



GUNSTFONTEIN WIND ENERGY FACILITY AMENDMENT APPLICATION BAT IMPACT ASSESSMENT

On behalf of

Savannah Environmental (Pty) Ltd

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Figure 1 Updated Bat Sensitivity Map

1 INTRODUCTION

Gunstfontein Wind Farm (Pty) Ltd are submitting an amendment application to change various components related to the Gunstfontein Wind Energy Facility (WEF). Savannah Environmental (Pty) Ltd have contracted Arcus to undertake an assessment of the amendments with respect to potential impacts to bats. The amendments being applied for are as follows:

- Increase hub height to **up to** 150m;
- Increase rotor diameter to **up to** 180m;
- Increase rated power of turbines to up to 6.5 MW per WTG;
- Potential increase to WTG foundation area and laydown area; and
- Update the layout as required (including revised turbine positions and an additional access road).

Arcus assumes that “up to” implies that any size of hub height and rotor diameter that is appropriate (based on the client’s needs) and available to be supplied by turbine manufacturers may be selected for the Gunstfontein WEF as long as it does not exceed the maximum dimensions authorised.

1.1 Terms of Reference

The report has been compiled under the following terms of reference and provides:

- An assessment of all impacts related to the proposed changes;
- Advantages and disadvantages associated with the proposed changes;
- A comparative assessment of the impacts before the changes and after the changes; and
- Measures to ensure avoidance, management and mitigation of impacts associated with such proposed changes.

The assessment, undertaken according to the methodology of Savannah Environmental, clarifies whether the proposed changes will:

- Increase the significance of impacts originally identified in the EIA report, or lead to any additional impacts; or
- Have a zero or negligible effect on the significance of impacts identified in the EIA report; or
- Lead to a reduction in any of the identified impacts in the EIA report.

2 METHODOLOGY

In carrying out this assessment, Arcus conducted a literature review on bats and wind energy impacts with a focus on the relationship between turbine size and bat fatality. The literature review was carried out using the Web of Science® and Google Scholar using the following search terms:

bat OR fatality OR wind energy OR turbine OR wind turbine OR fatalities OR mortality OR mortalities OR kill* OR tower height OR height OR rotor swept zone OR rotor zone OR rotor swept area OR blades OR turbine blades OR influence OR increas* OR trend OR positive OR decreas* OR relation* OR wind farm OR wind energy facility OR carcass* OR chiroptera OR rotor diameter OR correlat* OR size*

In addition to the outputs from the above search, the following documentation were reviewed and used to provide context for the impact assessment:

- Environmental Authorisation (DEA REF 14/12/16/3/3/2/826),
- Savannah Environmental (2016). Final Environmental Impact Assessment Report: Gunstfontein Wind Energy Facility near Sutherland, Northern Cape Province, and

- Bioinsight (2015). Final bat pre-construction monitoring and Specialist Impact Assessment Report.

3 REVIEW

The core issue relevant to this assessment is the impact to bats of increasing the size of the turbines at the Gunstfontein WEF. The proposed amendment to the turbines at the wind farm would result in a greater rotor swept area per turbine and hence a potentially greater likelihood that bats would collide with turbine blades or experience barotrauma. Currently, the rotor swept area for each turbine will be up to 15,394 m² but based on the amendment being applied for, this would increase to up to 25,447 m².

Numerous studies support the hypothesis that taller wind turbines are associated with higher numbers of bat fatalities. Rydell et al. (2010) found a significant positive correlation between bat mortality with both turbine tower height and rotor diameter in Germany. However, there was no significant relationship between bat mortality and the minimum distance between the rotor and the ground. The maximum tower height in their study was 98 m and data on rotor diameter were not given. In addition, there was no relationship between bat fatality and the number of turbines at a wind energy facility. However, the largest wind energy facility in this study only has 18 turbines (Rydell et al. 2010) which is significantly fewer than the Gunstfontein WEF which is currently approved for up to 46 turbines.

