

Map 11 Visual sensitivity map of the properties hosting the proposed electrical infrastructure.

2101



Map 12 Map showing various renewable energy projects in the region surrounding the Rietrug electrical infrastructure project. The map shows the properties on which the projects will be developed and not the footprints of the proposed developments.

BASIC ASSESSMENT REPORT

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure)

APPENDIX D.4: Heritage Impact Assessment (Archaeology, Palaeontology and Cultural Landscape)

HERITAGE IMPACT ASSESSMENT: PROPOSED CONSTRUCTION OF A SUBSTATION AND 132 KV DISTRIBUTION LINE TO SUPPORT THE PROPOSED RIETRUG WEF, SUTHERLAND AND LAINGSBURG MAGISTERIAL DISTRICTS, NORTHERN AND WESTERN CAPE

SAHRA Case ID: 10494 HWC Case No.: 17020607AS0207E

Required under Section 38 (8) of the National Heritage Resources Act (No. 25 of 1999).

Report for:

CSIR – Environmental Management Services P.O. Box 320, Stellenbosch, 7599 Tel: 031 242 2318 Email: RAbed@csir.co.za

On behalf of:

South Africa Mainstream Renewable Power Developments (Pty) Ltd



Dr Jayson Orton ASHA Consulting (Pty) Ltd 6A Scarborough Road, Muizenberg, 7945 Tel: (021) 788 8425 | 083 272 3225 Email: jayson@asha-consulting.co.za

> 1st draft: 24 March 2017 Final report: 21 May 2017

Specialist declaration

I, Jayson Orton, as the appointed independent specialist, in terms of the 2014 EIA Regulations, hereby declare that I:

- I act as the independent specialist in this application;
- I perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct, and do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I have no vested interest in the proposed activity proceeding;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I have ensured that information containing all relevant facts in respect of the specialist input/study
 was distributed or made available to interested and affected parties and the public and that
 participation by interested and affected parties was facilitated in such a manner that all interested
 and affected parties were provided with a reasonable opportunity to participate and to provide
 comments on the specialist input/study;
- I have ensured that the comments of all interested and affected parties on the specialist input/study were considered, recorded and submitted to the competent authority in respect of the application;
- all the particulars furnished by me in this specialist input/study are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Name of Specialist:	JAYSON ORTON
	The second secon
Signature of the spec	cialist:
	A
Date: <u>24</u>	MARCH 2017

EXECUTIVE SUMMARY

1. Site Name

Electrical grid infrastructure to support the proposed Rietrug Wind Energy Facility (WEF)

2. Location

The proposed power line would traverse the following properties (listed from west to east as for Alternative 2):

- Northern Cape: Remaining Extent of Beeren Valley 150, Remaining Extent of Nooitgedacht 148, Remaining Extent of Hartbeesfontein 147, Portion 1 and Remaining Extent of Farm 219; and
- Western Cape: Farm 280, Portion 1 of Rheebokkfontein 4, Portion 2 of Rheebokkfontein 4, Portion 2 of De Molen 5, Portion 6 of Hamelkraal 16, and Portion 7 of Hamelkraal 16.

The proposed distribution line would run from an on-site substation at S32° 37′ 16″ E20° 54′ 30″ to one of two proposed third party substations (i.e. the proposed collector hub and Eskom Nuwerust Substation) to the east, neither of which are part of the present assessment. The easternmost substation would be located at S32° 42′ 00″ E21° 15′ 32″. There are two alternatives of the third party substation and associated distribution line routing, with the first being confined to Northern Cape and the second extending further east into Western Cape.



3. Locality Plan

Map showing the location of the study area. Alternative 1 is shown in pink, while Alternative 2 follows the same alignment but extends along the green line to the east.

4. Description of Proposed Development

It is proposed to construct the following:

- An on-site substation in Northern Cape with an operations and maintenance building and a laydown area;
- A 132 kV distribution line extending from the on-site substation to a third party substation in Northern Cape (Alternative 1; about 17 km long) or Western Cape (Alternative 2, about 44 km long);
- A connection to the relevant third party substation; and
- A service road below the power line (the road deviates from the power line in one short section of Alternative 2).

It should be noted that there are three separate power line applications being conducted simultaneously. Should all three be approved and receive preferred bidder status then it is proposed to link them to one another as follows: a single line would be constructed from each of the proposed Sutherland 2 WEF and Rietrug WEF Substations to the proposed Sutherland WEF Substation with only a single line being constructed from the Sutherland WEF substation on to either of the Alternative 1 or 2 termini. Both alternatives for all three projects end at the same point in the east (the yellow and orange substations in Figure 1) but start in different places in the west.

