AMENDMENT TO THE ENVIRONMENTAL AUTHORISATION: PROPOSED GUNSTFONTEIN WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE,

NORTHERN CAPE PROVINCE

DEA Ref. No: 14/12/16/3/3/2/826

COMMENTS AND RESPONSES REPORT

TABLE OF CONTENT

1.	COMMENTS RECEIVED:	Organs of State	. 1
2.	COMMENTS RECEIVED:	Stakeholders and Interested and Affected Parties	14

The Amendment Motivation Report's availability was announced on Friday, 31 May 2019 and was made available for 30-day review and comment period from **Friday**, **10 May 2019** to **Monday**, **10 June 2019**. A subset of registered I&APs who were inadvertently excluded from the aforementioned notification were subsequently notified on Friday 31 May 2019 and provided with a full 30-day review and comment period from **Friday 31 May 2019 to Tuesday 2 July 2019**. The Comments and Responses Report includes all written comments received during the commenting periods and those written comments submitted on the Motivation Report, and responses thereto.

LIST OF ABBREVIATIONS / ACRONYMS

AMP	Archaeology, Palaeontology and Meteorites	BGG	Burial Grounds and Graves
C&RR	Comments and Responses Report	DAFF	Department of Agriculture, Forestry and Fisheries
DEA	Department of Environmental Affairs	DWS	Department of Water and Sanitation
EA	Environmental Authorisation	EMPr	Environmental Management Programme
EWT	Endangered Wildlife Trust	I&APs	Interested and Affected Parties
MCSA	Mountain Club of South Africa	NHRA	National Heritage Resources Act
SACAA	South African Civil Aviation Authority	SAHRA	South African Heritage Resources Agency
SANRAL	South African National Roads Agency Limited	Snr	Senior

1. COMMENTS RECEIVED: Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	The SAHRA Archaeology, Palaeontology and Meteorites	Natasha Higgitt	The applicant notes SAHRA's requirements and accepts the
	(APM) Unit has no objection to the overall proposed	Heritage Officer	revised wording for EA Condition 123, as proposed by
	amendment to the authorised development.	SAHRA	SAHRA. The requested amendment to Condition 123 will be
	With regards to the proposed amendment to condition	(Case ID: 8383)	updated in the final amendment report and amendment
	123, SAHRA requests that the amendment read as		application form, to reflect SAHRA's requirements. The
	follows:	Letter: 31-05-2019	applicant acknowledges that the final layout must be
	"Pre-construction archaeological walkthrough is		physically inspected by a qualified archaeologist via a pre-
	required of the final layout. A report detailing the results		construction archaeological walkthrough, and a report
	of the walk-down must be submitted to SAHRA for		submitted to SAHRA for comment.
	comment. The holder must keep a list documenting all		
	features of archaeological significance, identified by		
	the archaeologist, which may be impacted by the		
	development and which must be demarcated as no-		
	go areas."		
	SAHRA does not accept the request that either a walk-		
	down or a desktop study be undertaken. The final layout		
	of the development must be physically inspected by a		
	qualified archaeologist and a report must be submitted to SAHRA for comment.		
			The final Amendment Mativetics Depart and EMPr will be
	The following additional conditions must be included in the Environmental Management Programme (EMPr) and		The final Amendment Motivation Report and EMPr will be uploaded to SAHRIS. This is stipulated in the EMPr
	completed should the Amended EA be granted:		opiodaed to sankis. This is stipulated in the EMPI
	The Final Amendment Report and EMPr must be		The correct procedure will be followed should any evidence
	uploaded to the SAHRIS application for record		of archaeological sites be discovered. Should any unmarked
	purposes;		human burials be uncovered, the SAHRA Burial Grounds and
	 If any evidence of archaeological sites or remains 		Graves Unit will be alerted immediately.
	(e.g. remnants of stone-made structures, indigenous		Clares of in this be dioffed in inflodiciony.
	ceramics, bones, stone artefacts, ostrich eggshell		
	fragments, charcoal and ash concentrations), fossils		
	1 agricino, charcoal and astr concernitations, tossiis		

