

Reece, Claire

From: Brian Reeves <Brian.Reeves@ecpta.co.za>
Sent: 10 November 2014 09:42 AM
To: Marais, Wanda
Cc: Wayne Erlank; Bev Geach
Subject: RE: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP

Hi Wanda

Could you confirm that you have records of input provided by the ECPTA on this proposal?

We would like to reiterate that we are opposed to the development of a wind farm adjacent to the Groendal Wilderness Area, which will soon be incorporated into the Baviaanskloof World Heritage Site.

Regards
Brian

Brian Reeves M.Sc. Pr.Sci.Nat.
Regional Ecologist: Western Region

Eastern Cape Parks & Tourism Agency
Tel: 041 364 2570
Cell: 071 605 5234
Fax: 041 364 2543 / 086 625 3320
Email: brian.reeves@ecpta.co.za

From: Marais, Wanda [<mailto:WMarais@srk.co.za>]
Sent: 07 November 2014 13:24
Cc: Gardiner, Rob; vchauke@environment.gov.za; messop@environment.gov.za
Subject: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP
Importance: High

Dear Authorities, Stakeholders and IAPs,

Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP
NEAS: DEA/EIA/001673/2013
DEA: 14/12/16/3/3/2/464

We would like to inform you of the change in the Environmental Assessment Practitioner for the proposed project. EOH Coastal and Environmental Services is no longer involved with the project and the Environmental Impact Assessment will forthwith be conducted by SRK Consulting .

All comments submitted previously to EOH Coast and Environmental Services have been provided to SRK and copies thereof will be included in the Final Scoping Report which will be released for public review shortly. All future queries, concerns or comments may be forwarded directly to me.

Reece, Claire

From: Nanna Gouws (SR) <GouwsJ@nra.co.za>
Sent: 07 November 2014 02:30 PM
To: Marais, Wanda
Subject: RE: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP

Good afternoon Wanda

Can you please forward a locality map of the proposed Ingeprop Inyana-Roodeplaat Wind Farm project to office.

Kind regards

Nanna Gouws
Tel: +27 41 398 3226
Fax: +27 41 398 3222

SANRAL Southern Region Offices
Block C, Southern Life Gardens,
70 Second Avenue, Newton Park, Port Elizabeth P.O. Box 27230, Greenacres, 6057 www.nra.co.za
SANRAL Fraud Hotline: 0800204558

From: Marais, Wanda [<mailto:WMarais@srk.co.za>]
Sent: 07 November 2014 02:22 PM
Subject: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP
Importance: High

Dear Authorities, Stakeholders and IAPs,

Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP
NEAS: DEA/EIA/001673/2013
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We will also continue to register IAPs throughout the process. Should you therefore be aware of anyone who may be interested in this EIA, you are encouraged to bring the proposed project to their attention.

Kind Regards,

Wanda Marais B Proc
Public Participation Practitioner

SRK Consulting (South Africa) (Pty) Ltd

Ground Floor, Bay Suites, 1a Humewood Rd, Humeral, Port Elizabeth, 6001

P O Box 21842, Port Elizabeth, 6000

Tel: +27-(0)41-509-4809; Fax: +27-(0)41-509-4850

Email: wmarais@srk.co.za

www.srk.co.za

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Tel +27-(0)12 844 8000, www.nra.co.za.

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Public Participation Practitioner



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Ground Floor, Bay Suites, 1a Humewood Rd, Humeral, Port Elizabeth, 6001

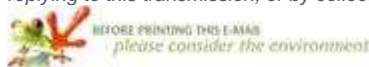
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Reece, Claire

From: Wouter Vermaak <wouter@retouw.co.za>
Sent: 07 November 2014 02:37 PM
To: Marais, Wanda
Subject: RE: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP

Hi Wanda

Thanks for the new information.

Can you perhaps tell me why the proposed site for wind farm is on such rough mountain area. My farm is the white block surrounded by this wind farm
The roads and better flat areas is on my farm and till now no person has contacted me to make my farm part of this wind farm

I would like to hear from you in this regard

Thanks

Wouter Vermaak

✉ 8
Hankey
6350
☎ 082 566 0405
☎ 086 647 2810
✉ wouter@retouw.co.za

From: Marais, Wanda [<mailto:WMarais@srk.co.za>]
Sent: 07 November 2014 01:24 PM
Cc: Gardiner, Rob; vchauke@environment.gov.za; messop@environment.gov.za
Subject: Proposed Ingeprop Inyanda-Roodeplaat Wind Farm Project near Uitenhage, Cacadu District Municipality, Eastern Cape: Notice of change in EAP
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We will also continue to register IAPs throughout the process. Should you therefore be aware of anyone who may be interested in this EIA, you are encouraged to bring the proposed project to their attention.

Kind Regards,

Marais, Wanda

From: Marc Hardy <m.hardy@cesnet.co.za>
Sent: 03 December 2013 08:17 AM
To: a.jackson@cesnet.co.za
Subject: FW: Inyanda Roodeplaat Wind Energy Project
Attachments: Elandsrivier Valleio3.jpeg

From: Briers [mailto:briers@wol.co.za]
Sent: Monday, December 02, 2013 6:43 PM
To: 'Marc Hardy'
Cc: 'lisedodd@gmail.com'; 'Susan Campbell'
Subject: FW: Inyanda Roodeplaat Wind Energy Project

Hi Marc,

Please include this picture taken from the south of the wind farm on our property, camera facing north east. The wind farm will be on the skyline on the right hand of the picture.

Regards

Marthinus

From: Briers [mailto:briers@wol.co.za]
Sent: 02 December 2013 06:36 PM
To: 'Marc Hardy'
Cc: 'Susan Campbell'; 'lisedodd@gmail.com'
Subject: RE: Inyanda Roodeplaat Wind Energy Project

Here are in short my comments on the proposed Wind farm.

Background

We brought the farm for its natural beauty and biodiversity. The area around the Kwazuga river is absolutely pristine unspoilt nature and should be protected. The Kwazuga river is on the foot of the Winterhoek mountain on which the windturbines are proposed to be erected. The Winterhoek mountain area affords the Port Elizabeth area a landscape as breathtaking as found in the Low-veld of Mpumalanga and can become the Nelson Mandela Bay's Table Mountain. It links Uitenhage with the Baviaanskloof and has great eco tourism potential. The existence of the Groendal Nature Areas is proof of the need to protect the area. It would be unforgiveable if the Groendal area is split with a Wind farm that will change the landscape and potentially devastating consequences for the environment..

At the foot of the Winterhoek mountain where the proposed turbine will be erected there are caves where Bushman lived. If you visit the area you can see why they chose to live here. Bushman drawings are found in some of the caves. The Kwazuga river offers one of the best hiking trails close to the Metro. The area contributes to the biodiversity of the Greater Baviaans Area.

The following should be investigated during the environmental assessment.

1. Heritage. Significance of the area for our heritage and the negative impact that windturbine project could have on the protection of the Bushman Caves, Bushman drawings and tourism potential of the area. A full heritage assessment needs to be undertaken.
2. Biodiversity. Investigate the impact of the construction and operational phase on the biodiversity of the Greater Baviaanskloof Area. Take in account the risk of erosion and disturbance of habitants during the construction phase. Investigate the long term consequences for biodiversity conservation.
3. Effect the workforce will have on the protection of Cycads in the area. We have hundreds of natural Eastern Cape Cycads alone on our property which borders the study area. It will be impossible to control movement of people in the area. These valuable plants could be removed and sold. Presently there are a handful of farm workers in the area much further away from the majority of the plants and there was no need for policing of the plants to date.
4. It is important to expand the study to the surrounding area and not just the study area as is planned as there is minimal fencing and area is part of an eco system that stretches from Uitenhage into the Baviaanskloof . The potential impact on conservation corridors needs to be studied.

5. The proposed development is a significant distance from the existing power lines. The impact of the additional power lines needs to be fully investigated, including:
 - a. The visual impact
 - b. The impact on the sense of place
 - c. The impact of the clearance of vegetation under the additional power lines.
6. The cumulative impact of all the above factors needs to be assessed.
7. A strategic environmental impact assessment should first be undertaken to identify suitable sites for wind farms in the area. This can be undertaken as part of a review of the SDF.
8. A fine scale botanical study needs to be undertaken.
9. The impact of the roads and hard surfaces and the potential risk of erosion or land slips.
10. A full visual assessment needs to be undertaken from all areas where the turbines and the additional power lines will be visible.

Please reply to this email to acknowledge receipt.

Regards

Marthinus

From: Marc Hardy [mailto:m.hardy@cesnet.co.za]
Sent: 25 November 2013 10:29 AM
To: 'Briers'; a.jackson@cesnet.co.za
Subject: RE: Inyanda Roodeplaat Wind Energy Project

Sorry for the mistake Marthinus I was using the incorrect spelling in the search.

