

BIODIVERSITY COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORTS FOR THE PROPOSED VELD PV SOUTH (DEA Reference: 14/12/16/3/3/1/2103) AND NORTH (DEA Reference: 14/12/16/3/3/1/2102) SOLAR ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE NEAR AGGENEYS IN THE NORTHERN CAPE

Herewith the responses to the comments from Biodiversity dated 28 January 2020 and 30 January 2020 respectively. [Please refer to the CRR for previous comments and responses by Aurecon during the pre-application phase (PPP)].

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the specialist report, the vegetation found in the study area is classified as very low sensitive and no species of conservation concern observed on site.

Noted.

Notwithstanding the above, the following recommendation must be considered in the final report:

- According to the Botanical Impact Assessment report the proposed study area is situated within an area which is classified as marginally Critical Biodiversity Area (CBA) and mostly CBA2; therefore, development footprint must be restricted to the low sensitive or disturbed area;

Response from the appointed independent Botanical Specialist:

In both reports it was noted that parts of the areas selected would fall within CBA1 and CBA2 areas. However, it was stated in the reports as follows:

Veld PV North:

“From field observations it has been determined that the Veld PV North ‘NEW’ focus area has none of these attributes. The rationale for assigning this area to CBA1 and CBA2 is not clear and no documentation is currently available that explains this designation. It is my contention, based on observations, that the Veld PV North ‘NEW’ focus area should be assigned Ecological Support Area (ESA) status which still points to its ecological value but does not assign a ‘critical’ status to the area.”

Veld PV South:

The map designates the Veld PV South ‘focus area’ as falling within a Critical Biodiversity Area 2 (CBA2 – Figure 21). The definition and parameters of CBA2 according to Desmet & Marsh (2008) are given in Appendix 1. CBA2 includes important areas that have endangered vegetation types, important habitat types and threatened species. The Veld PV South ‘focus area’ has none of these attributes except for Hoodia gordonii and marginally Boscia albitrunca. The rationale for assigning this area to CBA2 is not clear and no documentation is currently

	<p>available that explains this designation. Based on field observations I believe that the Veld PV South area should be assigned Ecological Support Area (ESA) status which still points to its ecological value but does not assign a 'critical' status to the area.</p>
<ul style="list-style-type: none"> The report states that no alien invasive plants species were observed on site but care must be taken during construction not to introduce the invasive plant species on site; 	<ul style="list-style-type: none"> Alien invasive plants were indeed considered, and no such species were found in the footprint of the proposed solar PV development. <i>Prosopis</i> spp. are a problem and could be introduced to the site by disturbance but precautions would be taken to prohibit or at least limit this eventuality. The dense stand on the farm is well away from the development site and would not influence it in any way. No Alien Invader Management Plan has been compiled at this stage because the selected sites are free of alien invasive plants.
<ul style="list-style-type: none"> Species listed in terms of TOPs and Red Data List (if there is any on site) must not be disturbed or removed without a permit from the relevant authorities; 	<ul style="list-style-type: none"> The sensitive species were mapped, and their locations recorded. Apart from <i>Hoodia gordonii</i> and relocation of the few plants present, it is unlikely that any <i>Boscia albitrunca</i> trees would be affected so no permits have been applied for. Such permits would only be applied for in the event of it being necessary. All the necessary permits will be applied for as appropriate and applicable to the development sites. And application(s) in this regard will be submitted to DENC.
<ul style="list-style-type: none"> Anti-collision devices such as bird flappers must be installed where powerlines cross avifaunal corridors. 	<ul style="list-style-type: none"> Anti-collision devices such as bird flappers must be installed on all high-risk sections of the powerline to forewarn birds of the risk – Refer to Section 4.3 of the project EMPR and Section 5.11 of the DEA Generic EMP for Powerlines
<p>The proposed development might pose a serious threat such as entrapment, displacement, collision risk, electrocution etc. of the Important Bird Area (IBA) trigger species, therefore the final report to be submitted for authorisation must comply with all requirements as outlined in the Best Practice Guideline for</p>	<ul style="list-style-type: none"> A site-specific avifaunal walkthrough must be conducted by an Ornithologist prior to construction, so as to ensure that no sensitive bird species have started breeding on or near site - Refer to Section 4.3 of the project EMPR and

<p>Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa in order to avoid or reduce the impacts that might occur as a result of the proposed development.</p>	<p>Part C Section 8 of the DEA Generic EMP for Powerlines.</p>
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