NO.	COMMENT	RAISED BY	RESPONSE
	or other categories of heritage resources are found		Appropriate management and monitoring measures to
	during the proposed development, SAHRA APM Unit		avoid or mitigate impacts to archaeological resources, as
	(Natasha Higgitt/Phillip Hine 021 462 5402) must be		well as a chance-finds procedure, are stipulated in the EMPr.
	alerted as per section 35(3) of the NHRA. If unmarked		
	human burials are uncovered, the SAHRA Burial		
	Grounds and Graves (BGG) Unit (Thingahangwi		
	Tshivhase/Mimi Seetelo 012 320 8490), must be alerted		
	immediately as per section 36(6) of the NHRA. A		
	professional archaeologist or palaeontologist,		
	depending on the nature of the finds, must be		
	contracted as soon as possible to inspect the findings.		
	If the newly discovered heritage resources prove to		
	be of archaeological or palaeontological		
	significance, a Phase 2 rescue operation may be		
	required subject to permits issued by SAHRA;		
	The decision regarding the Amended EA Application		The comment is acknowledged, the final decision regarding
	must be communicated to SAHRA and uploaded to		the Amendment application will be communicated to
	the SAHRIS Case application.		SAHRA and uploaded to SARHIS.
2.	Eskom requirements for work at or near Eskom	John Geeringh	The Applicant acknowledges Eskom's requirements for work
	infrastructure.	Snr Consultant:	at or near Eskom infrastructure and confirms that it will
	1. Eskom's rights and services must be acknowledged	Environmental	adhere to Eskom's requirements during the detailed design,
	and respected at all times.	Management	construction and operation of the project. Eskom's right's
	2. Eskom shall at all times retain unobstructed access to	Eskom Group	and services are acknowledged and Eskom's requirements
	and egress from its servitudes.	Capital: Land	in relation thereto will be adhered to.
	3. Eskom's consent does not relieve the developer from	Development	
	obtaining the necessary statutory, land owner or		
	municipal approvals.	Letter: 10-06-2019	
	4. Any cost incurred by Eskom as a result of non-		
	compliance to any relevant environmental legislation		
	will be charged to the developer.		

NO.	CC	OMMENT	RAISED BY	RESPONSE	
	5. If Eskom has to incur	any expenditure in order to			
	comply with statutory	clearances or other regulations			
	as a result of the deve	loper's activities or because of			
	the presence of his e	quipment or installation within			
	the servitude restriction	n area, the developer shall pay			
	such costs to Eskom or	n demand.			
	6. The use of explosives of	of any type within 500 metres of			
	Eskom's services shall c	only occur with Eskom's previous			
	written permission. If s	such permission is granted the			
	developer must give	at least fourteen working days			
	prior notice of the co	mmencement of blasting. This			
	allows time for arro	ingements to be made for			
	supervision and/or pr	ecautionary instructions to be			
	issued in terms of the	blasting process. It is advisable			
	to make application se	eparately in this regard.			
	7. Changes in ground le	evel may not infringe statutory			
	ground to conductor	clearances or statutory visibility			
	clearances. After any	changes in ground level, the			
	surface shall be rehak	pilitated and stabilised so as to			
	•	measures taken shall be to			
	Eskom's satisfaction.				
		ole for the death of or injury to			
	• •	e loss of or damage to any			
	property whether as a	result of the encroachment or			
		vitude area by the developer,			
	~	ctors, employees, successors in			
	title, and assignees. Th	e developer indemnifies Eskom			
	· ·	or damages including claims			
	pertaining to consequ	ential damages by third parties			
	and whether as a resu	olt of damage to or interruption			