5. Heritage Resources Identified

Archaeological remains are generally scarce but are found throughout the area. Very little Stone Age material was found with just two 'sites' being recorded: a kraal complex and a geometric rock art site. Isolated stone artefacts were remarkably rare. The vast majority of archaeological remains found were historical and ranged from a ruined farm complex to small, isolated ruined structures and isolated individual artefacts. Alternative 2 has more significant sites in close proximity to it but, because the alignment was devised by the present author to avoid these sites, significant impacts are not expected.

Although palaeontological resources were found throughout much of the study area, the vast majority were of very limited significance. Two important fossil sites were found but both were located away from the proposed power line footprint and impacts are not expected.

Some graveyards and buildings are present in the area but are located well away from the proposed power line alignments and no impacts are expected.

The rural cultural landscape extends throughout the study area but, aside from fences and farm tracks, human interventions are generally very sparse. The site lies within a proposed Renewable Energy Development Zone (REDZ) and it is noted that a new electrical layer is due to be added to this landscape in the very near future.

6. Anticipated Impacts on Heritage Resources

Both Alternative 1 and Alternative 2 have heritage sites within a few hundred metres of their alignments but direct impacts are not expected. However, a potentially sensitive part of Alternative 2 could not be surveyed in the field. No heritage resources were found to lie directly

within the proposed development footprint. It is noted that the Stone Age kraal complex is bisected by an access road that might be used during development. The greater landscape, especially along the escarpment, is visually significant but because it lies within a proposed REDZ the area is very likely to be devoted to renewable energy developments (some facilities are already scheduled for construction in 2017) and the proposed electrical grid infrastructure would thus not be out of place.

7. **Recommendations**

Because there are unlikely to be significant impacts to heritage resources it is recommended that the proposed development be authorised. However, the following conditions should be incorporated into the Environmental Authorisation:

- Any areas not yet surveyed should be examined by both an archaeologist and a palaeontologist in order to identify any areas or sites that should be protected or mitigated prior to commencement of construction (this includes parts of the assessed alignments or any alterations made after completion of this report);
- The Environmental Control Officer (ECO should be aware of the potential for fossils to be uncovered during excavations. As many excavations as possible should be monitored by the ECO during construction and if any fossils are uncovered they should be protected *in situ* and immediately reported to a palaeontologist in order to plan a way forward;
- The farm road passing through the kraal complex may not be widened towards the east and should preferably not be widened at all;
- Significant palaeontological and archaeological sites as listed in this report should be identified on project maps and regarded as no-go zones with buffers of at least 30 m around all associated features (the exception is the service road diversion which comes within 20 m of the rock art site but uses an existing farm track);
- These no-go sites should be examined periodically by the ECO during the construction phase to ensure that they are being respected; and
- If any archaeological material, palaeontological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist or palaeontologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

8. Author/s and Date

<u>Heritage Impact Assessment</u>: Dr Jayson Orton, ASHA Consulting (Pty) Ltd, 21 May 2017 <u>Archaeological specialist study</u>: Dr Jayson Orton, ASHA Consulting (Pty) Ltd, 21 May 2017 <u>Palaeontological specialist study</u>: Dr John Almond, Natura Viva cc, May 2017

Glossary

Background scatter: Artefacts whose spatial position is conditioned more by natural forces than by human agency

Kraal: Afrikaans word for a livestock enclosure. The Afrikaans is popularly used throughout the area.

Lammerkraal: A small enclosure, often alongside or adjoining a larger one, in which lambs were penned separately from the adult sheep.

Later Stone Age: Period of the Stone Age extending over the last approximately 20 000 years.

Muurkas: Wall cupboard. A depression in the wall which would typically have a wooden box inside it with doors on the front.

Trapvloer: Threshing floor. Circular 'floor' lined with stones for threshing wheat.

Waterput: A hole excavated into the ground, often into rock, that functioned as a well.

Abbreviations

APHP: Association of Professional Heritage Practitioners

ASAPA: Association of Southern African Professional Archaeologists

BAR: Basic Assessment Report

CSIR: Council for Scientific and Industrial Research

CRM: Cultural Resources Management

DEA: National Department of Environmental Affairs

ECO: Environmental Control Officer

GPS: global positioning system

HIA: Heritage Impact Assessment

HWC: Heritage Western Cape

I&APs: interested and affected parties.