In Greece, Georgiakakis et al. (2012) found that fatalities were significantly positively correlated with tower height but not with rotor diameter. In their study, maximum tower height and rotor diameter were 60 m and 90 m respectively. In Minnesota and Tennessee, USA, both Johnson et al. (2003) and Fiedler et al. (2007) showed that taller turbines with a greater rotor swept area killed more bats. The maximum heights of turbines in these two studies were 50 m and 78 m respectively. In Alberta, Canada, bat fatality rates differed partly due to differences in tower height but the relationship was also influenced by bat activity (Baerwald and Barclay 2009). For example, sites with high activity but relatively short towers had low bat fatality and sites with low activity and tall towers also had low bat fatality. At sites with high bat activity, an increase in tower height increased the probability of fatality. Maximum turbine height and rotor diameter in this study was 84 m and 80 m respectively. Despite the above support for the hypothesis that taller wind turbines kill more bats, in a review of 40 published and unpublished studies in North America, Thompson et al. (2017) found no evidence that turbine height or the number of turbines influences bat mortality. Berthinussen et al. (2014) also found no evidence of modifying turbine design to reduce bat fatalities. The relationship between bat mortality and turbine size, or number of turbines at a wind energy facility, is therefore equivocal.

Turbine size has increased since the above studies were published and no recent data of the relationship between bat fatality and turbine size are available. The maximum size of the turbines in the literature reviewed (where indicated in each study) for this assessment had towers of 98 m and rotor diameters of 90 m. Some towers were as short as 44 m and had blade tips extending down to only 15 m above ground level. The towers and blades under consideration in this assessment are significantly taller than this. The approved turbine dimensions would have a maximum ground clearance of 50 m assuming that the maximum dimensions (120 m high height and 140 m rotor diameter) currently authorised are used. The amendment would result in the blade tips extending from 60 m above ground level to 240 m, based on the maximum dimensions being applied for (i.e. a turbine with 90 m blades and a 150 m hub height). The minimum and maximum tip heights will change depending on the size of the turbines used.

It is possible that some bats species, particularly those not adapted to use open air spaces, are being killed at the lower sweep of the turbine blades so increasing the blade length

and having a shorter distance between the ground and the lowest rotor point may have a negative impact and potentially place a greater diversity of species at risk. In South Africa, evidence of fatality for species which typically do not forage in open spaces high above the ground, is available from several wind energy facilities (Aronson et al. 2013; Doty and Martin 2012; MacEwan 2016). Although Rydell et al. (2010) did not find a significant relationship between bat mortality and the minimum distance between the rotor and the ground, data from Georgiakakis et al. (2012) suggest that as the distance between the blade tips and the ground increases, bat fatality decreases.

It is not known what the impact of turbines of the size proposed for the Gunstfontein WEF would be to bats because of a lack of published data from wind energy facilities with turbines of a comparative size. Hein and Schirmacher (2016) suggest that bat fatality should continue to increase as turbines intrude into higher airspaces because bats are known to fly at high altitudes (McCracken et al. 2008; Peurach et al. 2009; Roeleke et al. 2018). However, McCracken et al. (2008), who recorded free-tailed bats in Texas from ground level up to a maximum height of 860 m, showed that bat activity was greatest between 0 and 99 m. This height band accounted for 27 % of activity of free-tailed bats, whereas the 100 m to 199 m height band only accounted for 6 %.

In South Africa, simultaneous acoustic monitoring at ground level and at height is a minimum standard for environmental assessments at proposed wind energy facilities. Based on unpublished data from 16 such sites Arcus has worked at, bat activity and species diversity is greater at ground level than at height. Therefore, even though bats are recorded at heights that would put them at risk from taller turbines, the proportion of bats that would be at risk might be less. Further, the number of species that might be impacted would decrease because not all bat species use the airspace congruent with the rotor swept area of modern turbines owing to morphological adaptations related to flight and echolocation. Bats that are adapted to use open air space, such as free-tailed and sheath-tailed bats, would be more at risk.