NO.	COMMENT	RAISED BY	RESPONSE
	of or interference with Eskom's services or apparatus		
	or otherwise. Eskom will not be held responsible for		
	damage to the developer's equipment.		
	9. No mechanical equipment, including mechanical		
	excavators or high lifting machinery, shall be used in		
	the vicinity of Eskom's apparatus and/or services,		
	without prior written permission having been granted		
	by Eskom. If such permission is granted the developer		
	must give at least seven working days' notice prior to		
	the commencement of work. This allows time for		
	arrangements to be made for supervision and/or		
	precautionary instructions to be issued by the relevant		
	Eskom Manager.		
	Note: Where and electrical outage is required, at		
	least fourteen work days are required to arrange it.		
	10. Eskom's rights and duties in the servitude shall be		
	accepted as having prior right at all times and shall		
	not be obstructed or interfered with.		
	11. Under no circumstances shall rubble, earth or other		
	material be dumped within the servitude restriction		
	area. The developer shall maintain the area		
	concerned to Eskom's satisfaction. The developer		
	shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.		
	12. The clearances between Eskom's live electrical		
	equipment and the proposed construction work shall		
	be observed as stipulated by Regulation 15 of the		
	Electrical Machinery Regulations of the Occupational		
	Health and Safety Act, 1993 (Act 85 of 1993).		
	11001111 0110 301619 ACI, 1773 (ACI 03 01 1773).		

NO.	COMMENT	RAISED BY	RESPONSE
	13. Equipment shall be regarded electrically live and		
	therefore dangerous at all times.		
	14. In spite of the restrictions stipulated by Regulation 15		
	of the Electrical Machinery Regulations of the		
	Occupational Health and Safety Act, 1993 (Act 85 of		
	1993), as an additional safety precaution, Eskom will		
	not approve the erection of houses, or structures		
	occupied or frequented by human beings, under the		
	power lines or within the servitude restriction area.		
	15. Eskom may stipulate any additional requirements to		
	highlight any possible exposure to Customers or Public		
	to coming into contact or be exposed to any dangers		
	of Eskom plant.		
	16. It is required of the developer to familiarise himself		
	with all safety hazards related to Electrical plant.		
	17. Any third party servitudes encroaching on Eskom		
	servitudes shall be registered against Eskom's title		
	deed at the developer's own cost. If such a servitude		
	is brought into being, its existence should be endorsed		
	on the Eskom servitude deed concerned, while the		
	third party's servitude deed must also include the		
	rights of the affected Eskom servitude.		
	Wayleave requirements and Renewable Energy Plant		
	Setback to Eskom Infrastructure documents included in		
	Appendix G6 of the final Motivation Report.	Carrella l'ai de Diamaiai	
3.	The Department has the following comments on the	Samkelisiwe Dlamini	
	abovementioned amendment application:	Case Officer	Diagram note that name of the appaignists now the EAD is such
	(a) Specific comments	DEA	Please note that none of the specialists nor the EAP have
	(i) A layout plan showing the 90m set back line of all	Lottor: 11.04.2010	identified the need for a "90m setback line". Each specialist
	turbines must be included in the final report.	Letter: 11-06-2019	has identified site-specific sensitivity areas or no-go buffer

NO.	COMMENT	RAISED BY	RESPONSE
			areas within which no turbines may be located. The amended layout adheres to all mapped buffer / no-go areas, and adheres to the recommendations of the specialists.
			In subsequent correspondence with the Department it was confirmed that a 70m setback line would be sufficient for all avifaunal sensitivities. This is in line with the avifaunal specialist recommendation with regards to the sensitive areas. (The correspondence is included in Appendix G6 of the Final Motivation report.) The avifaunal specialist has stipulated that turbines should be positioned at least 70m away from the edge of the avifaunal exclusion zones, and the amended layout adheres to this requirement.
			The bat specialist has confirmed that all turbines are currently positioned outside of the site-specific bat buffer areas (buffer areas range from 200m – 500m depending on the feature being buffered), but has further recommended that once the final turbine has been selected, a bat specialist must assess the final layout during the walk-through and micrositing process to confirm that all turbines and their blades remain outside of the buffer areas.
	(ii) Confirmation that the specialist assessed and provided a motivation in terms of regulation 32 relating to all amendments applied for.		It can be confirmed that the Section 5 , 6 and 7 of the Final Motivation report as well as the updated EMPr provides assessment and motivations in terms of regulation 32. The Final Motivation report reflects:

NO.	COMMENT	RAISED BY	RESPONSE
			 (i) an assessment of all impacts related to the proposed change (Section 5); (ii) advantages and disadvantages associated with the proposed change (Section 6); and (iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change (Section 7); and (iv) any changes to the EMP (Appendix I)
	(b) Public participation		The relevant stakeholders were notified as per the comments
	(i) Please ensure that comments from all relevant		from the Department. Comments received from all relevant
	stakeholders are submitted to the Department with		stakeholders, have been included within this C&RR. Proof of
	the final report. This includes but is not limited to the		correspondence to and from these stakeholders, including
	Western Cape Department of Environmental Affairs		comments received, is included in Appendix G3 and
	and Development Planning, the Department of		Appendix G6 of the final Motivation Report.
	Forestry and Fisheries (DAFF), the provincial		
	Department of Agriculture, the South African Civil		The proposed project is located within the Karoo Hoogland
	Aviation Authority (SACAA), the Department of		Local Municipality and the Northern Cape Department of
	Transport, the Laingsburg Local Municipality, the		Environment and Nature Conservation and these
	Department of Water and Sanitation (DWS), the		departments were notified of the proposed amendment.
	South African National Roads Agency Limited		
	(SANRAL), the South African Heritage Resources		
	Agency (SAHRA), the Endangered Wildlife Trust		
	(EWT), BirdLife SA, the Department of Mineral		
	Resources, the Department of Rural Development		
	and Land Reform, and the Department of		
	Environmental Affairs: Directorate Biodiversity and Conservation.		
			As not Dogulation 14 a CODD has been drafted which
	(ii) A Comments and Response trail report (C&R) must		As per Regulation 44, a C&RR has been drafted which includes all the written comments received on the
	be submitted with the final report. The C&R report		
	must incorporate all comments for this application.		Motivation Report that was made available for a 30-day
	The C&R report must be a separate document from		

NO.	COMMENT	RAISED BY	RESPONSE
	the main report and the format must be in the table		review and comment and are included in Appendix G5 of
	format. Please refrain from summarising comments		the final Motivation Report.
	made by I&APs. All comments from I&APs must be		
	copied verbatim and responded to clearly. Please		All written comments received from registered I&AP have
	note that a response such as "noted" is not regarded		been recorded <u>verbatim</u> and have not been summarised.
	as an adequate response to I&APs' comments.		
	(iii) Please ensure that all issues raised and comments		Responses to written comments / concerns / issues raised
	received during the circulation of the draft report		have been provided and addressed by the project team.
	from registered I&APs and organs of state which		Where applicable, revisions have been applied to the draft
	have jurisdiction in respect of the proposed activity		report and EMPr, in response to stakeholder comments. Proof
	are adequately addressed in the final report. Proof		of correspondence to and from these stakeholders is
	of correspondence with the various stakeholders		included in Appendices G2 , G3 and G6
	must be included in the final report. Should you be		
	unable to obtain comments, proof should be		Savannah Environmental is cognisant of the need to comply
	submitted to the Department of the attempts that		with Regulations 39, 40, 41, 42, 43 and 44 of the EIA
	were made to obtain comments. The Public		Regulations, 2014, as amended.
	Participation Process must be conducted in terms of		
	Regulation 39, 40, 41, 42, 43 & 44 of the EIA		» Regulation 39:
	Regulations 2014 as amended.		It is confirmed that the registered landowner has been part
			of the consultation process for this Amendment process.
			» Regulation 40:
			The Motivation Report has been made available to all
			registered I&APs and State Departments as required. To
			provide potential I&APs an opportunity to comment on the
			Motivation Report, an advertisement was placed in a local
			community newspaper, Noordwester on Friday, 10 May
			2019. Proof (tearsheet) of advertisement is included in
			Appendix G4.

