Environmental Impact Assessment for the proposed Ubuntu Wind Energy Project near Jeffrey's Bay, Eastern Cape: Final Environmental Impact Assessment Report

APPENDIX F:

Correspondence to Interested and Affected Parties following the release of the Draft Environmental Impact Assessment Report

Copy of Letter 4 to I&APs

PO Box 27688 Greenacres 6057
120 Diaz Road Adcockvale, PE 6001
Phone 041 374 8426 Fax 041 373 2002
Email sandy@publicprocess.co.za
Ck 97/32984/23 VAT 44601 68273

Public Process Consultants
Environmental Impact Assessment and Public Participation Management

18 August 2011

«Title» «First_Name» «Last_Name»
«Organisation»
«Address_1_»
«Address_2»
«Town»
«Code»

Dear «Title» «Last_Name»

RE: Notice of Comment Period and Public Meeting, Draft Environmental Impact Assessment and EMP for the Proposed Ubuntu Wind Energy Project, Farm Zuurbron and Vlakteplaas, Kouga Municipality (*DEA Ref no: 12/12/20/1752*)

As a registered interested and affected party on the database for the above project you are hereby notified of the release of the Draft Environmental Impact Assessment Report (DEIA) and Environmental Management Plan (EMP) for a 40 day comment period from the 18 August 2011 to the 26 September 2011 (DEA reference no: *12/12/20/1752*). All comments on the Draft EIA and EMP are to be submitted to the Public Participation Consultant, contact details above, by no later than the **26 September 2011**.

Report Availability

Copies of the Draft EIA and EMP are available for viewing at the **Jeffrey's Bay** as well as **Humansdorp Main Libraries** and can be downloaded through the website, **www.publicprocess.co.za**

Public Meeting

To assist you in the review of the Draft EIA and EMP all interested and affected parties are invited to attend a Public Meeting, details below, where an overview of the Draft EIA and EMP will be given and an opportunity will be provided for comments to be made in response to the Draft Reports. Representatives from the CSIR, the Environmental Consultants for the Project, as well as WKN Windcurrent, the Project Applicant, will be present at the meeting to engage with members of the public.

DATE	TIME	VENUE
Friday 23 September 2011	12 noon	Newton Hall, Jeffreys Bay (Goedehoop and St Francis Street)

To assist you with the submission of your comments we have included with this correspondence an Executive Summary of the Draft EIA Report as well as a comment form.

Should you have any comments or queries please do not hesitate to contact Sandy Wren, Paul Steyn or Wandile Junundu at the contact details above. We look forward to your participation in this stage of the process.

Yours sincerely

SANDY WREN

Copy of Comment Form for the Draft EIA

DRAFT EIA AND EMPR COMMENT FORM

SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS
UBUNTU WIND ENERGY PROJECT *DEA Ref no: 12/12/20/1752*

WKN-Windcurrent SA (Pty) Ltd, the project applicant, is proposing to construct a wind energy facility, with a maximum generation capacity of 100 MW, on the Farms Zuurbron and Vlakteplaas in the Kouga Municipal area, Eastern Cape Province

Listed Activities: **GN R387 Activity 1. (a) (i), (ii) and (l); and 10. and in GN R386 Activity 15.**

Return Completed Reply Form to:

Public Process Consultants, PO Box 27688, Greenacres 6057

Phone: 041 – 374 8426 or Fax 041-373 2002 or Email sandy@publicprocess.co.za

Please Complete all Relevant Sections Below and Return By:

26 September 2011

Please provide your full contact details:

FIRST NAME:	*SURNAME:*
ORGANISATION:	*DESIGNATION:*
POSTAL ADDRESS:	
CODE:	
PHONE:	*FAX:*
CELL:	*EMAIL:*
Email:	

Please detail any comments that you have in response to the Draft EIA and EMP (use additional pages if required)

Comment form for Draft EIA and EMPr

Executive Summary for the Draft EIA

1. IMPACT ASSESSMENT AND MITIGATION

The key issues identified during the scoping process, and assessed during the EIA, were investigated and specialist studies conducted. The overall impacts (after mitigation) are summarised below:

- Impacts on terrestrial fauna and flora: **Low** (negative);
- Impacts on birds: **Low to Medium** (negative); (low for collision mortality and medium for displacement of birds);
- Impacts on bats: **Low** (negative), (confidence levels are medium as it is based on 2 months monitoring data);
- Visual impacts: **High** (negative);
- Noise impacts: **Low** (negative);
- Economic impact: **Low** (negative), **Medium** (positive) for project investment/ expenditure;
- Impacts on archaeology: **low** (negative); and
- Impacts on palaeontology: **low** (negative)

The main findings of these studies are outlined below, together with proposed mitigation and recommendations:

FLORA

Sixteen terrestrial vegetation impacts that may occur during the construction and operational phases of the proposed project have been identified, which can be divided into three key types of impacts, namely:

- Loss of vegetation habitat;
- Reduction or changes to ecological processes and functioning. This include temporary fragmentation of habitats, increased risk of alien invasion in drainage lines and disturbed areas, changes in natural fire regime and overall reduction of ecosystem functioning; and
- Loss of species of special concern (SSC) and SSC habitat.

Mitigation

- Protected flora or species of special concern must be removed from the development footprint to be safeguarded from destruction and relocated either to undeveloped areas or off-site in consultation with conservation authorities and relevant botanical specialists;
- Permission must be obtained from the provincial authorities to destroy or remove any protected plant species as per legislation;
- A long term alien plant management plan to control these invasive species must be implemented within the designated Open Space areas;
- Appropriate measures must be implemented where infrastructure crosses drainage lines or seeps and no turbine footprints or lay down areas will be sited within recommended wetland and riparian buffers; and

- Kikuyu grass must not be utilised during re-grassing of verges, turbine footprints and other landscaped areas within the site, particularly adjacent to riparian habitat.

Overall the impacts on terrestrial flora are estimated to be **negative** and of **low** significance (after mitigation).

FAUNA

Five key faunal impacts have been identified and assessed, namely:

- Habitat destruction of habitat;
- Road mortalities;
- Increased poaching risk;
- Fauna harmed by fences; and
- Corridor disruptions as a result of habitat fragmentation.

The impact on the terrestrial fauna will largely be temporary and is expected to return to its normal state after construction, other than road mortalities, the risk of which are likely to persist.

Mitigation

- Removal of animals from the affected areas before the start of site clearing and construction, and relocating these to safe areas would only be a valid mitigation option in the case of tortoises, so far as reasonable possible. All other reptile and small mammal species are extremely difficult to catch and it would be futile to attempt to relocate them. Before site clearing, affected areas should be thoroughly searched for tortoises. Tortoises found must be released in adjacent unaffected areas.
- A speed limit of 60 km/h needs to be implemented on the access roads to the site and a 40 km/h speed limit on the construction sites and for the cranes.
- Appropriate speed control measures must be implemented to keep vehicular traffic speeds to within recommended limits.
- Road design must be such that it allows free movement of fauna.
- All staff active on site must be instructed and briefed regarding the strict faunal management requirements before construction commences.
- Any fencing must be kept to minimum and recommended measures implemented to minimise risk of impacts to fauna.

All terrestrial floral and faunal impacts have been assessed and it is estimated that these can be mitigated from **moderate to low** impact through implementation of the recommended mitigation measures during the operational and construction phases of the proposed wind farm development.

IMPACT ON BIRDS

The main potential impacts of the project on birds are collisions with the project infrastructure, potential displacement of priority bird species and habitat loss as a result of the project. These are discussed below.

WKN-Windcurrent has commissioned a pre-construction bird monitoring programme on site since January 2011. Subsequently the "*Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa*" (Jenkins *et al*. 2011) by the Endangered Wildlife Trust (EWT) and BirdLife South Africa (BLSA) was released in the public domain on 31 March 2011. The monitoring protocol used in this study was designed before the publication of the guideline document but was subsequently, after the publication of the guidelines, adapted to conform more to the published guidelines.

