline route options - identical

It follows that there is no difference between the layout presented in the Terrestrial Ecology report and the layout in the EIR.

2. Methodologies and statements regarding further studies are standard. As such, the following is relevant:
 - a. Adequate fieldwork and site visits were conducted to be able to assess the impacts of the proposed WEF on the terrestrial biodiversity of the project area and surrounds.
 - b. In order to produce a comprehensive species list, and a comprehensive list of Conservation Important Species, another study needs to be done. This study is conducted **after the EIR is approved and prior to construction**. This study ensures that all relevant permits are obtained before the removal, destruction or clipping of any protected species on any relevant lists including national and provincial lists. This is standard operating procedure.

- c. Additional studies are recommended only to add to the body of scientific knowledge on the impacts of WEFs, or the general area (such as the case of the ghost frog). **These recommended studies are not required for the EIR, nor for any further submissions to DEA, funders or stakeholders.**
 - d. In the case of the power line assessment further studies recommendations: any changes in the power line routes should be assessed in the field. However, **work currently done is sufficient to rate the impacts for the power line options presented in the EIR.**
3. Access to the entire site was possible, and the field work conducted as part of the terrestrial biodiversity assessment did not have any problems with access to the site.
 4. For the ecology report:
 - a. This assessment was additional work, it built on the work already conducted by CES. The two reports together form a comprehensive assessment for the requirements of the EIA and provide adequate information to rate impacts for the proposed development. It should be noted here that the methodology is standard (for both assessments) and the statement was included to indicate that the reports are to be read together (eliminating the need to reproduce the entire CES report within the additional report) and to ensure that the report is not mistaken as a complex scientific study (also standard).
 - b. Please see section 2b, above. Please also note that for all such assessments, an entire species list is not feasible to obtain at any point. This is because for one to be produced, the entire site would have to be assessed completely on foot at all times. This sampling results in a statistical sample of the site, which results in the majority of the species being recorded. Such information is sufficient to determine the vegetation communities present on site and develop a species list. Species of Conservation Concern are recorded where they are encountered for this study. This is standard practice. Should the WEF go ahead, permits will be required to remove any such species. As a result, these have to be mapped and listed. This need only be done after the EIR is approved but prior to construction.
 - c. Power line impacts are assessed based on desktop information. This is adequate to determine impacts for this study. However, it is recommended that further alignments are assessed in the field.
 - d. Please see 2c above.

I trust you will find all questions adequately answered.

Yours sincerely,



Leigh-Ann de Wet