LSA: Later Stone Age

NEMA: National Environmental Management Act (No. 107 of 1998)

NHRA: National Heritage Resources Act (No. 25 of 1999)

NID: Notification of Intent to Develop

PPP: Public Participation Process

REDZ: Renewable Energy Development Zone

SAHRA: South African Heritage Resources Agency

SAHRIS: South African Heritage Resources Information System

WEF: Wind Energy Facility

Compliance with Appendix 6 of the 2014 EIA Regulations

Requirements of Appendix 6 – GN R326 (7 April 2017)	Addressed in the
	Specialist Report
 (1) A specialist report prepared in terms of these Regulations must contain- a) details of- 	Section 1.4 Appendix 1
i the specialist who prepared the report: and	
ii the expertise of that specialist to compile a specialist report including a	
curriculum vitae:	
b) a declaration that the specialist is independent in a form as may be specified by	Page ji (Preliminary
the competent authority:	Section of this
	report)
c) an indication of the scope of, and the purpose for which, the report was	Section 1.3
prepared;	
(cA) an indication of the quality and age of base data used for the specialist report;	Section 3
(cB) a description of existing impacts on the site, cumulative impacts of the proposed	Sections 4, 5, 6 and 7
development and levels of acceptable change;	
d) the duration, date and season of the site investigation and the relevance of the	Section 3.2
season to the outcome of the assessment;	
e) a description of the methodology adopted in preparing the report or carrying out	Section 3
the specialised process inclusive of equipment and modelling used;	
f) details of an assessment of the specific identified sensitivity of the site related to	Section 1.1.1, and
the proposed activity or activities and its associated structures and infrastructure,	Sections 3.2
inclusive of a site plan identifying alternatives;	
g) an identification of any areas to be avoided, including buffers;	Section 9
h) a map superimposing the activity including the associated structures and	Section 9
infrastructure on the environmental sensitivities of the site including areas to be	
avoided, including buffers;	
i) a description of any assumptions made and any uncertainties or gaps in	Section 3.5
i) a description of the findings and notential implications of such findings on the	Soction 6
impact of the proposed activity or activities:	Section o
k) any mitigation measures for inclusion in the FMPr:	Section 9
 any conditions for inclusion in the environmental authorisation: 	Section 13
m) any monitoring requirements for inclusion in the EMPr or environmental	Section 9
authorisation;	
n) a reasoned opinion-	Section 12 and 13
i. whether the proposed activity, activities or portions thereof should be	
authorised;	
(iA) regarding the acceptability of the proposed activity and activities; and	
ii. if the opinion is that the proposed activity, activities or portions thereof	
should be authorised, any avoidance, management and mitigation	
measures that should be included in the EMPr, and where applicable,	
the closure plan;	
o) a description of any consultation process that was undertaken during the course	Section 11
of preparing the specialist report;	
p) a summary and copies of any comments received during any consultation	Section 11
process and where applicable all responses thereto; and	Appendix 4
q) any other information requested by the competent authority.	n/a
2. Where a government notice gazetted by the Minister provides for any protocol of	Not Applicable
minimum information requirement to be applied to a specialist report, the requirements	
as indicated in such notice will apply	

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1. INTRODUCTION

ASHA Consulting (Pty) Ltd was appointed by the Council for Scientific and Industrial Research (CSIR) to conduct an assessment of the potential impacts to heritage resources that might occur through the proposed construction of an on-site substation and electrical distribution line (and associated infrastructure) to support the proposed Rietrug Wind Energy Facility (WEF). The distribution line would run from a proposed on-site substation at S32° 37′ 16″ E20° 54′ 30″ to one of two proposed third party substations to the east (i.e. the proposed collector hub or Eskom Nuwerust Substation), neither of which are part of the present assessment. The easternmost third party substation would be located at S32° 42′ 00″ E21° 15′ 32″. There are two alternatives of the third party substation and associated distribution line routing, with the first being confined to Northern Cape and the second extending further east into Western Cape (Figure 1).



Figure 1: Map showing the location of the study area. The blue square shows the proposed Rietrug on-site substation, while the pink line indicates the Alternative 1 distribution line route. The extension eastwards along the green line is Alternative 2. The yellow and orange squares respectively represent the Suurplaat and Nuwerust substation sites already examined in other impact assessments.

From west to east, the proposed power line would traverse the following properties:

- Northern Cape
 - Remaining Extent of Beeren Valley 150
 - Remaining Extent of Nooitgedacht 148
 - Remaining Extent of Hartbeesfontein 147
 - Portion 1 and Remaining Extent of Farm 219
- Western Cape
 - o Farm 280

- o Portion 1 of Rheebokkfontein 4
- Portion 2 of Rheebokkfontein 4
- o Portion 2 of De Molen 5
- Portion 6 of Hamelkraal 16
- Portion 7 of Hamelkraal 16

The above farm portions apply to the proposed Alternative 2 routing of the distribution line and connection to the proposed Nuwerust Substation. Alternative 1 of the proposed distribution line will only be routed over the Remaining Extent of Beeren Valley 150, Remaining Extent of Nooitgedacht 148, and Remaining Extent of Hartbeesfontein 147, within the Northern Cape.

1.1. Project description

It is proposed to construct the following:

- An on-site substation in Northern Cape with an operations and maintenance building and a laydown area;
- A 132 kV distribution line extending from the on-site substation to a third party substation in Northern Cape (Alternative 1; about 17 km long) or Western Cape (Alternative 2, about 44 km long);
- A connection to the relevant third party substation; and
- A service road below the power line (the road deviates from the power line in one short section of Alternative 2).