In the United Kingdom, both Collins and Jones (2009) and Mathews et al. (2016) showed that fewer species, and less activity, were recorded at heights between 30 m and 80 m compared to ground level. In two regions in France, Sattler and Bontadina (2005) recorded bat activity at ground level, 30 m, 50 m, 90 m and 150 m and found more species and higher activity at lower altitudes. Roemer et al. (2017) found that at 23 met masts distributed across France and Belgium, 87 % of bat activity recorded was near ground level. However, the authors also showed a significant positive correlation between a species preference for flying at height and their collision susceptibility, and between the number of bat passes recorded at height and raw (i.e. unadjusted) fatality counts. In a similar study in Switzerland, most bat activity was recorded at lower heights for most species but the European free-tailed bat had greater activity with increasing height (Wellig et al. 2018). These results suggest that on average, bat activity is greater at lower heights but that there are important differences across species – those species adapted to using open air spaces are at greater risk.

4 IMPACT ASSESSMENT

During the pre-construction bat monitoring, microphones were placed at 7 m and 80 m on the met mast. Five microphones were placed in the WEF site at 10 m and one outside the boundaries of the WEF area for control purposes at 10 m.

Based on the pre-construction monitoring data, bat activity at the site is considered low, with an average below 2 passes per hour. The activity data across all the detectors combined showed higher activity in summer, spring and autumn and almost no activity during winter. Most bat activity was detected at ground level and only 36 % of the overall bat activity was detected at 80 m. In addition, there was a clear influence of specific

microhabitat features on bat activity. For example, greater activity was recorded in a water line with riverine vegetation.

The exact turbine dimensions being applied for are up to 150 m for the hub height, and up to 180 m for the rotor diameter. Within this range, the impacts to bats and associated buffer zones needed to limit impacts (as an initial mitigation) will vary depending on the size of the turbines used. Turbines with a lower ground clearance will need to be placed further away from buffers than turbines with a higher ground clearance. For example to determine the buffer distances required to ensure that no turbine blades enter the bat buffers, the following formula should be used (Mitchell-Jones and Carlin 2014):

$$b = \sqrt{(bd + bl)^2 - (hh - fh)^2}$$

Where: bd = buffer distance, bl = blade length, hh = hub height and fh = feature height (zero in this instance). "b" is the distance required between the base of the turbine and the edge of the buffer area, to ensure no blade overhang into the buffer area.

Thus, based on the above, assuming a buffer of 200 m for example, a turbine with a rotor diameter of 140 m and hub height of 120 m (i.e. 50 m ground clearance) will need to be 242 m ("b") away from the buffered feature (i.e. base of turbine must be positioned 242 m away from the buffered feature). A turbine with a rotor diameter of 160 m and hub height of 150 m (i.e. 70 m ground clearance) will need to be 236 m away.

The original assessment stipulated a buffer of 500 m for all confirmed bat roosts, permanent water bodies, water lines where high activity was recorded, and around the upper ridge line. A 200 m buffer was stipulated for all potential roosting sites, permanent water bodies and water lines (unless high activity was recorded), temporary water bodies, and linear features with potential to be used by bats for commuting. In addition, the EA stated that a 500 m buffer must be applied for all potential and confirmed bat roosting sites. While not stated in the pre-construction bat monitoring report (or the EA), all of these buffers need to be to blade tip according to the best practise guidelines. Therefore, the distance between these features and the turbine base ("b") will need to be calculated using the Mitchell-Jones and Carlin equation once the turbine size is selected. Any turbines within bat buffers will need to be relocated. This must be considered and addressed during the detailed design phase. The delineated bat buffers are no-go areas for turbines only, and turbines (including turbine blades) must not be placed in these buffer areas. It should be noted that these buffers apply only to turbines and not associated infrastructure such as roads and powerlines.