Collision mortality on wind turbines

The following preliminary conclusions can be drawn from the pre-construction monitoring done to date as far as potential collision of priority species with wind turbines are concerned, subject to further monitoring:

- Soaring species e.g. African Fish-Eagle, African Harrier-Hawk, African Marsh-Harrier, and Jackal Buzzard are most at risk of collisions, with the exception of Secretarybirds, which seem to fly very seldom.
- Black Harriers spend most of their flying time below rotor height, which is typical of their foraging behaviour. Southern Pale Chanting Goshawks generally fly below rotor height, which is also typical foraging behaviour.
- No clear pattern emerged for large terrestrial species. Blue Crane and Denham's Bustard flew during light and strong wind conditions, with no flights recorded in calm and moderate wind conditions. White-bellied Korhaan flew in all wind conditions, with most flights in strong wind conditions.
- Terrestrial species i.e. Blue Cranes, White-bellied Korhaan and Denham's Bustard, based purely on the number of medium altitude flights recorded, may also be at risk, but in the case of Denham's Bustard, the risk could be reduced due to the potential of displacement when the wind farm is operational.
- Collision risk is higher in summer than in winter, when passage rates are higher, largely because of an influx of migrants.
- Flight patterns of priority species at medium altitude recorded to date do not indicate any distinct flight corridors which will necessitate the relocation of any of the proposed turbine locations. This is subject to further monitoring being conducted.
- Most flights take place during light and moderate wind conditions.
- Most flights take place during north-westerly winds.
- The overall collision risk estimates per turbine per year for priority species (summer and winter data only) as a group is low.

Potential displacement of priority bird species

The following preliminary conclusions can be drawn from the pre-construction monitoring done to date:

- The survey area is particularly well suited for Denham's Bustard and White-bellied Korhaan.
- Grassland is the most important priority species habitat – it comprises 50% of the habitat in the survey area, but it contained almost 93% and 74% of birds recorded in summer and winter respectively.
- For reasons not quite clear at this stage, Blue Cranes were recorded more regularly in summer than in winter.

At this stage, it can only be speculated about the impact of potential displacement on large terrestrial birds in the study area, particularly Denham's Bustard, White-bellied Korhaan, Blue Crane and Secretary bird as this will only become apparent once the post-construction monitoring

commences. If the birds are displaced, this could potentially be the most significant impact of the wind farm on the avifauna.

In addition to transect surveys and point counts, focal point monitoring of suspected nest sites of priority species was also undertaken. In the course of the monitoring, a suspected Secretary bird nest was located (33^0 55' 35.33" S; 24^0 52' 29.70" E), which is about 340 m from the nearest proposed turbine.

Habitat Loss

The scale of direct habitat loss resulting from the construction of a wind farm and associated infrastructure depends on the size of the project but, generally speaking, is likely to be small per turbine base. Typically, actual habitat loss amounts to 2–5% of the total development area. Direct habitat loss is not regarded as a major impact on avifauna compared to the potential impact of collisions with the turbines and, in particular, potential displacement due to disturbance. The infrastructure footprint must be restricted to the minimum, in accordance with the recommendations of the ecological specialist study.

Assessment rating

As far as collision mortality is concerned, it is predicted that the project will have a negative impact of Low significance (with mitigation). This will have to be verified by post-construction monitoring. It can be stated with confidence that wind farms generally have a lower collision mortality impact than power lines, which has proven to be a major cause of significant unnatural mortality. Birds generally have a high avoidance rate for wind turbines.

As far as displacement of birds is concerned, no firm conclusions can be drawn without actual post construction monitoring. Priority species likely to be affected include Blue Cranes, Secretary birds and Korhaans. It is predicted that the project will have a **negative** impact of **Low to Medium** significance (with mitigation), depending on whether habituation takes place, or off-set compensation is implemented.

