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**NAMAS WIND FARM, NORTHERN CAPE PROVINCE  
COMMENTS AND RESPONSES REPORT**

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**COMMENTS RECEIVED PRIOR TO THE 30-DAY REVIEW PERIOD OF THE BASIC ASSESSMENT REPORT**

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>No issues are foreseen with the development of the Namas Wind Farm. The developers and Eskom will just need to conclude on the issues of the roads within the area that belong to Eskom, which are proposed to be used for the developments. Eskom has confirmed that access for the use of these roads will not be denied.</p> <p>Eskom has a property next to the project site which is also earmarked for the development of a wind energy facility. The rest of the Eskom properties might be used for the future development of solar energy, however no application for Environmental authorisation has been lodged.</p> <p>The three farm houses that are located along the road within and near the Namas Wind Farm project site are unoccupied, with occasional occupation, about once a year, by farm labourers.</p>	<p>Gert Greeff</p> <p>Eskom Land Management Manager (adjacent landowner)</p> <p>Focus Group Meeting: 18-07-2018</p>	<p>It is noted that Eskom do not foresee any issues with the development of the Namas Wind Farm within the project site. Further consultation between the developer and Eskom will be undertaken to finalise the use of the roads within the area that belong to Eskom for the construction and operation of the Namas wind Farm.</p> <p>It is noted that Eskom is proposing the development of the Eskom Kleinsee Wind Farm, which is authorised and will have a capacity of 300MW and that solar energy facilities might be developed in future.</p> <p>The intermittent use of the farm houses located along the road is noted.</p>
2.	<p>Is a full Avifaunal Impact Assessment being undertaken as part of the shortened timeframe of the BA process considering the location of the projects within a REDZ?</p> <p>The size of the Secretarybird buffer identified within the project site will need to be discussed further. There have not been a lot of Secretarybird collisions, but it is a threatened species so care must be taken in this regard. We are still in the process of developing the science to get a better understanding of the buffer sizes for the birds. Rob Simmons will have to provide a basis and justification for why a 1km buffer has been applied for the Secretarybird nest on the Namas Wind Farm project site. We have some tracking data for Secretarybirds which have been analysed to understand how far the birds move from their nests during the critical times. A 1km buffer</p>	<p>Samantha Ralston-Paton</p> <p>BirdLife South Africa</p> <p>Focus Group Meeting: 18-07-2018</p>	<p>Yes, a 12-month monitoring programme has been undertaken and completed for birds in line with the best-practice guidelines of BirdLife, and a full impact assessment to assess the impacts on birds within the project site has been included as part of the BA report as Appendix E, which will be made available for comment and review.</p> <p>The concern regarding the size of the Secretarybird nest buffer on the Namas Wind Farm project site has been addressed as part of the Avifauna Impact Assessment (Appendix E). A justification for the size of the buffer has been included in the Avifauna Impact Assessment.</p> <p>Following the meeting with BirdLife a follow-up technical meeting was held on 14 August 2018 to further discuss the buffers of the Secretarybird nest recommended by the</p>

	<p>around the Secretarybird nests will be too little, this will have to be considered further by the specialist.</p>		<p>specialist and the justification for the size of the recommended buffers. Following this meeting and further correspondence between the specialist and BirdLife the size of the buffer was accepted (Appendix E of the BA report).</p>
	<p>How do the developers feel about the mitigation recommended by the avifaunal specialist to paint one blade of the wind turbines black? Is that something the developer will be happy to experiment with? An experiment in Norway has shown very promising results with the implementation of this mitigation measure. Birdlife would like to see this measure tested more, however the challenges related to this measure are recognised.</p>		<p>It is dependent on whether the Civil Aviation Authority (CAA) will accept this and whether the Original Equipment Manufacturers (turbines suppliers) will be able to cater for this change. The developers are not averse to this mitigation measure.</p>
	<p>The Namas Wind Farm project site is located south of a very localised lark, called Barlow's Lark, found near Port Nolloth. It is not a threatened species, but it has a localised range. It will not be a red-flag to development as it is not threatened. However, the distance between the lowest blade tip and the ground will need to be considered to ensure that the species does not get hit.</p>		<p>The Avifauna Impact Assessment (Appendix E) did not identify the Barlow's Lark as a species for concern with the development of the Namas Wind Farm.</p>
	<p>What has recently come to light is that some wind farms are constructing their internal reticulation lines between the turbines above-ground as these do not trigger a listed activity. But within an environment like this it would be preferred to have the lines placed below-ground due to the Bustard collision risk.</p>		<p>The internal reticulation lines of the Namas Wind Farm will be constructed underground.</p>
<p>3.</p>	<p>As the nest located in the Namas Wind Farm project site is not active, this is encouraging. The question will remain what if this situation changes, what can be done to safeguard the birds until more answers become available?</p>	<p>Samantha Ralston-Paton BirdLife South Africa  Focus Group Meeting: 14-08-2018</p>	<p>One key mitigation for the area is to remove all roads from use within the recommended 1km buffer applied around the nest, as well as the removal all fences in these areas. There is no record of breeding on the site, and no current breeding activity. The nests are inactive, and a second bird was only briefly observed on one occasion.</p>
	<p>BirdLife SA is satisfied with the 1km buffer proposed for the Secretarybirds nest considering the justification provided by Rob Simmons. What management measures can be included into the Environmental Management Programme (EMPr) as long-term</p>		<p>The recommendation for long-term monitoring during the operation phase has been included in the Avifauna Impact Assessment Report (Appendix E). A change in activity during the operation phase monitoring must be noted and appropriate mitigation recommended in this event.</p>