You are a registered IAP by virtue of being a neighbouring landowner and I recall your attendance at the meeting. Please note that all your issues and concerns raised in the meeting will be captured in the Final ESR that will be made available for your review and afforded the opportunity for additional comment. Please let us know once it is available if there are corrections required and we will do so accordingly. If it is of comfort please supply these in writing as well so as to ensure we are not missing anything. If you could supply these by Monday 2 December it would be appreciated.

Regards

Marc

From: Briers [mailto:briers@wol.co.za]
Sent: Monday, November 25, 2013 10:07 AM
To: 'Marc Hardy'
Subject: RE: Inyanda Roodeplaat Wind Energy Project

Hi Marc,

Thanks for informing.

I was under the impression that I was registered being at the meeting, filling in the register and being a next door neighbour. My name was on your scoping report list and I may have wrongfully assumed I am effected by the proposed development. It was also not clear to me from your communications that I had to register as an effected party.

Please could you let me know if my comments at the meeting will be recorded as an effected party as well as a member of the public. If not, I would like to send my comments in writing and request a postponement of the 24 November 2013 dead line for comments to enable me to comment.

Please could you register me. I am the sole owner of Ocean Echo Properties owner of RE/588 surrounded by the study area and properties indicated on your map. PO Box 13168 Humewood 6013. email briers@wol.co.za, contact number 0834544881

20 November 2013

Attention: Justin Green, Coastal and Environmental Services

Sent via email: j.green@cesnet.co.za

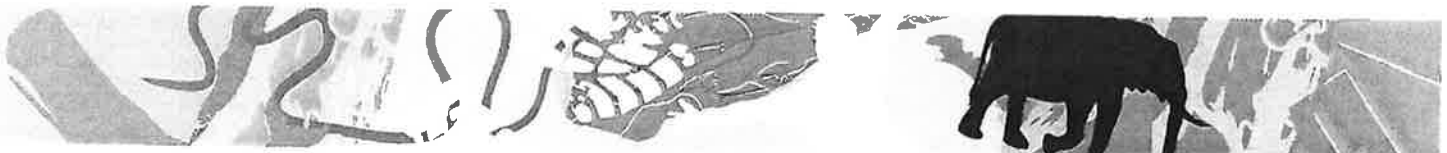
Dear Justin

Re: Proposed Inyanda – Roodeplaats Wind Energy Project located in Sundays River Valley Municipality, Cacadu District, Eastern Cape Province. DEA Reference No. 14/12/16/3/3/2/464

Thank you for the opportunity to comment on the Draft Environmental Scoping Report for the proposed Inyanda – Roodeplaats wind farm. Note that ECPTA submitted comments via email to Ms Amber Jackson on 18 June 2013 (a.jackson@cesnet.co.za) during the early scoping phase of the EIA process, and met with CES on 26 July 2013. At that time ECPTA strongly objected to this proposed development due to its locality and likely impacts on biodiversity and landscape values, with particular reference to the World Heritage Site status of the Baviaanskloof. These comments and the objection stand.

The Draft Environmental Scoping Report notes that the landowner is interested in game farming, is aware that the properties are in an important corridor between protected areas and is interested in discussing a biodiversity offset. ECPTA recognizes the importance of shifting to a more sustainable energy mix, and strongly supports entering into partnerships with landowners in protected area expansion priority areas. However, due to the high level of sensitivity of the proposed development site and its surrounding, this development is definitely not one that ECPTA can support. ECPTA remains of the opinion that the proposed development is fatally flawed and recommends that this should be conveyed to the developer as soon as possible.

This opinion is based on the location of the properties relevant to important protected areas, the topography and the biodiversity. The impacts are likely to be very high, and cannot be mitigated.

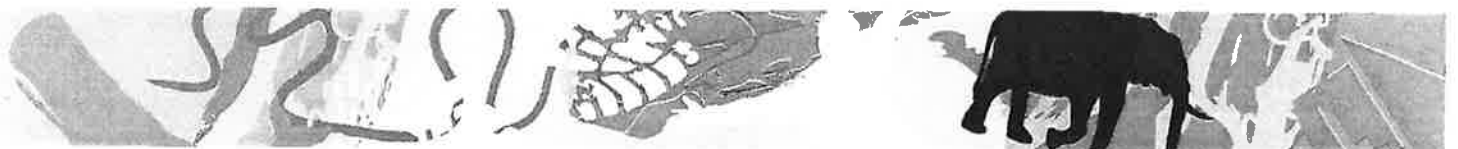


As noted before, the site is in the Groot Winterberg Mountains and lies between three nature reserves (Groendal, Stinkhoutberg & Mierhooplaat) and the Baviaanskloof section of the Cape Floristic Region World Heritage Site (CFR WHS). Both Stinkhoutberg and the Groendal Wilderness Area are included in a proposed extension to the CFR World Heritage Site. The extension document for the CFR WHS has been submitted to DEA as well as to UNESCO prior to submission to the World Heritage Convention for inscription in February 2014. The site may also fall within the current 10km buffer of the Baviaanskloof WHS.

From the top of the plateau at Groendal Wilderness Area (which form part of the network of hiking trails) there is a completely uninterrupted view all the way to the Baviaanskloof (Cockscomb peak). The presence of up to 35 wind turbines of more than 120 m in height right on the boundary of Groendal (the closest one is less than 100 m from the boundary) will have a very high impact on landscape aesthetics, views and sense of place of these protected areas (declared as wilderness areas) and is impossible to mitigate.

The site is situated in a priority area identified in the Eastern Cape Protected Area Expansion Strategy (ECPAES), and a portion of the site falls within a Critical Biodiversity Area (CBA) 1 as identified by the Eastern Cape Biodiversity Conservation Plan. Most of the remainder is in a CBA 2. Portions of the site are also identified in the Baviaanskloof Conservation Plan as CBA 1 and 2. The Draft Environmental Scoping Report does consider the outcomes of planning products such as SKEP and NPAES but these are outdated and the environmental assessment should rather refer to more recent conservation strategies such as the ECPAES and the fine-scale conservation plan for the Baviaanskloof.

The list of specialist studies to be conducted as part of the EIA is noted. The Draft Environmental Scoping Report states that an ecological impact assessment will be carried out, in addition to the specialist avifaunal and bat assessments. It is suggested that, in addition to fauna and flora, the ecological impact assessment should also look at the broader catchment implications of the proposed development. Currently there are hardly any roads in this area and the terrain is very steep and rugged. The developers will need to build a very complicated network of roads (with detours around the N-S orientated gorges) to service turbines and this will could have severe impacts (clearing of vegetation, erosion, increase sediment load in rivers, pathways for invasions of alien species). As noted, the proposed area is a mountain catchment and includes the source of the Kwazungu River which feeds Groendal Dam, which is the main water reservoir for Uitenhage domestic water supply.



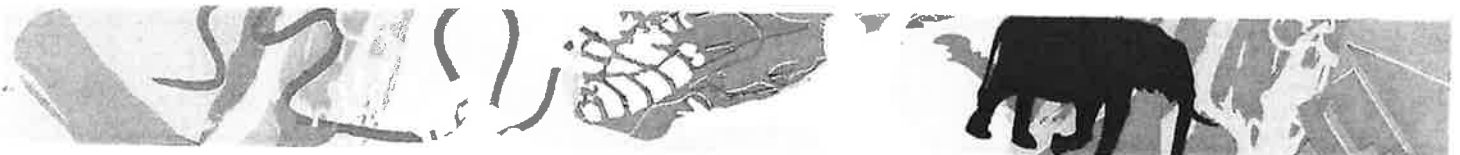
ECPTA is concerned about the threatened species which are likely to be impacted by this project, which is also highlighted in the Draft Environmental Scoping Report. However, the Draft Environmental Scoping Report notes that no frog species of conservation concern occur in the project area. The proposed site is a possible locality of Hewitt's ghost frog which is classified by the IUCN as Endangered and which has a very limited distribution. It is only known from five localities. The proposed area has not been surveyed for ghost frogs but there is a real possibility that they could occur there. The construction of roads, subsequent erosion and stream siltation can threaten the habitat of this species. In addition, the area around Groendal is a stronghold of African crowned eagle and probably has some of the highest densities across its range (inter-nest distance of about 2.5 km). This species is long-lived and slow to reproduce (breeds every second year) and mortality from collisions with wind turbines could have a big impact on the local population. There are also possible impacts on other birds moving between upland and lowland areas. The draft scoping report notes the possible presence of Elandsberg dwarf chameleon (listed as critically endangered). Note too that the presence of Smith's dwarf chameleon (listed as endangered), which inhabits the grassy fynbos areas – exactly where the development is proposed. The high numbers of threatened (critically endangered, endangered and vulnerable) species on this site is something that should be highlighted as a fatal flaw.