Mitigation

- Post-construction monitoring should be implemented to assess the impact of displacement, particularly on priority species. Initially, a 12-month period of post-construction monitoring should be implemented, using the same protocol as is currently implemented. Thereafter, the need for further monitoring will be informed by the results of the initial 12-month period;
- The breeding activity of the pair of Secretarybirds at the site must be carefully monitored. If the birds actually commence with breeding at the nest site, their nesting activity must continue to be monitored throughout 2011. In the unlikely case of them re-using the nest in 2012, appropriate mitigation must be agreed upon between the avian specialist and the project proponent to ensure that the birds are not disturbed during the critical nesting period of August to October.
- Should the results of the post-construction monitoring indicate significant displacement of priority species, appropriate offset compensation should be negotiated with developer to compensate for the loss of priority species habitat. Another mitigation measure is to halt operation during peak flight periods, or reducing rotor speed to reduce the risk of mortality.
- During the construction period, activity should be restricted to the construction footprint itself. Access to the rest of the properties must be strictly controlled to prevent unnecessary disturbance of birds.

This report should be seen as work in progress since full results of the pre-construction monitoring programme will only become available later in 2011, when the spring monitoring has been completed. The final results of the current baseline monitoring will then be available to feed into the final lay-out of the turbines.

IMPACT ON BATS

Bats play important functional roles as insect predators, pollinators and seed dispersers. They are sensitive to changes in mortality rates and their populations tend to recover slowly from declines. Bats can be classified into three broad functional groups on the basis of their wing morphology and echolocation call structure. Of these groups, open-air foragers, bats that have a wing design and echolocation call adapted to flying fast, high above the vegetation, are mostly at risk from wind turbine developments.

The Ubuntu Wind Energy Project falls within the distributional ranges of 13 species that have been recorded in the area. Open-air foragers, who could forage up to 500 m above ground, are most likely to be negatively impacted upon by the turning turbine blades, because the blades will be within the range of their foraging altitude. Species that migrate over the proposed development site will be further at risk, regardless of their foraging behaviour.

The most important aspect of the project that would affect bats adversely are the wind turbines themselves, and in particular, the operational turning blades. The main direct impacts related to the proposed development are:

- Loss of foraging habitat;
- Direct collisions with the rotating turbine blades; and
- Fatalities from barotraumas (i.e. effect of a change in air pressure caused by the rotation of the wind turbine blades on the internal organs of the bats, such as lungs).

There is furthermore a cumulative impact related to the density of wind farms in the Jeffrey's Bay/Humansdorp vicinity.

The site was visited during January and May 2011. Except for a few buildings, which at the time of the site visits had no indication of bat roosts, the proposed site does not contain habitat that is attractive to bats. It must be noted though that areas bordering the proposed development have habitat that is attractive to bats, such as open water bodies and the overhanging cliffs of the Kabeljous valley.

WKN-Windcurrent has commenced with a bat monitoring programme on site from 19 May 2011. The monitoring is informed by "*The South African Good Practice Guidelines for Surveying Bats in Wind Farm Development* (Sowler and Stoffberg, 2011)". During May three Anabat bat detecting recorders were installed on site. The monitoring data for May and June have been included in the bat specialist report included as Chapter 7 of the DEIA. Limited numbers of *Neoromicia capensis*, *Miniopterus natalensi* (Near Threatened), *Myotis tricolor* (Near-threatened in SA), *Taphozous mauritianus*, *Tadarida aegyptiaca* were recorded on site. Of these species, *Tadarida aegyptiaca* and *Taphozous mauritianus* are open air foragers. It is therefore expected that they will be negatively impacted upon by the wind turbine development.

The current turbine layouts have been informed by recommendations from the bat specialist working on this project. Therefore buffer zones have been incorporated in the layout to exclude areas that might have bat activity, such as open water bodies and derelict buildings.

If data collected up to now is taken into account, the impact of the wind turbines on bats at the Ubuntu Wind Energy Project is predicted to be **negative** and of **low** significance with mitigation. Confidence levels are medium, as only two months of monitoring data have been incorporated, but the report will be updated with additional information from the forthcoming monitoring results.