It should be noted that there are three separate Electrical Grid Infrastructure applications being conducted simultaneously. Should all three be approved and receive preferred bidder status then it is proposed to link them to one another as follows: a single line would be constructed from each of the proposed Sutherland 2 WEF and Rietrug WEF Substations to the proposed Sutherland WEF Substation with only a single line being constructed from the Sutherland WEF substation on to either of the Alternative 1 or 2 termini. Both alternatives for all three projects end at the same point in the east (the yellow and orange substations in Figure 1) but start in different places in the west.

1.1.1. Aspects of the project relevant to the heritage study

All aspects of the proposed development are relevant, since excavations for foundations may impact on archaeological and/or palaeontological remains, while the above-ground aspects create potential visual (contextual) impacts to the cultural landscape and any significant heritage sites that might be visually sensitive.

1.2. Terms of reference

ASHA Consulting was asked to submit a Notification of Intent to Develop (NID) form to Heritage Western Cape (HWC) and compile a Heritage Impact Assessment (HIA) that would meet the requirements of the relevant heritage authorities in both Northern Cape and Western Cape.

On notifying the South African Heritage Resources Agency (SAHRA) of the proposed development, they requested an HIA that included archaeological and palaeontological studies. HWC responded to the NID with a request for an HIA that included specialist assessments of archaeological and palaeontological resources as follows:

You are hereby notified that, since there is reason to believe that the proposed development will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of section 38(3) of the NHRA be submitted. This HIA must have specific reference to the following:

- Impacts to archaeological heritage resources
 - Impacts to palaeontological heritage resources.

The required HIA must have an integrated set of recommendations.

The comments of relevant registered conservation bodies and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.

It should also be noted, however, that following Section 38(3) of the National Heritage Resources Act (No. 25 of 1999), even though certain specialist studies may be specifically requested, <u>all</u> heritage resources should be identified and assessed.

1.3. Scope and purpose of the report

An HIA is a means of identifying any significant heritage resources before development begins so that these can be managed in such a way as to allow the development to proceed (if appropriate) without undue impacts to the fragile heritage of South Africa. This HIA report aims to fulfil the requirements of the heritage authorities such that a comment can be issued for consideration by the National Department of Environmental Affairs (DEA) who will review the Basic Assessment Report (BAR) and grant or withhold authorisation. The HIA report will outline any management and/or mitigation requirements that will need to be complied with from a heritage point of view and that should be included in the conditions of authorisation should this be granted.

1.4. The author

Dr Jayson Orton has an MA (UCT, 2004) and a D.Phil (Oxford, UK, 2013), both in archaeology, and has been conducting HIAs and archaeological specialist studies in the Western Cape and Northern Cape provinces of South Africa since 2004 (Please see curriculum vitae included as Appendix 1). He has also conducted research on aspects of the Later Stone Age in these provinces and published widely on the topic. He is an accredited heritage practitioner with the Association of Professional Heritage Practitioners (APHP) and also holds archaeological accreditation with the Association of Southern African Professional Archaeologists (ASAPA) CRM section (Member #233) as follows:

- Principal Investigator: Stone Age, Shell Middens & Grave Relocation; and
- Field Director: Colonial Period & Rock Art.

2. HERITAGE LEGISLATION

The National Heritage Resources Act (NHRA) No. 25 of 1999 protects a variety of heritage resources as follows:

- Section 34: structures older than 60 years;
- Section 35: palaeontological, prehistoric and historical material (including ruins) more than 100 years old;

- Section 36: graves and human remains older than 60 years and located outside of a formal cemetery administered by a local authority; and
- Section 37: public monuments and memorials.

Following Section 2, the definitions applicable to the above protections are as follows:

- Structures: "any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith";
- Palaeontological material: "any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace";
- Archaeological material: a) "material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures"; b) "rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation"; c) "wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic, as defined respectively in sections 3, 4 and 6 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation"; and d) "features, structures and artefacts associated with military history which are older than 75 years and the sites on which they are found";
- Grave: "means a place of interment and includes the contents, headstone or other marker of such a place and any other structure on or associated with such place"; and
- Public monuments and memorials: "all monuments and memorials a) "erected on land belonging to any branch of central, provincial or local government, or on land belonging to any organisation funded by or established in terms of the legislation of such a branch of government"; or b) "which were paid for by public subscription, government funds, or a public-spirited or military organisation, and are on land belonging to any private individual."