ECPTA strongly encourages that CES facilitate an authorities meeting where DEDEAT, DEA, DWA and DAFF are present, in order to discuss these concerns and to work on a way forward.

Regards



Dr Dave Balfour
Executive Director: Biodiversity Conservation



Marais, Wanda

From: Samantha Ralston <energy@birdlife.org.za>
Sent: 28 November 2013 11:28 AM
To: 'Roodeplaat Wind Energy'; a.jackson@cesnet.co.za
Cc: advocacy@birdlife.org.za
Subject: RE: Roodeplaat Wind Energy
Attachments: BLSA_EWT_Best Practice Monitoring Guidelines_2012.pdf; Wind Energy Minimum Assessment Requirements 4 April.pdf

Dear Ms Jackson

BirdLife South Africa would like to thank you for the opportunity to comment on the draft Scoping Report for the proposed Roodeplaat Wind Energy Facility. We apologise for missing the deadline for comment, but hope that you will be able to incorporate our input into the next phase of the assessment.

BirdLife South Africa supports the responsible development of wind energy in South Africa. While wind energy can have negative impacts on birds and their habitats, these impacts can be minimised with careful planning and assessment. The considered location of the wind farm itself and the location turbines within the wind farm are both critical factors in determining the significance of the impacts on birds. To this end BirdLife and its partner the Endangered Wildlife Trust have developed Best Practice Guidelines to guide the impact assessment and monitoring of birds at wind farms (see attached). These guidelines address both impact assessment and post-construction monitoring. For ease of reference we have summarised the requirements for impact assessment in the attached Minimum Requirements for Avifaunal Impact Assessment for Wind Energy Facilities.

While it would have been useful to have included an avifaunal Scoping Report and the proposed avifaunal assessment methodology in the Scoping Report, we trust that our guidelines will help guide the impact assessment.

Based on the information currently available, we would like to note that the area is potentially sensitive to the impacts of wind energy. The proposed facility lies just north of the Kouga-Baviaans Complex Important Bird and Biodiversity Area. A number of species vulnerable to the impacts of wind energy have been recorded in the area. These include African Crowned Eagle, African Fish-Eagle, Black Harrier, Black-shouldered Kite, Blue Crane, Denham's Bustard, Forest Buzzard, Jackal Buzzard, Martial Eagle, Spotted Eagle-Owl, Steppe Buzzard and Verreaux's Eagle. It is therefore critical that the impacts of the proposed facility on birds are carefully assessed. The importance of the proposed wind farm site for these birds must be understood and the risk of collision, habitat loss and displacement is considered.

We also note the proposed wind farm is located between the eastern and western portions of the Groendal Nature Reserve. The compatibility of these two land uses should be carefully considered.

We look forward to receiving the more detailed reports for review. Please do not hesitate to contact us should you wish to discuss our comments further.

Yours sincerely

Samantha Ralston

Samantha Ralston
Birds and Renewable Energy Manager



Giving Conservation Wings

Winter Palace, Kirstenbosch Botanical Gardens, Newlands, Cape Town

Winter House, Private Bag X7, Claremont, 7735
Cell: +27 (0) 83 673 3948
E-mail: energy@birdlife.org.za
<http://www.birdlife.org.za> <http://www.birdingroutes.co.za>

Sponsored by



BirdLife South Africa's Birds and Renewable Energy work is supported by Investec Corporate and Institutional Banking.

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SMS 'birdlife' to 38878 and help Give Conservation Wings

R10 per SMS. Free SMS and SMS bundles do not apply. All proceeds, less service provider fees, will be donated to BirdLife South Africa. Error messages will be billed. More details on BirdLife South Africa website.



From: Roodeplaat Wind Energy [<mailto:info=cesnet.co.za@mail28.wdc03.rsgsv.net>] **On Behalf Of** Roodeplaat Wind Energy
Sent: 14 October 2013 04:28 PM
To: Samantha Ralston
Subject: Roodeplaat Wind Energy

Coastal and Environmental Services



**67 African Street
Grahamstown
6139**

046 - 622 2364

14 October 2013

To all

Stakeholders and Interested and Affected Parties (IAPs)

**NOTIFICATION OF RELEASE OF DRAFT ENVIRONMENTAL SCOPING REPORT
(DSR) FOR THE PROPOSED DEVELOPMENT OF INYANDA - ROODEPLAAT WIND
ENERGY PROJECT**

(DEA EIA Reference number: 14/12/16/3/3/2/464):

In accordance with the requirements of section 54 (2) (b) (vi) of the Environmental Impact Assessment Regulations (2010) made in terms of section 24(5) of the National Environmental Management Act (Act No 107 of 1998) as amended, we are required to, "give written notice to any organ of state having jurisdiction in respect of any aspect of the activity". In accordance with this requirement, please find here-with a letter of notification for an environmental impact assessment being carried out by Coastal and Environmental Services in respect of the above-mentioned project.

Inyanda Energy Projects (PTY) LTD (Inyanda Energy), a renewable energy company, plans to develop a wind energy facility between the towns of Patensie and Kirkwood, within the Sundays River Valley Municipality, Eastern Cape Province, South Africa. The proposed project will entail the construction and operation of approximately 35 wind turbines, with a maximum generating output of up to 140 MW. The proposed development will cover an area of 60 hectares.

All Interested and Affected Parties are hereby notified of the availability of the Draft Scoping Report for public review and comment. The review period is from 14 October 2013 to 24 November 2013. Copies of the Draft Environmental Scoping Report (DSR) are available for review and comment at the following locations:

- Ø Port Elizabeth Public Library (Market Square, Govan Mbeki Avenue, PE)
- Ø Uitenhage Public Library (Market St, Uitenhage Central, Uitenhage)
- Ø Kirkwood Public Library (Middelstraat, Kirkwood)
- Ø The CES website (www.cesnet.co.za) – click on the public documents link.

Public meetings will be held at the:

- **Port Elizabeth:** Feather Market Hall (Baakens Room) on Wednesday 23 October 2013 at 12:00. The Room is located at the Cnr. Baakens Street and Military Road, Central
- **Kirkwood:** Kroonenhoff Guesthouse on Wednesday 23 October 2013 at 18:00. The guesthouse is located at 1 Sonop Street, Kirkwood.

Yours sincerely,

Justin Green

Environmental Consultant

Coastal & Environmental Services

This email was sent to energy@birdlife.org.za

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CES - Coastal and Environmental Services · 67 African St · PO BOx 934 Grahamstown · Grahamstown, Eastern Cape 6140 6139
· South Africa



Comment of the Elands River Conservancy (ERC) on the Draft Environmental Scoping Report (DESR) of the proposed Inyanda - Roodeplaat Wind Energy Project, Sundays River Municipality, Cacadu District, Eastern Cape Province of South Africa
DEA Reference Number: 14/12/16/3/3/2/464. (23 November 2013)

The ERC consists of 33 landowners and covers 11,600 HA.
The ERC borders the proposed wind farm on the Eastern, South- Eastern and South- Western side.

At the meeting mentioned below the ERC was granted a 2(two) week extension period to comment on the abovementioned scoping report due to failed communication from Coastal and Environmental Services.

The ERC, although being registered as an interested and affected party, did not have the opportunity to comment on the proposed development therefore its comments are not included in the Draft Environmental Scoping Report that was made available at a meeting called by Coastal and Environmental Services, held in the Feather market Hall on the 23rd of October 2013 for interested and affected parties of the proposed project (the ERC was at a very late stage informed of this meeting by a member of the public).

Renewable energy

The ERC strongly supports the development and use of environment friendly renewable energy sources, however these developments still need to be handled responsibly and with the least possible detrimental effect to the environment - in particular the location of sites.

VISUAL IMPACT

About 40 years ago the Elands River was one of the Eastern Cape's largest wheat producers.

- * Due to a change from a predominantly winter rainfall to rain throughout the year with no consistent pattern, farmers were forced to look for alternative methods of generating an income.
- * For many residents, both established and new, tourism became an income-generating opportunity as the Elands River Valley is a **gateway to the Baviaanskloof Wilderness Area and borders on the Groendal Wilderness Reserve.**
- * During the past 10 years, residents have developed eco-tourism related ventures and it is also one of the aims of the Elands River Conservancy to develop this further.
- * Eco-tourism relies heavily on visual aesthetics and biodiversity.

Annexure A includes some of the activities offered commercially in the valley.

GEOGRAPHICAL INFO

The Elands River Valley's geographical structure consists of undulating hills, extensive deep kloofs with dense undisturbed, indigenous vegetation.