NO.	COMMENT	RAISED BY	RESPONSE
			» Regulation 41:
			A site notice was erected at the commencement of the
			Amendment Application process. Proof of site notice is
			included in Appendix G4 .
			An advertisement was placed in a local community
			newspaper, Noordwester on Friday, 10 May 2019. Proof
			(tearsheet) of advertisement is included in Appendix G4 .
			» Regulation 42:
			A database with the contact details of registered I&APs, as
			provided by I&APs, is included in Appendix G1 .
			» Regulation 43:
			The Motivation Report was made available for a 30-day
			public review period from Friday, 31 May 2019 to Tuesday, 01
			July 2019. The Motivation Report was distributed to relevant
			Organs of State and a copy was made available at the
			Sutherland Public Library, Sarel Cilliers Street, Sutherland. The
			Motivation Report was also available for download from
			Savannah Environmental's website
			(https://www.savannahsa.com/public-documents/energy-
			generation/) or on CD on request from Savannah
			Environmental (Pty) Ltd. A subset of registered I&APs who
			were inadvertently excluded from the aforementioned
			notification were subsequently notified on Friday 31 May
			2019 and provided with a full 30-day review and comment
			period from Friday 31 May 2019 to Tuesday 2 July 2019.
			» Regulation 44:

NO.	COMMENT	RAISED BY	RESPONSE
			Comments from I&APs received throughout the Application
			process and those submitted during the Motivation Report
			30-day review and comment periods are included in this
			C&RR which is attached as Appendix G5 to thes final
			Motivation Report.
	(iv) The final report must also indicate that this draft		Proof of distribution of the Motivation Report is included in
	report has been subjected to a public participation		Appendix G2 and Appendix G3 including the reminder e-
	process.		mail for submission of written comments.
	(c) Layout & Sensitivity Maps		Appendix H of the Final Motivation Report includes an
	(i) The final report must include an environmental		environmental sensitivity map indicating environmental
	sensitivity map indicating environmental sensitive		sensitive areas and features identified during the assessment
	areas and features identified during the assessment		process.
	process.		
	(ii) The final report must include a map combining the		The layout map superimposed on the environmental
	final layout map superimposed (overlain) on the		sensitivity map will be included in Appendix H of the Final
	environmental sensitivity map.		Motivation report.
	(d) <u>Specialist assessments</u>		The terms of reference will for all the identified specialist
	(i) The EAP must provide confirmation that all specialists		studies will be provided in Appendix A-F of the Final
	were provided with the same request of proposed		Motivation Report. This will include a detailed description of
	amendments as well as ensure that the terms of		the study's methodology indication of the locations and
	reference for all the identified specialist studies must		descriptions of the development footprint, and all other
	include the following:		associated infrastructures that has been assessed.
	A detailed description of the study's		
	methodology; indication of the locations and		
	descriptions of the development footprint, and		
	all other associated infrastructures that they		
	have assessed and are recommending for		
	authorisations.		

NO.	COMMENT	RAISED BY	RESPONSE
	Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.		Descriptions of any limitations (if applicable) to the studies are stated in each specialist report, submitted in Appendix A-F of the Final Motivation Report.
	Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the `no-go' areas.		It is acknowledged that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed. In any instance where the specialist's definition of 'no-go' area is different from the Department's definition, this will be specified in the report.
	Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.		Please note that the avifaunal no-go buffer areas and the bat no-go buffer areas are no-go's for turbines only, and associated infrastructure (e.g. roads and cables) are permissible, with mitigation. This is clarified in the respective specialist reports.
			In terms of ecological sensitivities, please note that according the the specialist's classification system, only those areas classified as "Very high sensitivity" are no-go areas. This is stated in the ecological report (Appendix C, refer to Table 1)
	All specialist studies must be final, and provide detailed/practical mitigation measures and recommendations, and must not recommend further studies to be completed post EA.		The specialist studies are final and include detailed/practical mitigation measures and recommendations which will also be reflected in the motivation report. These reports are included as Appendix A-F of the Final Motivation report.
	Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.		All specialists have assessed cumulative impacts in the reports, these will be submitted with the Final Motivation report. These reports are included as Appendix A-F.