Mitigation

- Bat monitoring to continue and include spring and Summer, as well as more extensive Autumn monitoring;
- Post-construction monitoring should be implemented;
- If further monitoring data confirms low bat activity, the main mitigation proposed is to completely seal off roofs of new buildings within the study area, and those of existing buildings that do not have any bats roosting in them at present within the study area, so as to prevent bats from moving in, thus making them more prone to coming into contact with the turbines in the surrounding area;
- If a high number of bats are recorded during the following ten months monitoring, bat roost sites could be established (e.g. roost boxes) as a trade-off to offset potential mortalities during turbine operation; and
- If future monitoring data shows high activity, the client together with a bat specialist should investigate further mitigation measures. This includes an increase in buffer zone distance, depending on the foraging habitat of species that will be impacted upon, and refining operational procedures of the turbines, such as to increase turbine cut-in speed. (i.e. minimum wind speed at which blades start rotating, currently 4 m/s).

VISUAL IMPACT

Visual or aesthetic impacts will occur during the construction, operational and decommissioning phases of the proposed project. The main visual impacts of the proposed Ubuntu Wind Energy Project are:

- Visual impact on the landscape;
- Visual impact on viewers;
- Intrusion of large highly visible wind turbines on the existing views of sensitive visual receptors; and
- Visual impact of night lights of a wind farm on existing nightscape.

The wind farm will be located within a mixed landscape containing agricultural and coastal resort elements. Agricultural landscapes have a low sensitivity to changes brought by wind farms, and the coastal resort landscapes in Kouga are rapidly changing as towns expand and merge.

The wind farm will be built on a highly visible plateau above the N2, and it will potentially be visible over a large region. Viewers who will be most affected by the wind farm are those living on farms surrounding the development site, especially for viewpoints west and south of the site where existing views contain relatively few man-made structures and a sense of remoteness

prevails. However, there are not many sensitive viewers in these areas who will be highly exposed to the wind farm. Views from Jeffrey's Bay are unlikely to be affected severely since scenic views are normally directed at the mountains to the north or towards the sea. Protected areas in the region are generally too far from the site to be highly impacted.

Assessment rating:

The significance of the impact on the landscape character of the region is **moderate** since the impact duration is long and its extent regional, but the intensity is expected to be low.

The significance of the visual impact on sensitive viewers during the construction phase of the wind farm is **high** due to the number of sensitive viewers who will be affected. Not all of the construction phase will necessarily have a negative visual impact since the construction of wind turbines is an incredible engineering feat and viewers are likely to find it fascinating to observe.

The overall significance of the visual impact on sensitive viewers during the operational phase of the wind farm is **high** due to the regional extent, long term and severe effect of the impact. The intensity of the impact is expected to be high for a number of highly sensitive viewers (residents) who will potentially be highly exposed to the wind farm, and since there are no structures of similar size in their existing views the visual intrusion will be high.

The significance of the impact of lighting of the turbines according to aviation regulations is expected to be **moderate** for residents living in close proximity, but **low** overall since it is unlikely to contribute to light pollution and there is an existing sky-glow produced by settlements and other developments in the region which will often be a backdrop to views of the lights.

Mitigation

- Dust suppression is important as dust will raise the visibility of the development.
- New road construction should be minimised and existing roads should be used where possible.
- The contractor should maintain good housekeeping on site to avoid litter and minimise waste.
- Clearance of indigenous vegetation should be minimised and rehabilitation of cleared areas should start as soon as possible.
- Erosion risks should be assessed and minimised as erosion scarring can create areas of strong visual contrast with the surrounding vegetation, which can often be seen from long distances since they will be exposed against the hillslopes.
- Laydown areas and stockyards should be located in low visibility areas (e.g. valleys between ridges) and existing vegetation should be used to screen them from views where possible.
- Night lighting of the construction sites should be minimised within requirements of safety and efficiency.
- Ensure that there are no wind turbines closer than 500 m to a residence.
- Maintenance of the turbines is important. A spinning rotor is perceived as being useful. If a rotor is stationary when the wind is blowing it is seen as not fulfilling its purpose and a negative impression is created (Gipe 1995).
- Signs near wind turbines should be avoided unless they serve to inform the public about wind turbines and their function. Advertising billboards should be avoided.
- According to the Aviation Act, 1962, Thirteenth Amendment of the Civil Aviation Regulations, 1997: "Wind turbines shall be painted bright white to provide maximum daytime conspicuousness. The colours grey, blue and darker shades of white should be avoided

altogether. If such colours have been used, the wind turbines shall be supplemented with daytime lighting, as required."