It is unclear which aquatic GIS dataset(s) Bioinsight used for the buffers. There are several instances where it appears as if the buffer distance were measured from the centre of the aquatic feature, and not the edge which is best practise, or available data were not used (Plate 1). This results in the current buffers providing inadequate protection against potential impacts as a smaller area than required has been buffered. Arcus have re-created the sensitivity map using the National Geo-Spatial Information Topographic dataset (2015), and the National Freshwater Ecosystems Priority Areas database (2011). The updated sensitivity map (Figure 1) shows that several turbines border the bat buffers and their blades may intrude across bat sensitive areas, depending on the final turbine specifications. The Mitchell-Jones and Carlin equation must be used to adjust the positioning of these turbines to the appropriate distance, during the design phase.

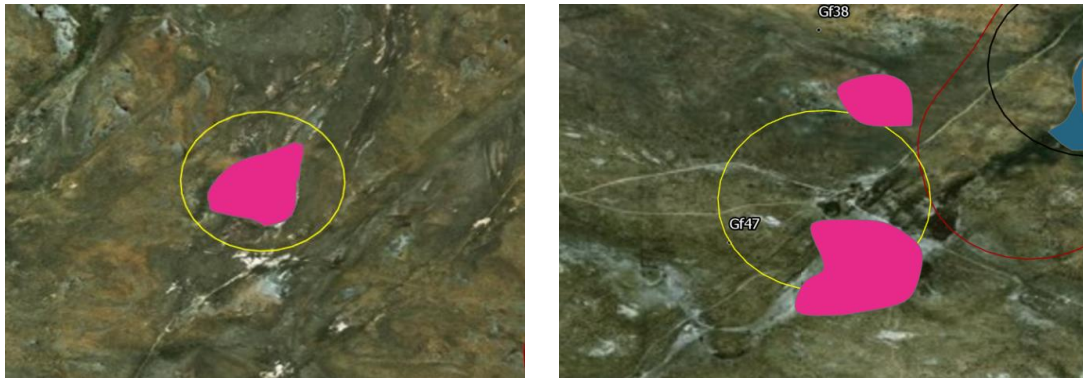


Plate 1: Examples of bat buffers (yellow rings) of aquatic features. The pink polygons are NFEPA wetlands according to the 2011 NFEPA database. On the left, the buffer is approximately 50 m from the wetland edge instead of 200 m. On the right, some NFEPA wetlands have not been buffered.

No bat activity data are available in the area between the heights of 10 m and 80 m or over 80 m, because activity at these heights was not monitored. Despite the available pre-construction monitoring data showing that bat activity at 80 m is low, it would be preferential to maximise the distance between the ground and blade tips by using turbines with the shortest possible blades and the highest possible hub height. This would reduce the number of species potentially impacted upon by turbine blades during the operation phase. It would also be preferential to use shorter blades so that they don't intrude into higher airspaces and in so doing reduces the potential impact to high flying species such as free-tailed bats. Despite the low activity at height, increasing evidence suggests that bats actively forage around wind turbines (Cryan et al. 2014; Foo et al. 2017) so the installation of turbines in the landscape may alter bat activity patterns, either by increasing activity at height and/or increasing the diversity of species making use of higher airspaces.

Of the impacts identified in the EIA, only mortality of species due to collision with turbine blades or due to barotrauma, and cumulative impacts, are relevant to this amendment. The significance of all other identified impacts on bats associated with the development will remain the same as per the EIA.

The potential collision impact to bats is currently rated as medium before, and low after mitigation with avoiding sensitive areas for bats being the major mitigation measure proposed. The significance of the impact after the proposed change would be dependent on the size of the turbines chosen. The assessments here (Table 1 and Table 2) are based on the scenario where turbines of the maximum dimensions being applied for are used. This would increase risk to high flying species such as free-tailed bats because the turbines blades would extend higher into the air.