NO.	COMMENT	RAISED BY	RESPONSE
	A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.		
	Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.		
	The significance rating must also inform the need and desirability of the proposed development.		The significance rating does include the need and desirability of the proposed amendment.
	A cumulative impact environmental statement on whether the proposed development must proceed.		A cumulative impact environmental statement will be provided in Section 9 of the Final Motivation report.
	(ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.		Should any contradicting statements arise from the specialist reports it will be addressed by the EAP in the Final Motivation report.
	(e) General Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.		All mitigation measures provided by specialists are in line with the most recent guidelines. The Avifaunal report (Appendix A) made use of the most recent guidelines, including the Verreaux Eagle (VE) Guidelines published in 2017 and recommended an increased VE buffer as a result. The Bats Report (Appendix B) also made use of updated

NO.	COMMENT	RAISED BY	RESPONSE
			guidelines and current datasets to inform new buffer areas
			and buffer distances imposed on the layout.
	Please note that in terms of Regulation 32 of EIA		This comment is acknowledged regarding the timeframe of
	regulation 2014 as amended, the applicant is required		this application.
	within a specified timeframe to submit a report to this		
	Department in light of the proposed amendments.		
	Further note that in terms of Regulation 45 of the EIA		This comment is acknowledged, the applicant intends to
	Regulations 2014, as amended, this application will lapse		stay within the regulated timeframe in terms of Regulation 45
	if the applicant fails to meet any of the timeframes		of the EIA Regulations 2014, as amended.
	prescribed in terms of these Regulations, unless an		
	extension has been granted in terms of Regulation 3(7).		
	You are hereby reminded of Section 24F of the National		This comment is acknowledged, no activity will commence
	Environmental Management Act, Act No 107 of 1998, as		prior to an environmental authorization.
	amended, that no activity may commence prior to an		
	environmental authorisation being granted by the		
	Department.		
4.	The SARAO has the following comments on the	Mr Selaelo Matlhane Spectrum &	This comment is acknowledged, the applicant takes note of
	abovementioned amendment application:	Spectrum & Telecommunication	the requirement to ensure that radiated EMI from the project
	SARAO has conducted a high level risk assessment of the	Manager	will not exceed the stipulated threshold, and will cater for this
	proposed amendments to the above mentioned		during the final turbine selection and detailed design of the
	facility's Environmental Authorisation, in particular the	South African Radio	facility, in accordance with the SARAO's requirements and
	increase in hub height from 120m to 150m. 1. Based on this assessment, we do not foresee that this	Astronomy	the Astronomy Geographic Advantage Areas (AGAA) Regulations in force at the time of construction. SARAO will
	amendment will increase the risk of electromagnetic	Observatory (SARAO)	be kept informed of developments relating to the
	interference on the SKA Infrastructure Territory. We do	(SAKAO)	Gunstfontein WEF.
	however request that we are kept informed of the	Letter: 01-07-2019	Constrollicat Well.
	developments of the project and that control		
	measures are put in place to ensure that the total		
	radiated EMI from the facility does not exceed the		
	Tadiated Livil from the facility account of exceed fro		

NO.	COMMENT	RAISED BY	RESPONSE
	electric field strength of 78 dBµV/m when measured		
	10m from the facility in the direction of the SKA.		
	2. We wish you all the best with the project and our		
	office remains open for further engagement on this		
	matter.		
	3. SARAO conducted an assessment to determine		
	whether SKA Infrastructure territory will be influenced		
	by the proposed amendments. It was determined		
	that the increased in hub height does not significantly		
	decrease the pathloss between the wind energy		
	facility and the SKA Infrastructure Territory. The		
	pathloss between the facility and SKA133 at 120m		
	hub height is 174 dB while at the hub height of 150m,		
	the pathloss is 171 dB. Therefore, the increase in hub		
	height from 120m to 150m does not significantly		
	increase the risk of interference at the SKA. At this		
	pathloss, radiated emission from the facility should be		
	below 78 dBµV/m to comply with the Regulations.		