- * This geomorphology complicates the erection of any large structures over extended distances and makes access to the same for maintenance cumbersome and costly. Due to the geographical structure, building large structures on the proposed farm will have a much larger surface impact since the true distance is considerably bigger, resulting in disturbance of many more plant and animal species than would be the case on flat land.
- * The steep slopes in the valley raise the risk of soil erosion on any disturbed areas considerably.

AVIFAUNA IMPACTS

Included in Annexure B is a list of birds positively identified in the Elands River Conservancy. The list was compiled with the help of BirdLife Eastern Cape which uses the farm Hillingdon as a bird watching venue.

- * Of the total number of 135 species identified at this location, 25 species are endemic, which means that they do not occur naturally anywhere else in the world.
- * According to studies done by Heroldt (1988); Johnsgard (1991) and Allan (1997), the collision of large terrestrial birds with the wires of utility structures, and especially power lines, has been determined to be one of the most important mortality factors for this group of birds in South Africa.
- * Certain groups are more susceptible to collisions, namely the species which are slow fliers and which have limited maneuverability as a result of high wing loading (Bevanger 1994). Birds that regularly fly between roosting and feeding grounds, undertake regular migratory or nomadic movements, fly in flocks or fly during low-light conditions are therefore also particularly vulnerable (Anderson 1978; APLIC 1994).

As shown in Annexure B, the Elands River Valley hosts many species that will be endangered by the erection of huge structures:

- * Of significance are various species of ducks, wild geese, raptors and owls.

The White Stork, Stanley's Bustard and the Blue Crane are some of the species that have been identified as vulnerable to collisions.

- * The latter is listed in The Eskom Red Data Book of Birds of South Africa, Lesotho and Swaziland (Barnes 2000) as *vulnerable*. The National Environmental

Management Act 2204 (act 10 of 2004), however, lists the Blue Crane as an *endangered* species.

During the erection of wind farms

* Habitat destruction and alteration inevitably takes place.

* Many birds are highly susceptible to disturbance

and should this disturbance take place during or just prior to the chick fledging period, it could lead to temporary or permanent abandonment of the nest by the adult birds, or premature fledging with fatal results for the chick.

Neil Evans, a member of the ERC has reported two breeding pairs of **Black Eagles** in the vicinity of his farm bordering the proposed wind farm.

* Such a sequence of events can have far-reaching implications for certain large, rare species that only breed once a year or once every two years.

* As the Elands River Valley has prolific bird life, the Elands River Conservancy actively protects bird breeding sites.

* It should also be noted that although certain species might not be protected or endangered, only a handful of them (in some instances only one pair) are resident in the Valley. If any one of these birds are "lost" it could mean their **extinction** in the valley.

FAUNA

Annexure C contains a list of mammals found in our area, but this list shows only a fraction of the wildlife in the area since reptiles and invertebrates are not included.

***Of the less common mammals that roam the Elands River Valley are: Klipspringer, Blue Duiker, Grysbok, Cape Mountain Leopard, Mountain Reedbuck, Aardvark, Bushbuck, Honey Badger, Snake mongoose, Aardwolf and Elephant Shrew.**

* The Mountain Reedbuck's habitat is restricted to bushy, mountainous areas, thus having an ideal habitat in the Elands River Valley and neighboring Baviaanskloof Wilderness Area and Groendal Nature Reserve. The Reedbuck is a protected species.

* The Klipspringer, Grysbok and Bushbuck ewe are also protected.

* The Blue Duiker is an endangered species. It is the smallest of all buck species in South Africa and is also endemic. It is extremely sensitive to any disturbance of its habitat.

* For the first time in many years, the Elands River Valley has Kudus and we attribute this to the mutual effort of our residents to conserve and hunt responsibly.

* The Cape Mountain Leopard is a vulnerable species, and the Elands River Valley has a Leopard committee working with Nature Conservation officials to look at ways of protecting farm stock as well as the leopard.

* Due to the fact that the Valley has an erratic pattern of all-year rainfall, many

interesting invertebrates are found here. They form an integral part of the biotic co-habitation which is of the utmost importance to our ecosystem. Some of the protected species encountered in the valley are ***Opisthacanthus spp* (Creeping Scorpions) and *Harpactira spp* (Common Baboon Spider)**. Researchers are currently emphasizing the importance of the **Cape Mountain Cockroach** in the eco-system. This insect is found in the mountains of the Elands River Valley.

* A diversity of reptiles are seen in the area, including tree snakes and different kinds of adders. Although ordinary, they play a vital role in rodent control in the ecosystem.

* Of great importance is the **Smith's Dwarf Chameleon** that is a protected species. This species is currently under a lot of pressure.

FLORA

* Included in Annexure D is a list of trees positively identified in the Elands River Valley. A list of special trees, rare and endemic to a corner of the Eastern Cape is also attached.

These lists were compiled by Jenny Eldridge, an arborist and member of the Elands River Conservancy.

* The cycad species *Encephalartos longifolius*, which is found at several locations in the valley, is a protected species and a small clump of *Sterculia alexandrii* has been found on the slopes of Moordenaarskop in the Elands River Valley.

* The Elands River Valley boasts many species of Aloes as well as Proteas, Leucadendrons, Leucospermums, Ericas and other Fynbos species. The Botanical Society of Port Elizabeth, after visiting only the farm Hillingdon, advised that a specialist should draw up a comprehensive list of the fynbos in the Elands River Valley in order to identify all the species.

Logistics

The Elands River Road is a gravel road used by tourists to and residents from the Elands River Valley. The road is not properly or regularly maintained, therefore any increased and especially heavy traffic will greatly deteriorate the condition of the road.

In addition the road can at many places only accommodate a single lane of traffic making access problematic.

CONCLUSION

The proposed wind farm will hold no advantages to the residents of the Elands River Valley. A community 80km further will reap the benefits as stated in the DESR.

Local labour cannot be used for external contractors since the Elands River community has a limited workforce for existing employment. This means that

contractors will have to employ strangers in the area who could notice our daily routines, observe our area and we may become a target of criminals

On the 7th of November 2013 a farm attack occurred in the area

due to a farmer using labour from outside the valley. The Elands River

community actively strives to avoid situations that pose a security threat to residents.

* We accept the fact that there is a need for additional electricity (whether for local use or export).

* The supply of additional electricity can however not be achieved at the expense of the environment and enrichment of a single landowner. All our natural resources, including plant-, bird-, and wildlife, are under constant pressure of so-called infrastructure development.

* This generation has the responsibility to protect and conserve what is left of our environment. If we allow the wrong decisions to be made now, this ecological heritage close to the metropolitan area of the NMMM will be lost forever.

* The Conservancy foresees that it will become part of the linking corridors for the planned Mega Reserve including the Addo Park and the Baviaanskloof Wilderness Area. Constructing a wind farm of the proposed scale will have a negative impact on this vision.

* The Elands River Conservancy will do everything in its mandate to protect our environment and it is therefore its proposal that other more suitable sites be investigated.

List of references used:

Barnes, K.N.(ed) 2000. *The Eskom Red Data Book of Birds of South Africa, Lesotho and Swaziland*. BirdLife South Africa, Johannesburg.

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Monnig, H.O. 1954. *Handboek oor Veetiesktes*. Kaapstad, Tafelberg-Uitgewers.

National Environmental Management: Biodiversity Act, 2004(act 10 of 2004):

Publication of Lists of Critically Endangered, Endangered, Vulnerable and Protected Species.

Sinclair, I. 1993. *Birds of Southern Africa*. Cape Town, Struik.

Van Wyk, B. 1997. *Field Guide to Trees of Southern Africa*. Cape Town, Struik.