Table 1: Impact Assessment Table for Increasing Turbine Size at the Gunstfontein WEF

Nature: Mortality of bats due to collision with turbine blades or barotrauma caused by turbine operation.				
	Authorised (Savannah 2016)		Proposed Amendment	
	Without Mitigation	With Mitigation	Without Mitigation	With Mitigation
Extent	Local (1)	Local (1)	Local (2)	Local (2)
Duration	Permanent (5)	Permanent (5)	Long term (4)	Long term (4)
Magnitude	Moderate (6)	Low (4)	Moderate (7)	Low (4)
Probability	Highly probable (4)	Probable (3)	Highly probable (4)	Probable (3)
Significance	48 (Medium)	30 (Low)	52 (Medium)	30 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Reversibility	Irreversible	Irreversible	Irreversible	Irreversible
Irreplaceable loss of resources?	Yes	Yes	Yes	Yes

Can impacts be mitigated?	Yes		Yes	
Mitigation: Mitigation measures <ul style="list-style-type: none"> All currently proposed mitigation measures proposed by Bioinsight (2015), Savannah (2016) and in the EA should be adhered to. This includes adhering to the updated sensitivity map (Figure 1) which may require repositioning turbines if their blades will intrude into these buffers. These buffers are regarded as no-go areas for turbines only, and other infrastructure (roads, cables etc) are permissible. A bat specialist must map the final turbine layout before micro-siting and assess whether all turbines are appropriately sited such that their blades do not intrude into bat buffers. All mitigation measures to protect bats proposed in the EMPr (Savannah 2016) must be adhered to. Additional mitigation measures <ul style="list-style-type: none"> The impacts presented can be mitigated by using turbines which maximise the ground clearance as much as possible, and by minimising the tip height (i.e. the distance between the ground and the blade tip at its highest point). <p>To be included in the EA: a minimum buffer to blade tip for all bat buffer zones is required (buffer distances are on page 66 of Bioinsight 2015, and mapped in Figure 1).</p>				
Cumulative Impact: see Table 2				
Residual Impacts: Residual impacts may still remain even if the moderate and high sensitivity buffers are adhered to and by using turbines of an appropriate size to limit bat fatalities. Bat fatalities are a widely occurring phenomenon having been reported across Europe, North America, Central America, Brazil, India, Australia and South Africa (Baerwald and Barclay 2011; Barros et al. 2015; Hein and Schirmacher 2016; Kumar et al. 2013; Rodríguez-Durán and Feliciano-Robles 2015; Rydell et al. 2010). Further, evidence has shown that pre-construction monitoring data may not be able to adequately predict post-construction fatality risk (Hein et al. 2013), and that bats actively investigate and forge around turbines (Cryan et al. 2014; Foo et al. 2017). This suggests that there may still be fatality impacts. Residual impacts can likely be reduced to very low if curtailment is used when appropriate and this has been shown to be one of the most effective mitigation measures (Arnett and May 2016).				

Table 2: Cumulative Impact Assessment

Nature: Cumulative mortality of bats due to collision with turbine blades or barotrauma caused by turbine operation across multiple wind energy facilities. The cumulative impacts will depend on the number of wind energy facilities in the region, the species involved, the levels of bat mortality and mitigation measures implemented at each wind energy facility. Bats reproduce slowly (Barclay and Harder 2003) and their populations can take long periods of time to recover from disturbances so the cumulative impacts can be high if appropriate management and mitigation is not implemented. There are approximately 17 wind energy facilities planned within a 50 km radius of the Gunstfontein WEF. The assessment below assumes all 17 facilities implement appropriate mitigation measures.				
	Authorised (Bioinsight 2015)		Proposed Amendment	
	Without Mitigation	With Mitigation	Without Mitigation	With Mitigation
Extent	Regional (2)	Local (1)	Regional (2)	Regional (2)
Duration	Permanent (5)	Permanent (5)	Long term (4)	Long term (4)
Magnitude	Moderate (6)	Low (4)	High (8)	Moderate (6)
Probability	Highly probable (4)	Probable (3)	Definite (5)	Probable (3)
Significance	52 (Medium)	30 (Low)	70 (High)	39 (Medium)
Status (positive or negative)	Negative	Negative	Negative	Negative
Reversibility	Irreversible	Irreversible	Low	Low
Irreplaceable loss of resources?	Yes	Yes	Yes	Yes
Can impacts be mitigated?	Yes		Yes	
Mitigation: Mitigation measures <ul style="list-style-type: none"> All currently proposed mitigation measures proposed by Bioinsight (2015), Savannah (2016) and in the EA should be adhered to. This includes adhering to the updated sensitivity map (Figure 1) which may require repositioning turbines if their blades will intrude into these buffers. The buffers in the updated sensitivity map are regarded as no-go areas for turbines only. A bat specialist must map the final turbine layout and assess whether all turbines are appropriately sited such that their blades do not intrude into bat buffers. All mitigation measures to protect bats proposed in the EMPr (Savannah 2016) must be adhered to. Additional mitigation measures				