While landscapes with cultural significance do not have a dedicated Section in the NHRA, they are protected under the definition of the National Estate (Section 3). Section 3(2)(c) and (d) list "historical settlements and townscapes" and "landscapes and natural features of cultural significance" as part of the National Estate. Furthermore, Section 3(3) describes the reasons a place or object may have cultural heritage value; some of these speak directly to cultural landscapes.

Section 38 (2a) states that if there is reason to believe that heritage resources will be affected then an impact assessment report must be submitted. This report fulfils that requirement.

Under the National Environmental Management Act (No. 107 of 1998; NEMA), as amended, the project is subject to a BAR. HWC (for all heritage in Western Cape), Ngwao-Boswa Ya Kapa Bokoni (NBKB) (Heritage Northern Cape; for built environment and cultural landscapes in Northern Cape) and the SAHRA (for archaeology and palaeontology in Northern Cape) are required to provide comment on the proposed project in order to facilitate final decision making by the DEA.

3. METHODS

3.1. Literature survey and information sources

A survey of available literature was carried out to assess the general heritage context into which the proposed development would be set. This literature included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS). The 1:250 000 map sourced from the Chief Directorate: National Geo-Spatial Information was also used.

3.2. Field survey

Five days were spent on site examining the alignments of four related projects in Northern Cape from 14 to 18 November 2016. This was in early summer but in this relatively dry and high altitude environment the season makes little difference to the degree of vegetation cover and hence the visibility of heritage resources. During this survey the majority of the Alternative 1 alignment was walked. Because Alternative 2 was only introduced for assessment after this fieldwork had been completed, a second trip of two days was carried out during which the eastern part of the Alternative 2 study area in Western Cape was surveyed. This was in mid-summer but, again, season made no difference. During the survey the positions of finds were recorded on a hand-held GPS receiver set to the WGS84 datum. Track paths were also recorded on the GPS (Figure 2). Photographs were taken at times in order to capture representative samples of both the affected heritage and the landscape setting of the proposed development.



Figure 2: Aerial view of the study area showing the proposed alignments (Alternative 1 in yellow, Alternative 2 in pink) and walk and drivepaths (green lines). Note that Alternative 1 was surveyed completely but the tracks are obscured by the power line alignments. The central portion of Alternative 2 was not surveyed.

3.3. Impact assessment

For consistency, the impact assessment was conducted through application of a scale supplied by the CSIR.

3.4. Grading

Section 7 of the NHRA provides for the grading of heritage resources into those of National (Grade 1), Provincial (Grade 2) and Local (Grade 3) significance. Grading is intended to allow for the identification of the appropriate level of management for any given heritage resource. Grade 1 and 2 resources are intended to be managed by the national and provincial heritage resources authorities, while Grade 3 resources would be managed by the relevant local planning authority. These bodies are responsible for grading, but anyone may make recommendations for grading.

It is intended that the various provincial authorities formulate a system for the further detailed grading of heritage resources of local significance but this is generally yet to happen. HWC (2012), however, uses a system in which resources of local significance are divided into Grade 3A, 3B and 3C. These approximately equate to high, medium and low local significance, while sites of very low or no significance (and generally not requiring mitigation or other interventions) are referred to as Not Conservation Worthy (NCW).

NBKB has no grading system in place but SAHRA (2007) has formulated its own system¹ for use in provinces where it has commenting authority. In this system sites of high local significance are given Grade IIIA (with the implication that site should be preserved in its entirety) and Grade IIIB (with the implication that part of the site could be mitigated and part preserved as appropriate) while sites of lesser significance are referred to as having 'General Protection' and rated with an A (high/medium significance, requires mitigation), B (medium significance, requires recording) or C (low significance, requires no further action).

3.5. Assumptions and limitations

The study is carried out at the surface only and hence any completely buried archaeological sites or palaeontological occurrences will not be readily located. Similarly, it is not always possible to determine the depth of archaeological material visible at the surface. Generally, however, archaeological material in the Karoo tends to be restricted largely to the surface.

For various reasons some sections of Alternative 2 were not examined in the field:

- A 4.3 km long section above the escarpment was not examined because it was topographically uninteresting and remote and aerial photography suggested that the likelihood of significant finds would be extremely low;
- A 12 km long section on and running down to the base of the escarpment could not be examined because the land owner did not provide consent for specialist site visits. Although much of this area is likely of very low sensitivity, the valley section may be more sensitive. This should not affect the outcome of the impact assessment because the eastern part of this route was designed by the present author based on an examination of aerial photography and the findings from the area that could be surveyed; and

¹ The system is intended for use on archaeological and palaeontological sites only.

• Two short sections of Alternative 2 in the far east were not examined because this alternative was proposed during the fieldwork and there was insufficient time to consider it fully. However, the amount of land seen, including two other proximate alternatives that were surveyed and screened out, gives a good general understanding of the heritage environment.