BIRDS - CHECKLIST		
	ENGLISH	AFRIKAANS
8	Dabchick	Kleindobbertjie
55	Whitebreasted (Great) Cormorant	Witborsduiker
58	Reed Cormorant	Rietduiker
62	Grey Heron	Bloureier
71	Cattle Egret	Bosluisvoel
81	Hamerkop	Hamerkop
83	White Stork	Witooievaar
94	Hadeda Ibis	Hadeda
102	Egyptian Goose	Kolgans
104	Yellowbilled Duck	Geelbekeend
105	African Black Duck	Swarteend
116	Spurwinged Goose	Wildemakou
118	Secretarybird	Sekretarisvoel
122	Cape Vulture	Kransaasvoel
127	Blackshouldered Kite	Blouvalk
136	Booted Eagle	Dwergarend
140	Martial Eagle	Breëkoparend
148	African Fish Eagle	Visarend
149	Steppe Buzzard	Bruinjakkalsvoel
150	Forest Buzzard	Bergjakkalsvoel
152	Jackal Buzzard	Rooiborsjakkalsvoel
158	Black Sparrowhawk	Swartspewer
169	Gymnogene	Kaalwangvalk
172	Lanner Falcon	Edelvalk
181	Rock (Common) Kestrel	Kransvalk
195	Cape Francolin	Kaapse Fisant
200	Common Quail	Afrikaanse Kwartel
203	Helmeted Guineafowl	Gewone Tarentaal
208	Blue Crane	Bloukraanvoel
231	Stanley's Bustard	Veldpou
255	Crowned Plover	Kroonkiewiet
297	Spotted Dikkop	Dikkop
349	Rock Pigeon	Kransduif
350	Rameron Pigeon	Geelbekbosduif
352	Redeyed Dove	Grootringduif
354	Cape Turtle Dove	Gewone Tortelduif
358	Greenspotted Dove	Groenvlekduifie
359	Tambourine Dove	Witborsduifie
370a	Knysna Lourie	Knysnalorie
377	Black Cuckoo	Swartkoekoek
378	Redchested Cuckoo	Piet-my-vrou
386	Diederik Cuckoo	Diederikkie
391a	Burchell's Coucal	Gewone Vleioerie
392	Barn Owl	Nonnetjie-uil
394	Wood Owl	Bosuil
400	Cape Eagle Owl	Kaapse Ooruil
401	Spotted Eagle Owl	Gevlekte Ooruil
405	Fierynecked Nightjar	Afrikaanse Naguil
415	Whiterumped Swift	Witkruiswindswael
418	Alpine Swift	Witpenswindswael
424	Speckled Mousebird	Gevlekte Muisvoel
426	Redfaced Mousebird	Rooiwangmuisvoel
427	Narina Trogon	Bosloerie
428	Pied Kingfisher	Bontvisvanger
429	Giant Kingfisher	Reuse Visvanger
432	African Pigmy Kingfisher	Dwergvisvanger
435	Brownhooded Kingfisher	Bruinkopvisvanger
446	European Roller	Europese Troupant
451	African Hoopoe	Afrikaanse Hoepoe
452	Redbilled Woddhoeopoe	Gewone Kakelaar
460	Crowned Hornbill	Gekroonde Neushoringvoel
464	Blackcollared Barbet	Rooikophoutkapper
476	Lesser Honeyguide	Kleinheuningwyser
486	Cardinal Woodpecker	Kardinaalspeg
488	Olive Woodpecker	Gryskopspeg
518	European (Barn) Swallow	Europese Swael
520	Whitethroated Swallow	Witkeelswael
526	Greater Striped Swallow	Grootstreepswael
527	Lesser Striped Swallow	Kleinstreepswael

BIRDS - CHECKLIST		
	ENGLISH	AFRIKAANS
529	Rock Martin	Kransswael
536	Black Saw-wing Swallow	Swartsaagvlerkswael
538	Black Cuckooshrike	Swartkatakoeroe
540	Grey Cuckooshrike	Bloukatakoeroe
541	Forktailed Drongo	Mikstertyvanger
543	European Golden Oriole	Europese Wielewaal
545	Eastern Blackheaded Oriole	Oostelike Swartkopwielewaal
547	Black Crow	Swartkraai
548	Pied Crow	Witborskraai
550	Whitenecked Raven	Withalskraai
566	Cape Bulbul	Kaapse Tiptol
569	Terrestrila Bulbul	Boskrapper
572	Sombre Bulbul	Gewone Willie
577	Olive Thrush	Olyflyster
581	Cape Rock Thrush	Kaapse Kliplyster
601	Cape Robin	Gewone Janfrederik
606	Starred Robin	Witkoljanfrederik
613	Whitebrowed Robin	Gestreepte Wipstert
616	Brown Robin	Bruinwipstert
645	Barthroated Apalis	Bandkeelkleinjantjie
648	Yellowbreasted Apalis	Geelborskkleinjantjie
657a	Greenbacked Bleating Warbler	Groen Kwe-Kwevoel
661	Grassbird	Grasvoel
669	Greybacked Cisticola	Grysrug Tinkinkie
679	Lacy Cisticola	Luitinkinkie
681	Neddicky	Neddikkie
686a	Spotted Prinia	Karoolangstertjie
690	Dusky Flycatcher	Donkervlieevanger
698	Fiscal Flycatcher	Fiskaalvlieevanger
700	Cape Batis	Kaapse Bosbontrokkie
710	African Paradise Flycatcher	Afrikaanse Paradysvlieevanger
713	Cape Wagtail	Gewone Kwikkie
727	Orangethroated Longclaw	Oranjekeelkalkoentjie
732	Common Fiscal Shrike	Gewone Fiskaallaksman
736	Southern Boubou	Suidelike Waterfiskaal
740	Blackbacked Puffback	Swartrugsnееubal
742	Southern Tchagra	Grysborstjagra
746	Bokmakierie	Bokmakierie
750	Olive Bush Shrike	Olyfboslaksman
757	European (Common) Starling	Europese Spreeu
764	Glossy Starling	Kleinglansspreeu
768	Blackbellied Starling	Swartpensglansspreeu
769	Redwinged Starling	Rooivlerkspreu
774	Cape Sugarbird	Kaapse Suikervoel
775	Malachite Sunbird	Jangroentjie
777	Orangebreasted Sunbird	Oranjeborssuikerbekkie
783	Lesser Doublecollard Sunbird	Klein Rooiborssuikerbekkie
785	Greater Doublecollared Sunbird	Groot Rooiborssuikerbekkie
789	Grey Sunbird	Gryssuikerbekkie
792	African Black Sunbird	Afrikaanse Swartsuikerbekkie
793	Collard Sunbird	Kortbeksuikerbekkie
796	Cape White-Eye	Kaapse Glasogie
801	House Sparrow	Huismossie
804	Southern Greyheaded Sparrow	Suidelike Gryskopmossie
808	Forest Weaver	Bosmusikant
813	Cape Weaver	Kaapse Wewer
824	Southern Red Bishop	Suidelike Rooivink
840	Bluebilled Firefinch	Kaapse Robbin
850	Swee Waxbill	Suidelike Swie
860	Pintailed Whydah	Koningrooibekkie
869	Yelloweyed Canary	Geeloogkanarie
872	Cape Canary	Kaapse Kanarie
873	Forest Canary	Gestreepte Kanarie
877	Bully Canary	Dikbekkanarie
881	Streakyheaded Canary	Streepkopkanarie
884	Goldenbreasted Bunting	Rooirugstreepkopie

Mammals

D

Black Backed Jackal
Cape Mountain Leopard
Lynx
Bushbuck
Blue Duiker
Elephant Shrew
Cape Fruit Bat
Vervet Monkey
Chacma Baboon
Snake Mongoose
Honey Badger
Cape Clawless Otter
Cape Grey Mongoose
Small Spotted Genet
White-Tailed Mongoose
Antbear
Rock Dassie
Bush Pig
Grey Duiker
Grysbok
Klipspringer
Grey Rhebuck
Mountain Reedbuck
Kudu
Cape Hare
Red Hare
Common Mole-Rat
Cape Porcupine
Striped Field Mouse
Aardvark