- The impacts presented can be mitigated by using turbines which maximise the ground clearance as much as possible, and by minimising the tip height (i.e. the distance between the ground and the blade tip at its highest point).

Residual Impacts: Residual impacts may still remain even if the moderate and high sensitivity buffers are adhered to and by using turbines of an appropriate size to limit bat fatalities. Bat fatalities are a widely occurring phenomenon having been reported across Europe, North America, Central America, Brazil, India, Australia and South Africa (Baerwald and Barclay 2011; Barros et al. 2015; Hein and Schirmacher 2016; Hull and Cawthen 2012; Kumar et al. 2013; Rodríguez-Durán and Feliciano-Robles 2015; Rydell et al. 2010). Further, evidence has shown that pre-construction monitoring data may not be able to adequately predict post-construction fatality risk (Hein et al. 2013), and that bats actively investigate and forge around turbines (Cryan et al. 2014; Foo et al. 2017). This suggests that there may still be fatality impacts. Residual impacts can likely be reduced to very low if curtailment is used when appropriate as this has been shown to be one of the most effective mitigation measures (Arnett and May 2016).

5 CONCLUSION

Compared to the previous impact assessment undertaken by Bioinsight in 2015, it is likely that the amendments to the turbine dimensions proposed for the Gunstfontein WEF would (without mitigation) slightly increase mortality impacts to bats. This is primarily because the blades will extend higher into the air and place bats using open spaces for commuting and foraging at greater risk. Based on bat activity levels as assessed from pre-construction monitoring data, impacts to bats are likely to be of a medium significance before mitigation and low after mitigation. Cumulative mortality impacts after mitigation would also increase. Cumulative impacts are likely to be of a high significance before mitigation and medium after mitigation. The magnitude of bat impacts may differ based on the exact dimensions of the turbines chosen. Turbines with longer blades that reach lower to the ground would likely have a greater impact by putting a greater diversity of species, and greater magnitude of individual bats, at risk. Longer blades will also extend higher into the air and place open air species such as free-tailed bats at greater risk. Therefore, we recommend maximising the ground clearance and minimising the tip height (i.e. the distance between the ground and the blade tip at its highest point) as much as possible.