Cumulative impacts can be difficult to assess accurately because of uncertainties as to what may or may not be constructed. A map of renewable energy projects was made available for the purpose of cumulative assessment and it is assumed here that each will have associated power lines and substations.

3.6. Consultation processes undertaken

The NHRA requires consultation as part of an HIA but, since the present study falls within the context of an EIA which includes a public participation process (PPP), no dedicated consultation was undertaken as part of the HIA for the Northern Cape component of the project. Interested and affected parties (I&APs) would have the opportunity to provide comment on the heritage aspects of the project during the PPP.

However, in their response to the NID application, HWC did require comment from the relevant Western Cape municipality and the draft HIA was therefore submitted to the Laingsburg Municipality for comment. See Section 11 below.

4. PHYSICAL ENVIRONMENTAL CONTEXT

4.1. Site context

The site is located in a predominantly natural landscape, although pockets of land could better be described as rural where farming occurs. The entire region is used for livestock grazing, although one area to the west of the study area is a nature reserve. The study area lies within a proposed Renewable Energy Development Zone (REDZ) and many renewable energy facilities have been proposed in the area (Figure 3). Some are scheduled for construction during 2017.



Figure 3: Map of farm portions affected by proposed renewable energy facilities in the broader study area.

4.2. Site description

Because the areas above and below the escarpment are so different, they are described separately.

Atop the escarpment the study area is comprised of gently undulating hills. The vast majority is undeveloped land, but some small areas of agricultural land do occur (e.g. Figure 4). Although the terrain is often very rocky, the rocks tend to be flat (Figure 5). Small ridges do protrude in places though, especially along the north-facing slopes in the eastern part of the Alternative 1 study area (Figure 6). Vegetation cover is usually low but, because of the slightly higher rainfall on the escarpment, it is fairly continuously present. In the river valleys there is somewhat denser bush (Figure 7). Although the rock is largely quite solid sandstone, there are places where dark shale bands occur which are eroding heavily (Figure 8). These are generally present on slopes or on the sides of incised valleys.

The central part of the study area spanning the provincial boundary could not be accessed. However, it is noted that the proposed distribution line route runs down an exposed 6 km long ridgeline from the edge of the escarpment into a river valley and then on across the plains.



Figure 4: View towards the south over an agricultural field in the western part of the study area (1.6 km northeast of the proposed Rietrug on-site substation location).





Figure 5: Flat rock slabs in the central part of the Northern Cape section.

Figure 6: A low rocky ridge in the central part of the Northern Cape section.



Figure 7: View up a river valley in the central part of the Northern Cape section showing the denser bush in the actual stream bed.



Figure 8: Weathering and eroding shale band in the side of a small river channel near the eastern end of Alternative 1.

The easternmost part of the study area that lies within Western Cape was mildly undulating with very minor stream beds but was much less rocky than the escarpment area (Figure 9). Low scarps occurred in places with the largest of these being in the region of 20-25 m high (Figure 10). The bulk of the visible bedrock was highly weathered shale but the remains of more resistant rocks were often lying on the surface as gravel (Figure 11). In a few places there were small broken cliffs (1-3 m high). Fine gravel tended to be widespread on the surface.





Figure 9: View towards the south in the far eastern part of the study area. A small drainage line is marked by denser vegetation.

Figure 10: View towards the southeast from the top of a small rocky scarp with a river bed visible in the distance.



Figure 11: View towards the southwest along a low rocky ridge in the eastern part of the study area showing the dark-coloured weathering shale overlain by the remnants of more resistant pale orange-coloured sandstone.

5. HERITAGE CONTEXT

This section of the report contains the desktop study and establishes what is already known about heritage resources in the vicinity of the study area. What was found during the field survey as presented below may then be compared with what is already known in order to gain an improved understanding of the significance of the newly reported resources.

5.1. Archaeological aspects

Prior to the colonial incursion into the interior of southern Africa the Bushmen and, more recently, the Khoekhoen occupied the area. Very little archaeological research has been undertaken in the area, although a number of impact assessments have been carried out, especially in connection with proposed renewable energy facilities. Most surveys show that Stone Age material is generally quite sparse on the landscape, although scatters of Early (ESA), Middle (MSA) and Late Stone Age (LSA) material have been reported (Hart *et al.* 2010; Halkett & Webley 2011). Occasional small rock shelters are known from the area (e.g. Evans *et al.* (1985), Hart (2005), Orton & Halkett 2011)) with one having been excavated. This one yielded a typical LSA assemblage with small scrapers, thinwalled potsherds, ostrich eggshell beads and some *Nassarius kraussianus* beads. The latter are estuarine shells that must have been obtained from the coast.