Tree List

16	PODOCARPUS FALCATUS	OUTENIQUA YELLOWOOD
20	WIDDINGTONIA NODIFLORA	MOUNTAIN CYPRES
39	CELTIS AFRICANA	WHITE STINKWOOD
139	PITTIOSPORUM VIRIDIFLORA	CHEESEWOOD
143	TRICHOCLADUS ELLIPTICUS	WHITE WITCH-HAZEL
201	SCOTIA AFRICANA	KAROO BOERBOON
204	SCOTIA LATIFOLIA	BUSH BOERBOON
253	ZANTHOXYLUM CAPENSE	SMALL KNOBWOOD
256	CALODENDRUM CAPENSE	CAPE CHESTNUT
261	VEPRIS LANCEOLATA	WHITE IRONWOOD
292	PTAEROXYLUM OBLIQUUM	SNEEZE WOOD
298	ELKERBERGIA CAPENSE	ESSENHOUT / ASHWOOD
307	LACHNOSTYLIS HIRTA	COALWOOD
365	LOXOSTYLIS ALATA	TARWOOD / TEERHOUT
380	RHUS CHIRENDENSIS	RED CURRANT
398	MAYTENUS ACCUMINATA	SILKY BARK
403	MAYTENUS UNDATA	KOKO TREE
409	PTEROCELASTRUS TRICUSPIDATUS	CANDLEWOOD
410	MYSTROXYLON AETHIOPICUM	KOOBOO BERRY
413	ROBSONODENDRON EUCLEIFORME	WHITE SILKY BARK
414	CASSINE PERAGUA	FOREST SPOONWOOD
415	ELAEODENDRON CROCEUM	FOREST SAFFRON
422	APODYTES DIMIDIATA	WHITE PEAR
431	SMELOPHYLLUM CAPENSE	BEND-ME-NOT / BUIG MY NIE
438	HIPPOBROMUS PAUSIFLORUS	FALSE HORSEWOOD / BASTER PERDEPIS
452	RHAMNUS PRINOIDES	SHINY LEAF / BLINKBLAAR
463	GREWIA OCCIDENTALIS	CROSS BERRY / KRUISBESSIE
479	OCHNA ARBOREA	CAPE PLANE
497.1	OCHNA SERRULATA	SMALL LEAVED PLANE
494	KIGGELARIA AFRICANA	WILD PEACH
498	SCHOLOPIA ZEYHERI	THORN PEAR
504	TRIMERIA TRINERVIS	SMALL LEAVED MULBERRY
553	EUGENIA ZEYHERI	EASTERN CAPE MYRTLE
564	CUSSONIA SPICATA	COMMON CABBAGE TREE
570	CURTISIA DENTATA	ASSEGAI
577	MYRSINE AFRICANA	CAPE MYRTLE
578	RAPANEA MELANOPHLOEOS	CAPE BEECH / BOEKEN HOUT
579	SIDEROXYLON INERMA	WHITE MILKWOOD
600	EUCLEA SHIMPERI	GLOSSY GUARRI
601	EUCLEA UNDULATA	COMMON GUARRI
611	DIOSPYRUS WHYTAENA	BLADDER NUT
615	CHIONANTHUS FOVEOLATUS	POCK IRONWOOD
617	OLEA EUROPEA s.p. AFRICANA	WILD OLIVE
618.2	OLEA CAPENSIS s.p. MACROCARPA	IRONWOOD
634	NUXIA FLORIBUNDA	FOREST ELDER / BOSFLIER
637	BUDLEJA SALVIIFOLIA	SAGEWOOD
639	ACOKANTHERA OPPISITIFOLIA	BUSHMAN'S POISON BUSH
688	BRUCHELLIA BABALINA	WILD POMEGRANATE
641	GONIOMA KAMASSIE	KAMASSIE
692	GARDENIA THUMBERGIA	FOREST GARDENIA
693	RÖTHMANIA CAPENSIS	WILD GARDENIA
708	CANTHIUM INERMA	TURKEY BERRY
710	CANTHIUM MUNDIANUM	ROCK ALDER / KLIPES
711	PSYDRAX OBOVATA	QUAR
726	BRACHYLAEANA GLABRA	MALABAR
733	TARCHONANTHUS CAMPHORATUS	CAMPBOR BUSH
736	CHRYSANTHEMOIDES MONILIFERA	TICK BERRY
SPECIAL TREES RARE AND ENDEMIC TO A CORNER OF THE EASTERN CAPE		
	STERCULIA ALEXANDRII	STAR CHESTNUT
	SMELLOPHYLLUM CAPENSE	BUIG-MY-NIE
	LOXOSTYLUS ALATA	TARWOOD
	WIDDINGTONIA NODIFLORA	MOUNTAIN CYPRUS
	ENCEPHALARTOS ALTENSTEINII	EASTERN CAPE CYCAD

RECREATIONAL ACTIVITIES AND TOURISM VENTURES: ELANDS RIVER VALLEY.

- 1 Landela Christian Camp: Accommodation and recreational activities.
- 2 Offcamber Adventures: Accommodation and recreational activities.
- 3 Monte Vista: Accommodation
- 4 Llise Dodd Art Studio: Art sales and art workshops
- 5 Sand River Getaway: Accommodation and recreational activities.
- 6 Mountain View: Accommodation and recreational activities.
- 7 Burrows: Accommodation and recreational activities.
- 8 Afdak: Conference Centrum and game farm.
- 9 Mount Ingwe: Boer war museum, accommodation, recreational activities.
- 10 The Meadows: Conference Centrum, 4x4 route, event organizing
- 11 Golden Grove Guest House: Accommodation
- 12 Wistaria: Organic Farm
- 13 Melkhoutboom: Rozelle Handmade Cheese
- 14 Tangle Woods: Conference Centrum, recreational activities



Province of the
EASTERN CAPE
**ECONOMIC DEVELOPMENT,
 ENVIRONMENTAL AFFAIRS
 AND TOURISM**
CACADU REGION

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Enquiries: Alan Southwood
 Ref: 14/12/16/3/3/2/464
 NEAS DEA REF#

Attention: Ms Tarry Martin,

DRAFT ENVIRONMENTAL SCOPING REPORT: PROPOSED INYANDA – ROODEPLAAT WIND ENERGY PROJECT: BETWEEN PATENSIE AND KIRKWOOD: SUNDAYS RIVER MUNICIPALITY: EASTERN CAPE

Your letter dated 14th October 2013 refers. This Department submits the following comments.

Page Number(s)	Section	Paragraph / Bullet	Comment
I	Header		Is there more than one volume of this report?
i	Background	Fourth Line	A summary of the "available wind data" should be included in the EIR to substantiate the statement "According to Inyanda, available wind data in South Africa shows this area to have favourable wind conditions sufficient to support a wind farm."
i	Table 1		Please indicate in which Registration Division each property is located; the size of the farm; the owner(s) of the farms.
i	Second Paragraph	Fourth Line	The batching plant should preferably be off-site and concrete brought in by trucks.
14	2.2 Detailed Description of the Proposed Project	Last Bullet	
60	Construction Phase	Fourth Column: Third Bullet	
ii	Figure 1		Important information was not included in the map, for example, boundaries of protected areas; existing power lines; existing substations; minor roads; rivers; catchments / sub-catchments; municipal boundaries.
4	Figure 1-1		
iii	Third Paragraph	First Bullet	Refer to comment on wind data on Page i.
iii	Third Paragraph	Third Bullet	Where are the nearest overhead lines and substation
iii	Third Paragraph	Fourth Bullet	How far is the site from the R75; what condition is the road in; what measures will have be taken to



			make it accessible to the vehicles transporting the wind turbine components?
iii	Third Paragraph	Fifth Bullet	Why is the fact that the area is "not densely populated" an important criteria for choosing the area?
iii	Third Paragraph	Second Last Bullet	<u>This Department does not support the construction of a wind farm so close to the Groendal Wilderness Area, in an area that is earmarked as part of the expansion strategy of the ECPTA, A CBA1 and in the catchment of the Groendal Dam.</u>
7	Conservation potential		
41-42	Table 4-5		
iv	Second Paragraph		There are future plans to use this area to connect the Baviaanskloof to Groendal. A wind farm would be incompatible with this. Who are the "key stakeholders" that were identified?
vi	Second Paragraph		The National Veld and Forest Fire Act (Act 101 of 1998) would most probably be applicable in this fire-type vegetation, namely Fynbos.
25	3.2.12 Other relevant legislation		
vii	Third paragraph		In what phase / stage is this project?
16	2.2.2 Stages of wind farm development		
viii	The Affected Environment	Climate	There is no discussion of wind regimes despite the fact that this is an application for a wind farm.
ix	The Affected Environment	Climate; Geology and topography; Current land-use	The <u>relevance</u> of these parameters to the project should be discussed in the EIR.
ix	Vegetation and flora	First Paragraph: Fourth line	Lubke <i>et al.</i> 1988 is not in the References (Page 90).
34	4.5 Floristics	First Paragraph: Fourth Line	
ix	Vegetation and flora	Second Paragraph	This is a pretty meaningless description. Most I&As will most probably not understand what is described here. There are no references for STEP and SKEP. Is SKEP actually relevant to this area?
x	Fauna	First Paragraph	Does the chameleon have any legal status in South African law?
x	Fauna	Second Paragraph: Second Sentence	All species are of conservation concern. This sentence needs to be reworded.
x	Fauna	Third Paragraph: Last sentence.	What are these three species?
x	Fauna	Fourth Paragraph	What relevance has this Paragraph to the project?
40	4.6.3 Mammals	First Paragraph	
x	4.6.3 Mammals	Fifth and Sixth Paragraphs	One of the reasons to expand the ECPTA's protected areas would be to provide more habitats for Leopards. The establishment of a wind farm would conflict with this objective.
40	4.6.3 Mammals	Two paragraphs under Table 4-4.	
68	6.2 Issues and	Second Row	