	<p>management or mitigation measures? The nest site should be monitored continually for any breeding activity.</p> <p>Should the nest become an active breeding site, it may be necessary to consider shut down on demand during high risk periods</p>		<p>The potential for risk to a provisioning male during the breeding period (that is, when bringing food back to the nest, the bird will soar/glide into the nest area) is acknowledged, and this risk can also impact the survival rates in juveniles. Appropriate mitigation will be recommended by a suitability qualified specialist should this event occur.</p>
4.	<p>I spoke to Lisa who suggest that I register on your database regarding the Zonnequa and Namas Wind farms.</p> <p>Can you please assist in registering?</p>	<p>Deon Fontini Martin &amp; East Email: 15-08-2018</p>	<p>Mr. Deon Fontini has been registered as an I&amp;AP on the Namas Wind Farm project database.</p>
5.	<p>Kindly register me as an I&amp;AP for the EIA for the Namas and Zonnequa Wind Farms.</p> <p>Also kindly share the password to access the BA report.</p>	<p>Ravisha Ajodhapersadh Business Development Enel Green Power Email: 29-08-2018</p>	<p>Ms. Ravisha Ajodhapersadh has been registered as an I&amp;AP on the Namas Wind Farm project database.</p> <p>The I&amp;AP was advised that the Basic Assessment (BA) report is not available for review at this stage of the process and that a notification of the availability of the BA report, the timeframe of the review period and the locations of the report (including the Savannah Environmental website) will be distributed. The password to access the report once uploaded, was provided to the I&amp;AP.</p>
6.	<p>I am interested in the project and progress of it. I am the owner of Zonnekwa 326 and a portion of 328. Will appreciate if I can receive information.</p>	<p>JB van Dyk Landowner of the farms Zonnekwa 326 and a portion of 328 Email: 3-09-2018</p>	<p>The interest of the I&amp;AP as an adjacent landowner is noted.</p> <p>Ms. JB van Dyk has been registered as an I&amp;AP on the Namas Wind Farm project database and will receive all information and notifications relating to the project and the BA process.</p>

7.	<p>Can you perhaps give me more information in terms of when the proposed start date of the project is, how many people are going to work by the project and what is the proposed timeframes of the project.</p> <p>Where can one register if you own accommodation? I own 32 Rooms (Hostel te Kleinsee).</p>	<p>Koos Bisschoff I&amp;AP  Email: 10-09-2018</p>	<p>The interest of the I&amp;AP as a business owner in Kleinsee is noted.</p> <p>Mr. Koos Bisschoff has been registered as an I&amp;AP on the Namas Wind Farm project database.</p> <p>As the BA process to obtain Environmental Authorisation is still underway it is not possible to provide a timeframe on the construction and operation of the Namas Wind Farm.</p> <p>Employment opportunities will be made available during both the construction and operation phases of the Namas Wind Farm. Up to 400 job opportunities will be created and maintained for the 24 month construction phase. During the operation phase up to 30 full-time employment opportunities will be available.</p>
8.	<p>Would like to obtain more information on this project and what procedure to follow to register.</p>	<p>Anton Bodenstein Registered Lifting Machine Inspector at ECSA: Inspection and Load Testing of Lifting Tackle and Lifting Machinery.  Namaqua Lifting Equipment  Email: 11-09-2018</p>	<p>Mr. Anton Bodenstein has been registered as an I&amp;AP on the Namas Wind Farm project database.</p> <p>A background information document (BID) containing project related information was distributed to the I&amp;AP for his consideration on 14 September 2018 via email.</p>