A very important aspect of the pre-colonial archaeology of the area is the many stone-built *kraals* (livestock enclosures) that have been recorded in various areas. The vast majority are in the Seacow River valley to the east (Hart 1989; Sampson 1985, 2008), but an excellent example has also been reported from the southern edge of Sutherland (Hart 2005). This example was a complex of 13 interlocking enclosures. A number of other examples were found, largely on top of the escarpment, in an area to the south of the present study area. Some had stone artefacts, red burnished, thinwalled pottery, and ostrich egg shell associated with them. Stone Age *kraals* are important sites and are as yet poorly understood.

Along the dry river beds at the base of the escarpment Hart *et al.* (2010) also identified sites which they thought were large Khoekhoe encampments situated among the Kameeldoring trees in the bottom of valleys. The sites contained thin-walled, burnished pottery, stone features, stone artefacts, grinding surfaces and graves, some of which have broken grinding stones on them. Also evident were discreet ash middens and animal bone. Hart *et al.* (2010) noted colonial period artefacts (19th century glass and ceramics) on some of the sites, possibly indicating continuous use of the area by Khoekhoe herders into the colonial period.

Although geometric rock art has been mapped by researchers across large swathes of South Africa, there is a gap in the distribution surrounding the study area (Orton 2013; Russell 2012; Smith & Ouzman 2004). Nevertheless, geometric rock art has been documented in the area. One site lies along the subject road near its western end (Orton & Halkett 2011) and the others are some 23 km and 29 km south of the road, just below the escarpment edge (Halkett & Webley 2011). Two sites contain geometric paintings, while the third is not discernible but may be a human figure.

Historical archaeology abounds in the area with many ruined stone-built structures being present (e.g. Hart *et al.* 2010; Halkett & Webley 2011; Kaplan 2009). These often have artefactual material (broken ceramics and glass, metal items, etc) scattered about them. Occasionally a refuse midden is

found alongside an old farmstead. These middens are largely early 18th to late 19th century in age and reflect the material remains of domestic life on the early frontier farms.

5.2. Built environment and historical archaeology

Various types of built structures have been recorded in the area. Because many are ruined and in a state of disuse, they would generally fall into the category of archaeological resources rather than built environment heritage resources. The types of structures included here include:

- Various boundary markers, cairns and beacons (e.g. Hart *et al.* 2010; Orton & Halkett 2011). They may have been built when the original farm surveys took place in the 19th century;
- Military structures occur in places, most notably on Jakkalsvalley, the farm through which the subject road passes at its western end (Orton & Halkett 2011). Many of these are ruined and would technically be archaeological sites;
- Farm houses, outbuildings and farm workers dwellings occur widely, sometimes built from dressed stone; and
- Dry stone *kraals* and boundary walls.

Hart *et al.* (2010) and Halkett & Webley (2011) recorded numerous graveyards, generally associated with homesteads and with abandoned settlements. Ruins are quite numerous and range from ruined farm complexes to stock posts, historic kraals and boundary walls.

There are also many tracks which are likely to have their origins in the 19th century wagon routes between farms, although these are perhaps better regarded as elements of the cultural landscape.

5.3. Historical background

Schoeman (1986) has described the early settlement of the Roggeveld and Sutherland area from about 1750 onwards. The escarpment area, with its higher rainfall, was found to be good for small stock farming in summer but the extreme winter cold forced people down into the valleys and plains to the south. Initially, the European population remained small because many early loan farms were used merely as "stock posts" - the owners lived elsewhere and often had more than one loan farm. The early days of colonial settlement were conflict-ridden because indigenous groups, called "Boschiesman Hottentoten" (Khoekhoen and San/Bushmen) were unhappy about losing their traditional lands and attempted to force the Europeans to flee what can best be described as 'guerrilla warfare'. Livestock theft was rife and attacks on farmers and indigenous populations were commonplace. From the late 18th century commando groups (comprised of local farmers) were called up to attack the kraals of local Khoekhoe and Bushmen groups. Although they defended their positions with bow and arrow, the firearms of the framers generally resulted in many indigenes being killed (Schoeman 1986). These commandos were initiated in response to the so-called "Roggeveld Rebellion" of 1772 when many Khoekhoe labourers left their farms and banded together in response to a rumour that all Khoekhoen living in kraals would be killed (Penn 2005). They were defeated and the San and Khoekhoen were gradually driven northwards from the Roggeveld. By 1809 there was reported to have been only one Bushman kraal left in the area. Penn (2005:21) notes that "Without access to the resources on both sides of the escarpment, and the water of the escarpment itself, both pastoralists and hunter-gatherers were doomed; hence the desperate fighting of the 1770s, 1780s and 1790s. These were years of intense commando activity and Khoisan resistance."

The early 19th century saw an increase in permanent European settlement, although the farmers' main source of income was still small stock – wheat could only be grown with great difficulty in isolated and protected valleys and there was very little standing water and grazing suitable for cattle. The early settlers were responsible for the construction of the well-known stone corbeled houses on the Northern Cape (Kramer 2012). Three known corbeled houses occur between 8 km and 11 km from the proposed power line route.