	Concerns Arising from PPP		
x	Fauna	Seventh Paragraph	What are these three species? Refer to Table 4.4 on Page 40.
x 40	Fauna 4.6.3 Mammals	Seventh Paragraph Second Paragraph: Last Line	Stuart and Stuart, 2007 are not in the References (Page 90).
xii	The Way Forward – EIA Phase		There should be a Transport Impact Assessment. Transportation of wind farm components at the wind farms presently being constructed are resulting in major traffic disruptions.
77	8.2 Specialist Study		
xvi	List of Abbreviations		CDE (refer to seventh reference on Page 90 of the Reference list).
1	1.1 Background to the Study	First Paragraph: Second Line	Where does the Wind Energy Farm get the name Roodeplaat from?
1	1.1 Background to the Study	First Paragraph: Fourth Line	There is no Figure 1 overleaf. It is on Page ii.
4	Figure 1-1		The map is too small. At this scale a lot of detail is lost. It should be provided at an A3 size at least. Refer to comments on Figure 1.
12	Figure 2-1		
9	1.6 Details and Expertise of the Environmental Assessment Practitioner	First Paragraph: Third Line	This is the Draft Scoping Report.
13	Figure 2-2		Indicate the road access to the north and the R75.
14	Header		The header refers to incorrect section of the report.
24	3.2.9 Electricity Regulation on New Generation Capacity	Last Paragraph: First Line	Dewey and Le Bouef, 2009 is not in the list of References.
25	3.2.12 Other relevant legislation		The Third and Fifth Bullets are duplicated.
25	3.2.12 Other relevant legislation	Third Bullet	How much of the ECA still applies?
26	3.2.12 Other relevant legislation	First Bullet	Does the Physical Planning Act still apply?
26	3.2.12 Other relevant legislation	Second Bullet	Does the Tourism Act still apply?
27	3.2.12 Other relevant legislation		The Mineral and Petroleum Resources Development Act (Act 28 of 2002) will apply.
28	4.1 Geology and Landform	Second Paragraph	Information <u>relevant</u> to the site should be provided. The last sentence is irrelevant.
29	Geology		References to substantiate this description would

			be appropriate.
29	4.2 Climate	Second Paragraph: First Line	Which scholarly article? Include it in the References and quote it in the text.
29	4.2 Climate	Second Paragraph: Fifth Line	Buckle, 1989 is not in the list of References.
29 to 30	Mucina and Rutherford		The first three paragraphs can be omitted. Just refer to the reference Mucina and Rutherford (2006). It would be appropriate to discuss that this is a Regional scale map (1:250 000?) and thus gives a general idea of the vegetation types.
30	Albany Alluvial Vegetation	Last Line	Delete the phrase "However, as with the Sundays River Thicket".
30	Kouga Grassy Sandstone Fynbos		It will be very important to discuss that fire is a dominant factor in the ecological processes in this vegetation type.
31	Figure 4-1		There is a correlation between altitude and topography, and vegetation type in the study area. The vegetation types should thus be depicted on a contour map. As is with the previous maps there is important information missing, particularly the locality of protected area.
35	Figure 4-3		
Pages 32 to 34	STEP and SKEP Projects		What is the relevance of describing three vegetation types? Unless there is really good reasons, Mucina and Rutherford should be adequate.
Page 34	Last Paragraph	First Line	IUCN is not in the abbreviations.
Page 34	Last Paragraph	Third Line	Is this the South African or IUCN Red Data List? Which version of the Red Data List was consulted?
Page 34	Last Paragraph	Fifth Line	The term "Conservation Body" is inappropriate. The first column in Table 4 mostly actually refers to legislation (NEMBA, CITES, PNCO and Protected Trees). Only the IUCN is conservation body: an international NGO. A brief explanation of this legislation and the IUCN in the context of SSC would be appropriate as the terminology could be confusing to I&APs.
Page 34	Last Paragraph	Last Line	SIBIS, 2013 is not in the Reference List. Where is Appendix A?
Page 36	Table 4-2.		The IUCN column should be deleted as the third column describes the IUCN Red Data Status of the species. Is this the S A Red Data List? Critically Rare should read Critically Endangered. If there is no TOPs (NEMBA) or Protected Trees why include these columns in the Table?
37	Amphibians	Third Line	Keeping to the <u>relevance</u> of information for the project is important (malaria and bilharzia in this area?).
37	Amphibians	Fourth and Sixth Lines	Phillips, 1994 and Poynton and Broadley, 1991)



			are not in the Reference List (Page 90). There should be more current references than these.
38	4.6.2 Birds	First Paragraph	Information should <u>relevant</u> to this specific project.
38	4.6.2 Birds	Table 4-3	Is this Red Data List the South African or IUCN version?
38	4.6.2 Birds	Paragraph below Table 4-3	Is 1998 the correct date? The date of Birdlife Africa in the Reference List is 2012.
39	Figure 4-4		As is with the previous maps there is important information missing, particularly the locality of protected areas. The reproduction of the maps was poor and certain information is illegible. It should be provided at an A3 size at least. Refer to comments on Figure 1.
49	Figure 4-7		
52	Figure 4-8		
74	Figure 7-1		
75	Figure 7-2		
40	4.6.3 Mammals	Second Paragraph	
40	Table 4-4	IUCN Column	Are these from the South African or IUCN Red Data Species lists? PNCO and CITES columns should be added to Table 4-4.
41	Table 4-5	First Row: Protected Areas: Right Hand Cell: Third Paragraph	Section 4.2 describes Climate.
41	Table 4-5	Second Row; Protected Areas Expansion Strategy	NPAES and PAES are not in the Abbreviation list. Give a brief explanation of these strategies.
41	Table 4-5	Second Row; Protected Areas Expansion Strategy: Right Hand Cell: Third Paragraph	Section 4.3 describes Current Land-use.
41	Table 4-5	Third Row: National Wetlands Inventory	Routes to cross drainage lines must be chosen very carefully with measures to mitigate the impacts.
40	Table 4-5	Fourth Row: National List of Ecosystems	Include this Regulation as an Appendix to prove that no threatened ecosystems occur within the site.
42	Table 4-5	Third Row: STEP: Right Hand Cell: Third Paragraph	Section 4.4 describes Vegetation of the Study Area.
43	4.7.2 Protected Areas Expansion Strategy	Last Paragraph	This Department should be included in these discussions.
51	4.7.5 Baviaanskloof Reserve Cluster	Last Paragraph	
44	Figure 4-5		The information printed on the map is difficult to read. Is the eastern boundary of Groendal correct?
46 to 48	4.7.3 STEP Project		What is the <u>relevance</u> of STEP to this project?
50	4.7.4 ECBCP	First Paragraph, Last	Berliner <i>et al.</i> 2007 is not in the list of References.

		Line	
50 to 51	4.7.4 ECBCP		What is the relevance of ECBCP to this project?
51	4.7.4 ECBCP	Last Paragraph	What is the <u>relationship</u> between STEP, Muncina and Rutherford, and ECBCP?
51	4.7.5 Baviaanskloof Reserve Cluster	First Paragraph: Fourth Line	Boshoff, 2008 is not in the References.
51	4.7.5 Baviaanskloof Reserve Cluster	First Paragraph: Fifth Line	Groendal is a Wilderness Area.
51	4.7.5 Baviaanskloof Reserve Cluster	Second Paragraph	The Kwa-Zunga Section is part of Groendal Wilderness Area and Stinhoutberg Nature Reserve is an independent nature reserve.
51	4.7.5 Baviaanskloof Reserve Cluster	Third Paragraph: Second Line	Groendal Wilderness Area protects the catchments of the Swartkops and Kwa-Zunga Rivers.
52	Figure 4-8		A third of the proposed wind turbines are in a CBA1.
53	Figure 4-9		Figure 4-9 needs to be brought into the context of the project. What is its <u>relevance</u> ?
54	4.8 Socio-economic Profile	Second Paragraph: Second Line	StatsSA, 2011 is not in the References.
54	4.8 Socio-economic Profile	Second Paragraph: Last Line; Table 4-9: First Row; Last Paragraph: Third Line	Is there a difference between "economically active population" (65.8%) and "employed" (29.5%)?
54	4.8 Socio-economic Profile	Table 4-8	The Percentage Column adds up to 100.03%.
54	4.8 Socio-economic Profile	Table 4-10	Income Group: is this monthly income? The second column cannot be <u>percentage</u> .
56	5.1.2 Written notices	First Paragraph	Due to I&APs concerns regarding the proposed establishment of other wind farms in similar habitats, this Department is of the opinion that you should contact more than just "the owners and / or occupants of land immediately surrounding and within 100 m of the proposed project area". It would also be appropriate to contact AgriEastCape and Farmer's Unions in area.
56 to 57	5.1.2 Written notices		<ul style="list-style-type: none"> Were letters sent to the Department of Mineral Resources, the Provincial Department of Works and Roads, The Blue Crane Municipality, the Nelson Mandela Bay Municipality (NMBM), the Cacadu District Municipality, the Eastern Cape Heritage Resources Agency, Kouga Municipality, BirdLife Eastern Cape and other Farmer's Associations? Were letters sent to FROG (Friends of Groendal) and FOBW (Friends of the Baviaanskloof Wilderness Area)? Fourth and Sixth Bullets: This Department is the Department of Economic Development,



