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Reference **SSD14/2/6/1/8/4_Ind_183 Waschklip, 190 Evertshope**
Date 12 April 2021

Ecoleges Environmental Consultants
PO Box 516, Machadodorp,
1170

Via email: hlengile@ecoleges.co.za / justin@ecoleges.co.za

Attention: Ms Hlengile Mtsweni

Dear Ms Mtsweni

AMENDMENT APPLICATION MOTIVATION REPORTS - PART 2 AMENDMENT APPLICATION TO THE ENVIRONMENTAL AUTHORISATIONS FOR THE DEVELOPMENT OF THE 100MW COMMERCIAL SOLAR ELECTRICITY GENERATION FACILITIES AND INFRASTRUCTURE, ON FARM WASCHKLIP 183, (SOVENTIX SA SALDANHA 1(SS1)) AND FARM EVERTS HOPE 190, (SOVENTIX SA SALDANHA 2 (SS2)), NEAR LANGEBAAN, WITHIN THE SALDANHA BAY DISTRICT MUNICIPALITY IN THE WESTERN CAPE PROVINCE.

DFFE Ref: 12/12/20/2126 & 12/12/20/2126/1

CapeNature would like to thank you for the opportunity to comment on this application. Our comments are as follows.

1. Given that the proposed development will affect CBA and ESA areas within the development footprint, it is advised that a terrestrial ecology assessment on flora, fauna and vegetation be undertaken to determine the impact of the development on these sensitive areas. This should include the identification of any species of conservation concern and provide appropriate avoidance and mitigation measures based on the findings of the assessment. It is noted as per page 30 of the report, "assumptions and limitations", that specialists that conducted assessments during the baseline EIA have declared that no further assessment is necessary. However, given that the initial EIA was conducted more than eight years ago, it is advisable to conduct a further terrestrial ecology assessment of the site as the ecological state of the site could have changed in this time especially regarding species of conservation concern. If electricity generated is to be evacuated from the facility via powerlines, then it is advised that an avian impact assessment be conducted.
2. Note that the vegetation threat status of Saldanha Flats Strandveld has changed from vulnerable to endangered since the initial EIA was conducted as per the Vegetation Map of South Africa, Lesotho and Swaziland (2018 version). This would need to be considered in further environmental assessment of the site.
3. The Western Cape Provincial Biodiversity Spatial Plan 2017, should inform the impact ratings.

4. It is noted that the development footprint does not appear to be in the Besaansklip Industrial Area.
5. A cumulative impact assessment for the development should be done, as development within the Saldanha area has increased since the initial baseline EIA was conducted.
6. Give an indication on a map of the extent of the development footprint that has been approved and for which there is a valid EA, and the proposed extent of the expansion of the development footprint.
7. Ensure that relevant informants such as *Ecosystem Guidelines for Environmental Assessment in the Western Cape* (De Villiers *et. al.*, 2016), are considered when formulating the EMPr.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

References:

De Villiers C., Holmes P., Rebelo T., Helme N., Brown D., Clark B., Milton S., Dean W.R., Brownlie S., Snaddon K., Day L., Ollis D., Job N., Dorse C., Wood J., Harrison J., Palmer G., Cadman M., Maree K., Manuel J., Holness S., Ralston S., Driver A., (2016). *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd edn. Edited by Mandy Cadman. Cape Town: Fynbos Forum.

Yours sincerely,



Ismat Adams
Conservation Officer Off-Reserve: Ceder-Berg Landscape Unit

For:

Marius Wheeler
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Elbé Cloete
Landscape Manager: Landscape West

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