- Lighting should be designed to minimise light pollution without compromising safety. Investigate using motion sensitive lights for security lighting. Turbines are to be lit according to Civil Aviation regulations.
- An information centre (provided that it is located in a low visibility area) and trails along the wind farm can enhance the project by educating the public about the need and benefits of wind power. 'Engaging school groups can also assist the wind farm proponent, as energy education is paramount in developing good public relations over the long term. Instilling the concept of sustainability, and creating awareness of the need for wind farm developments, is an important process that can engage the entire community' (Johnston 2001). This has also been borne out by a more recent study on the effect of wind farms on tourism in which respondents said they would visit wind farms as long as there was an information centre (Frantál & Kunc 2010).
- The aviation standards have to be followed and no mitigation measures are applicable in terms of marking the turbines. Lighting of ancillary buildings and structures should be designed to minimise light pollution without compromising safety. Motion sensitive lighting can be used for security purposes.

NOISE IMPACT

The noise impact during the construction period will be localised around the turbine sites, as well as noise from construction vehicles accessing the sites. There will be a short term increase in noise in the vicinity of the site during the construction phase as the ambient noise level will be exceeded. The impact during the construction phase will be difficult to mitigate. The significance of the construction noise impact is predicted to be **low** (without mitigation).

Noise impacts were modelled for the operational phase, taking into consideration noise sensitive areas (i.e. receptors of noise impacts, such as offices or houses). The noise modelling (using WindPro Software) is precautionary, and does not take into account the masking effect that ambient wind noise will have on the turbine noise. Ambient noise increases as the wind speed increases. Under very stable atmospheric conditions (e.g. temperature inversion or a light wind), the turbines will in all likelihood not be operational as the cut-in speed is 4 m/s. As the wind speed increases above the cut-in speed, the ambient noise will also increase. If the atmospheric conditions are such that the wind is very light (<4 m/s) at ground level but exceeds the cut-in speed at hub height, it is feasible that little ambient noise masking will occur. The critical wind speeds are thus between 4-6 m/s when there is a possibility of little masking. Above 8 m/s the wind noise starts masking the turbine noise. The noise modelling indicates that, in general, noise from the turbines will be below the SANS10103 limits for rural areas at a distance of approximately 500 m from the turbines.

Provided that the mitigation measures presented below are implemented effectively the overall noise impact (with mitigation) is expected to be **negative** and of **Low** significance.

Mitigation

- All construction operations should only occur during daylight hours if possible.
- No construction piling should occur at night. Piling should only occur during the hottest part of the day to take advantage of unstable atmospheric conditions.

- Ensuring that construction staff is given "noise sensitivity" training.
- Ambient noise monitoring is recommended at three NSA's per year over a three year period.

ECONOMIC IMPACTS

The main impacts identified during the construction and operational phases of the project include the following:

- Impacts on land owners within the site boundaries;
- Impact on surrounding land uses;
- Impacts on tourism; and
- Impacts on commercial activity associated with expenditure linked to the construction and operation of the development.

It is highly likely that the impacts on land owners within the site boundaries would be net positive. The project would provide a welcome source of additional income while allowing existing farming activities to continue and introducing relatively minimal risks and potential negative impacts with adequate mitigation. No significant negative impacts on the agricultural activities on surrounding farms are anticipated for the same reason mentioned above.

Assessing the overall risk to tourism (i.e. considering negatives and positives) needs to be recognised as an exercise with high levels of uncertainty. Nevertheless, considered as a whole, a low to medium level of risk for tourism with mitigation is anticipated.