			<p>Environmental Affairs and Tourism. Its area of jurisdiction coincides with that of the Cacadu District Municipality.</p> <ul style="list-style-type: none"> • Is there such an institution as the Department of Environmental Health? • Uitenhage Transitional Council was incorporate into the NMBM. • Who at the Groendal <u>Wilderness Area</u> was contacted? • Who at ECPTA was contacted? • Which local tourism offices were contacted?
57	5.1.4 Site Notices		Is Site Notice 3 at the junction of the R75 and the access road to the site? It would be appropriate to indicate the GPS reading of each Site Notice at each photograph.
58	6.1 Possible Environmental Issues & Impacts	Table 6-1: Landscape & Visual: Second Row: Fourth Cell	"Design of the turbine layout <u>will</u> ... "
58	6.1 Possible Environmental Issues & Impacts	Table 6-1: Existing Infrastructure: Third Row: Fourth Cell: Second Bullet	How will the upgrading of roads and electrical connections benefit local communities in such a remote area where many of the properties are owned by one owner?
62	6.1 Possible Environmental Issues & Impacts	Table 6-1: Wetlands, Surface and Ground Water: First Bullet	Turbines should be placed a minimum of 100m from drainage lines.
65	6.2 Issues and Concerns Arising from PPP	First Row	FPA is not in the list of Abbreviations.
65	6.2 Issues and Concerns Arising from PPP	Second Row: Fourth Cell	The placement of the power lines is not in the alternatives section.
65	6.2 Issues and Concerns Arising from PPP	Third Row: Third Cell	What is the correct date?
65	6.2 Issues and Concerns Arising from PPP	Third Row: Fourth Cell	Please substantiate the opinion that developers may apply for renewable energy developments outside areas recommended by the SEA. This would defeat the objective of having a SEA. This Department supports the ECPTA's recommendation that this EIA process aligns itself with the outcomes of the SEA. The statement from the CSIR's website is merely an opinion. They do not know what will finally be gazetted.
66	6.2 Issues and Concerns Arising from PPP	First Row: Second two cells	These are two of the reasons why this Department does not support the construction of a wind farm in this area.
66	6.2 Issues and Concerns Arising	Fourth Row	It will be virtually impossible to mitigate the visual impacts of a wind farm in this area.



	from PPP		
67	2 Issues and Concerns Arising from PPP	Second Column: Third cell	The sentence "Noise impact on domestic ?" is incomplete.
67	6.2 Issues and Concerns Arising from PPP	Fourth Column: Fourth Cell	Where is "point 2 above".
67	6.2 Issues and Concerns Arising from PPP	Second Row	This Department agrees with the ECPTA's opinion on the potential impact of the proposed project.
68	6.2 Issues and Concerns Arising from PPP	Third Row	This Department is concerned what impact a development of this size would have on the catchment of the Groendal Dam
70	7.1.1 A different type of development		This is a very weak argument. A <u>convincing</u> motivation is required why a wind farm is a better land-use (ecologically and economically) than agriculture.
71	Table 7-1	First Row	Twenty four properties covering 12 000ha is a large area. <u>Disadvantages</u> : the potential ecological impact is very much understated in this report.
71	Table 7-1	Fourth Row	An advantage of a coal-fired plant is that it would produce a large quantity of electricity.
71	Table 7-1	Fifth Row	Why is the production of electricity from biomass expensive?
72	7.1.2 A different location	First Bullet: Wind speed	The fact that the main determinant for selecting this location for a wind farm is wind, supports the motivation for more information as requested in the comment on Page i.
72	Alternatives		<u>There is no discussion on proposed alternative routes for the power line to connect the wind farm to a substation as proposed in Figure 7-2.</u>
72	7.1.2 A different location	Second Bullet: Proximity to a grid connection	According to Figure 7-2 the Skilpad Substation is more than 20 km from the wind farm. This is a long distance for a power line over a visually sensitive environment. What are the criteria when deciding on the proximity of substations for power lines in South Africa?
72	7.1.2 A different location	Third Bullet: Available land	It should be appropriate, suitable land. A wind farm should not conflict with existing and future potential land-uses. This includes conservation.
72	Table 7-3	Eco-tourism	Under Eco-tourism Yes and No were chosen. No would be the appropriate choice, particularly from a visual perspective.
72	Table 7-3	Settlement	Explain why a wind farm should not occur in conjunction with a settlement when a number of authorized wind farms are close to settlements.
72	Table 7-3	Light Industry	Yes and No were chosen. Provide examples of Light Industry.
72	Table 7-3		There should be a row for Mineral Rights.
76	8. Plan of Study	8.1 EIA Phase:	A copy of reports should be made available at a

	for EIA	Second Bullet: Last Line:	venue in Port Elizabeth due to the proposed locality of the project in the proximity of a Wilderness area and other Protected Areas.
77 to 82	8.2 Specialist Studies		There is no discussion of the Visual, Socio-Economic and Hydrological / Wetland Assessments in this Section. The Socio-Economic Assessment would also have to look at the potential negative impacts on tourism. The Hydrological Assessment would also have to look at potential negative impacts on the Groendal Dam.
77	8.2.2 Ecological Impact Assessment	Second Paragraph: Last Line	Plants are also afforded protection by the Nature and Environmental Conservation Ordinance (No 19 of 1974) and the Forest Act.
85	8.3.1 Proposed structure of the EIR		It is critical that the EIR is not "excessively long and cumbersome". It should only include <u>relevant information</u> necessary to ascertain the potential environmental impacts of the proposed impacts on the environment.
89	9. References		A number of references were excluded from the list. Refer to the comments that discuss specific references that were excluded.
90	9. References		There is a new edition (2007) of Skead that should be consulted for information on mammals.
94	Appendix A5: Environmental Authorisation and Appeals Process	First Paragraph: Last Line	"The proponent is <u>obliged</u> to adhere to these conditions". Replace with must. These conditions are a legal requirement.
95	Appendix B: DEA Acknowledgement of Receipt		There is no copy of the Application Form submitted to DEA. All the requirements from DEA (their letter dated 5 th February 2013) must be met.
103	Appendix C: Public Participation	Appendix C-1: BID	There is no indication in Figure 1 (or verbal description in the text of the BID) that the proposed wind farm is close to a Wilderness Area, other Protected Areas, in areas being considered for the expansion of these Protected Areas and in the Catchment of the Groendal Dam. This is important information that should have been provided to the I&APs.
108	Appendix C: Public Participation	Appendix C-3: Letter of notification to occupiers of land	More information should have been provided. Refer to previous comment.
110 to 111	Appendix C: Public Participation	Appendix C-4: Proof of Notification: Organs of State	This Department's e-mail address is not here. The South African Wilderness Foundation, BirdLife South Africa and the Landmark Foundation are not Organs of State. Were letters of notification sent to all the institutions mentioned in Section 5.1.2 (Page 56)? If they were not e-mailed how were they sent?



112	Appendix C: Public Participation	Appendix C-4: Proof of Notification: Neighbours	Are these people / institutions all neighbours?
Pages 113 and 114	Appendix C: Public Participation	Appendix C-5: Advertisements	The advertisements in the Burger and Herald are illegible.
116	Appendix C: Public Participation	Appendix C-6: Map indicating the position of the three site notices.	Refer to comments on other maps. The Site Notice Points should be numbered to correspond with the photographs of each site. GPS readings of the Points should be given on the map and at each photograph.
119 to 120	Appendix C: Public Participation	Appendix C-7: I&AP Register	<ul style="list-style-type: none"> • Was information sent to Groendal Wilderness Area? It is an authority and a neighbour. • RSA Gov (Mierhoop Plaat) is part of Groendal Wilderness Area. • This Department is Economic Development, Environmental Affairs and Tourism. • DMR has been omitted from Authorities. • Wayne Erlank, Sello Mkhanya, Brian Reeves, Patric Zake, Sizwe Mkhulise, Asanda Sontsele, Peter Bradshaw, John Adendorff and Lennox Zote are associated with Authorities. • Tiffany Thwait's is a post graduate student at NMMU. • Prof Graham Kerley is employed by NMMU. He is no longer the chairperson of ECPTA. • Dr Paul Martin is a private environmental consultant. • In general this Register needs to be sorted out to ensure accuracy.



DAYALAN GOVENDER
REGIONAL MANAGER: ENVIRONMENTAL AFFAIRS: CACADU REGION

DATE: 3/12/2013



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