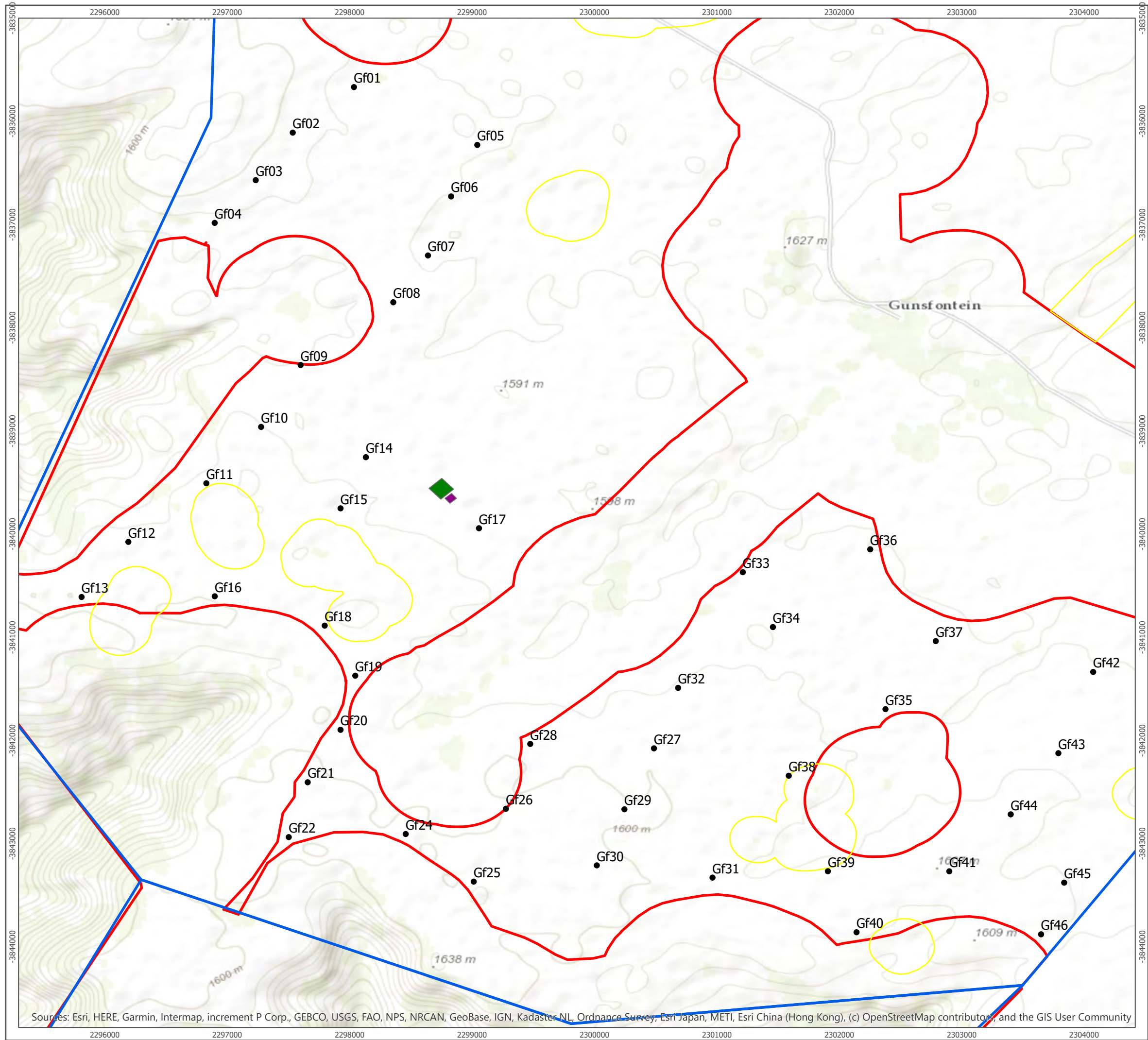
The key initial mitigation measure that should be implemented at the Gunstfontein WEF would be adherence to the updated sensitivity map (Figure 1). The exact combination of turbine dimensions that will be selected is unknown but depending on the size of the turbines selected, several turbines will need to be micro-sited to prevent the blade tips intruding into bat buffers as several turbines border bat sensitive areas (Figure 1). The final layout (which includes revised turbine positions and an additional access road) will therefore need to be assessed by a bat specialist to ensure this is adhered to once the turbines are chosen. This can be done during the pre-construction specialist walk-through and micro-siting process and must include the specialist mapping the final layout and determining if all turbine blades are outside bat buffers. Any turbine micro-siting will need to be done before construction. Residual impacts that occur will need to be evaluated during the operation phase using carcass searches to monitor actual impacts.

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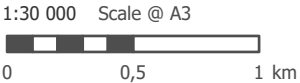
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- Site Boundary
- Proposed Turbine Layout
- O&M Building and Laydown Area
- Substation
- Bat No-Go Areas
- Bat High Sensitivity Areas



Produced By: JA	Ref: 2319-REP-002
Checked By: AB	Date: 30/Apr/2019

Bat Sensitivity Map
Figure 01

**Guntfontein Wind Energy Facility
Amendment Application
Impact Assessment**

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community