The project has the potential to have a highly significantly positive impact on economic activity in the local area and sub-region given the size of the new spending injection associated with it and the need for economic opportunities. Preliminary estimates indicate that a total of approximately R1.6 billion would be spent on the entire construction phase. Approximately 187 jobs of one year duration would be associated with the entire construction phase with the majority of jobs in the low and medium skill sectors as expected. It is anticipated that approximately 82 of these jobs would be allocated to workers from the Kouga Municipal area and a further 72 to workers from the rest of the Eastern Cape. Direct incomes flowing to construction workers from the Kouga Municipality area would amount to R9.7 million over the course of the project while R11.7 million would accrue to workers from the rest of the Eastern Cape. With regard to direct employment during operations, it is expected that approximately 10 direct employment opportunities would be created by the project equally spread across skill levels. Although initially high skill positions probably will have to be filled by foreign technicians (with a view to filling positions with locals over time), medium and low skill positions will offer immediate opportunities for locals and those from the region.

The overall impact on economy (with mitigation) is expected to be **negative** and of **low** significance. The impacts associated with project investment/expenditure is expected to be **positive** and of **medium** significance given the significance of the injection relative to economy.

Mitigation

- Implement recommendations of noise, visual, ecological, bird and bat specialist studies;
- Adequate setbacks from buildings, structures and residences to be strictly enforced;
- Set targets for use of local labour and maximise opportunities for training;

- Use local sub-contractors where possible; and
- Explore ways to enhance local community benefits with a focus on broad-based BEE through mechanisms such as community shareholding schemes and trusts.

IMPACT ON ARCHAEOLOGY

Only a few weathered quartzite Middle Stone Age stone tools were observed where the pebble/cobble gravels were exposed by ploughing. These stone tools date between 30 000 and 250 000 years old. They were mainly thick, small 'informal' flakes and chunks manufactured from quartzite. All stone tools were in secondary context and not associated with any other remains. Although none was found, one would also expected to find occasional Earlier Stone Age stone tools (1,5 million – 250 000 years old) in the gravels as well.

The nearest important cultural sites to the proposed development are the Kabeljous Rock Shelters (2,5 kilometres south of the closest turbine), a large number of sites along the coastline (7 kilometres south of the closest turbine) and Sara Baartman's grave site at Hankey (8 kilometres north of the closest turbine). The turbines will have little or no visual impact on the Kabeljous Rock Shelters because the shelters face south and are situated in the kabeljous River valley along the eastern embankment. The turbines will be visible from the coastal sites and possibly also from Sara Baartman's grave.

The area investigated appears to be of low archaeological sensitivity and the impact of construction will be insignificant. The isolated distribution of the finds, their very low numbers, and the fact that all of the occurrences occur in a disturbed context (ploughed fields) mean that the archaeological remains located during the study are in secondary context and are rated as having **low** significance. It is also highly unlikely that any archaeological heritage remains of any value will be found in situ or of any contextual value. The impact of the development on archaeological sites/materials will be limited. The area is also situated more than five kilometres from the coast which is further than the maximum distance shell middens are expected to be found inland. No such features were observed.

Mitigation

- In the unlikely event that any concentrations of archaeological material are uncovered during further development of the site, it should be reported to the Albany Museum and/or the South African Heritage Resources Agency immediately so that systematic and professional investigation/excavations can be undertaken. Sufficient time should be allowed to remove/collect such material.
- The visual effect of the development on important cultural sites in the wider area, such as Sara Baartman's grave and archaeological sites along the nearby coast must be included in the visual investigation for community/public consultation. The development will have little or no effect on the Kabeljous River Rock Shelters due to their location in the Kabeljous River valley.
- Construction managers/foremen should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites. It is suggested that a person be trained to be on site to report to the site manager if sites are found.

IMPACT ON PALAEONTOLOGY

The study area is largely underlain by fluvial conglomerates and minor sandstones of the Mesozoic Enon Formation (Uitenhage Group) that are locally mantled with a veneer of pebbly relictual soils of the so-called Bluewater Bay Formation (Algoa Group). Both of these rock units are very sparsely fossiliferous, so any proposed development on the coastal plateau here is likely to have very little impact on the local palaeontological heritage.

On the other hand, beds of sandy marls reported towards the base of the Enon succession near the Kabeljourivier may prove fossil-rich (e.g. plant compressions) and are therefore of palaeontological interest. Marine sediments – mainly dark mudrocks - of the Devonian Bokkeveld Group underlying the Kabeljousrivier valley on the western margin of the study area have yielded invertebrate fossils (notably various brachiopods) in the past, although most fossils in these rocks have probably been destroyed by tectonic deformation or weathering since the break-up of Gondwana in Cretaceous times.