2. COMMENTS RECEIVED: Stakeholders and Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	LETTER OF OBJECTION REGARDING THE WIND TURBINES	David C Wootton	This comment (including the articles attached thereto) is
	UPGRADE AT	Landowner:	acknowledged.
	GUNSFONTEIN FARM SUTHERLAND N CAPE	Malieschoek / De	
	1. References to the Impact of Wind Farms on Avian	Kruis Farm	Pre-construction bird and bat monitoring was undertaken
	Species. Please see the following attached pdf files.		for the Gunstfontein Wind Energy Facility, this included
	The Internet has extensive Websites listing the	Letter: 25-06-2019	monitoring over the period of one year. As part of the
			current amendment, the Avifaunal and Bats specialists
			assessed the findings of the 12-months of monitoring as well

NO.	COMMENT	RAISED BY	RESPONSE
	problems and threats posed by wind farms to bird		as the conclusions of the EIA phase Avifaunal and Bats
	and bat populations.		Specialist studies to inform the assessment on the updated
	2. I am conducting with the help of the MCSA (Mountain		turbine specifications and layout of the Gunstfontein Wind
	Club of South Africa), and other interested parties an		Energy Facility.
	ongoing survey of Malieschoek/De Kruis Farm. This is		
	for "The Private Nature Reserve/Conservancy		The avifaunal and bat specialists undertook comprehensive
	Malieschoek".		literature reviews as part of the current amendment
	3. This is expected to take between 5 and 10 years		application, to ensure that the latest research, findings and
	minimum. And this is due to the enormous cyclical		best practices (regarding the interactions between birds/
	variations in the climate of the region.		bats and wind farm developments) were considered in the
	4. As I have mentioned in previous letters to your selves.		current assessment. The results of these literature reviews are
	Your impact study has only been superficially done		presented in the Avifaunal and Bats reports, included in
	and is incomplete.		Appendix A and B of the Final Motivation report.
	5. If you plan to change the original conditions of your		
	application. Then I feel that you have to do a full re-		The avifaunal and bat specialists considered the results of the 12-month monitoring undertaken as part of the original
	assessment of the impact of the new sizes (wind turbines) that you plan to use.		EIA, together with recent and up to date research on bird
	6. These larger turbines are working with huge		and bat populations, current guidelines and updated
	engineering forces. They do catch fire when the rotor		datasets when making the current assessments. The buffers
	brake fails. This also puts this very fragile environment		imposed on the updated layout were informed by recent
	at risk from being burnt out.		research of operational Wind Energy Facilities and the most
	7. I feel that, no matter what objections are put forward		recent guidelines and available datasets. This was done to
	regarding this project. It is going to go ahead. All the		ensure a thorough assessment of the proposed
	effort that we have put into this wonderful place to		amendments, and to ensure the facility has minimal impacts
	preserve it for all future South Africans. Is now being		on bird and bat populations.
	put at serious risk? And this makes me sad.		' '
			Additional mitigation measures were provided as part of the
			Avifaunal and Bats report and this was included in the
			updated EMPr of the Gunstfontein Wind Energy facility.

NO.	COMMENT	RAISED BY	RESPONSE
			In terms of fire risk: note that fire incidents associated with wind turbines have historically been very rare globally, and the risk of fire is greatly mitigated in modern turbines by the use of fire retardant materials and other design features. In addition, all operational turbines will be monitored 24 hours a day by an advanced SCADA monitoring system which allows for the early detection of any potential mechanical faults so that these can be tended to swiftly, before failure. In addition, the operations management staff will be properly trained in fire mitigation and fire response techniques.