The operational and decommissioning phases of the Ubuntu Wind Energy Project are unlikely to have any significant impacts on local fossil heritage. The overall impact on palaeontology (with mitigation) is therefore expected to be **negative** and of **Low** significance.

Mitigation

- Any substantial fresh excavations into lower Enon or Bokkeveld Group rocks in the Kabeljousrivier Valley area should be recorded, sampled and monitored by a qualified palaeontologist during the construction phase of this development, at the expense of the project proponent. An appropriate schedule and *modus operandi* for monitoring should be negotiated by the palaeontologist with the proponent before construction starts.
- Should substantial fossil remains be exposed at any stage during development, these should be safeguarded - *in situ*, if feasible – and recorded by the responsible Environmental Control Officer (photos, GPS readings). SAHRA should be alerted as soon as possible so that appropriate mitigation measures may be considered.

2. OVERALL EVALUATION OF IMPACTS BY ENVIRONMENTAL ASSESSMENT PRACTITIONER

No negative impacts have been identified that, in the opinion of the Environmental Assessment Practitioner, should be considered "fatal flaws" from an environmental perspective, and thereby necessitate substantial re-design or termination of the project.

The EIA process included a synthesized mapping of "no go" areas using environmental constraints provided by the specialist team. This mapping guided the layout of turbines and internal access roads and cabling. In this way, the environmental and social constraints of the site informed the scale and configuration of the proposed project. Through the course of the EIA process, the project layout went through several iterations after consultation with the specialists on the project team. This indicates how the EIA process has actively and effectively informed the

project planning. The specialists have used the three layouts as presented in Chapter 4. They were satisfied with these layouts provided their proposed mitigation measures were implemented.

Residual impacts are those that are expected to remain once appropriate mitigation has been implemented. The main residual negative impacts of the Ubuntu Wind Energy Project are the predicted impact on birds and bats, and the visual impact.

- The impact on birds arises from the possible displacement of priority bird species during the construction and operational phases of the project. The impacts are predicted to be low to medium (after mitigation).
- Another impact is infrequent bat mortality due to collision with the wind turbine blades or barotrauma and the visual impact of the turbines on the sense of place. The impacts on bats are predicted to be of **low** significance after mitigation (**confidence level is medium** as this is based on preliminary bat monitoring data). There is a general paucity of bat data in South Africa, and therefore ongoing pre-construction monitoring of bats on site is proposed to build a better understanding of the bat populations present and determine what management actions could be effective.
- The visual impacts of the turbines on the landscape character are predicted to be of **high** significance (negative). However, the visual impact could be perceived as a positive impact as the project represents a move towards renewable energy, which is a strategic priority for South Africa and the Eastern Cape Province. Of the several wind projects proposed in the Kouga area, the Ubuntu project is in perhaps the least sensitive location in terms of visual impacts, in that it is located at least 3 km inland of the N2 national road, and well inland from the coastal towns such as St Francis Bay and Jeffrey's Bay,

If the Ubuntu wind farm is established, the actual physical footprint of the wind turbines is limited to approximately 0.09 % of the total study area of 1 138 ha, and grazing and other agricultural activities can continue in parallel with the operation of the turbines. The project will have no significant impact in terms of loss of agricultural productivity.

In conclusion, given South Africa's need for additional electricity generation and efforts to decrease the country's proportional dependency on coal-based power, renewable energy has been identified as a national priority, with wind energy identified as one of the most readily available, technically viable and commercially cost-effective sources of renewable energy. Taking into consideration the findings of the EIA process for the proposed Ubuntu project near Jeffrey's Bay, it is the opinion of the Environmental Assessment Practitioner that the project benefits outweigh the costs, and that the project will make a positive contribution to steering South Africa on a pathway towards sustainable development. Provided that the specified mitigation measures are applied effectively, it is proposed that the project receives Environmental Authorization in terms of the EIA Regulations promulgated under the National Environmental Management Act (NEMA).