Schoeman (1986) notes that during the early years of settlement in the Roggeveld, many of the Trekboers lived in grass huts or Matjies houses, or even in tents. The use of Matjies houses was reported as late as 1839. Attempts at constructing more permanent structures were inhibited by the lack of wood suitable for building. One technique that was often used to overcome this difficulty was to use drystone walling to half height and then construct a wooden framework to support a reed roof on top of it. These were tiny houses and were known as *Hartebeeshuise*. Sometimes they were made without the stone courses and looked like a tent made of vegetation. Examples were reported to the southwest of the study area below the escarpment by Almond (pers. comm. 2016 in Orton 2016).

During the South African War (a.k.a. Anglo-Boer War), the British forces built fortifications at a number of strategic passes through the Roggeveld. Two stone blockhouses guard a pass on the farm Gunsfontein (Discover Sutherland 2017). With the Boer leader Manie Maritz active in the Calvinia District, many young men from the Roggeveld joined the Boer cause. In 1901 there appear to have been some skirmishes in the vicinity of Skietfontein, a farm through which the Komsberg Pass runs.

6. FINDINGS OF THE HERITAGE STUDY

This section describes the heritage resources recorded in the study area during the course of the project. The finds are mapped in Appendix 2. Table 1 provides a comprehensive list of the survey findings, but only selected examples are discussed in the text that follows.

Table 1: List of heritage resources recorded during the field survey. Grades follow the system in use for each province as relevant. Note that the finds for the entire study area for all three projects are listed for the sake of completeness. Some sites are located quite far from the proposed alignments.

Waypoint	Co-ordinates	Description	Grade	Cultural significance
		NORTHERN CAPE		
501	S32 36 49.1 E20 44 51.2	Stone walling.		
502	S32 36 47.8 E20 44 52.9	Stone walling with a small enclosure built onto it.		
503	S32 36 47.0 E20 44 56.7	Stone walling.	GP A	Medium
504	S32 36 44.0 E20 45 01.0	Stone walling.	-	
505	S32 36 39.6 E20 45 03.6	Stone walling.		
506	S32 36 38.0 E20 45 02.9	Small cottage. No doubt older than 60 years originally but has been renovated.	GP B	Low-Medium
507	S32 36 29.6 E20 45 03.2	Stone walling.		
508	S32 36 28.1 E20 45 02.2	Stone walling.		
509	S32 36 23.8 E20 45 03.2	Very large round historical kraal on a slope up against a rock outcrop.	GP A	Medium
510	S32 36 28.9 E20 44 59.1	Stone walling.		
511	S32 36 22.0 E20 45 06.1	There are a variety of remnant stone features in	GP C	Low

Waypoint	Co-ordinates	Description	Grade	Cultural significance
		this area but too little left to tell what any of them were.		
512	S32 36 02.2 E20 45 09.2	Two small stone structures, one rectangular, the other very small and circular. Also a small dump of bone, blue and white glass, white ceramics and coarse porcelain.	GP B	Low-medium
513	S32 35 58.9 E20 45 13.5	Small stone feature built up against a free- standing boulder. There are glass and ceramic fragments scattered about, especially to the north.	GP B	Low-medium
514	S32 35 45.4 E20 45 29.1	Tiny stone feature of 1 m by 2 m on a small scarp edge.	GP C	Very low
515	S32 34 53.2 E20 47 13.7	Isolated grooved lower grindstone found face up on the alluvial flood plain of a river.		
516	S32 34 38.2 E20 48 26.5	Very ephemeral stone enclosure of about 7 m by 10 m. There is doubt as to whether it is anthropogenic or natural.	GP C	Very low
517	S32 34 40.5 E20 47 45.5	Isolated white refined earthenware fragment.		
518	S32 34 47.4 E20 47 20.7	Large stone boundary cairn. Located alongside the current boundary fence.	GP A	Medium
519	S32 36 10.7 E20 45 11.2	Isolated old tin can. Manufacturer named as "Poulton & Noel". A record in the Evanion Catalogue (n.d.) shows the company to have been a manufacturer of preserved foods during the 1880s.		
566	S32 36 27.1 E20 45 13.1	Stone walling against rock outcrop. Likely historical.	GP C	Low
567	S32 36 26.5 E20 45 13.8	Stone walling against rock outcrop. Likely historical.	GP C	Low
568	S32 36 26.7 E20 45 13.4	Stone walling against rock outcrop. Likely historical.	GP C	Low
569	S32 34 44.2 E20 53 17.4	Stone 'cairn'. Not neatly made but just a pile of stones.	GP C	Low
570	S32 34 15.3 E20 50 51.8	Extensive scatter of ostrich eggshell on the edge of a flat-topped koppie.	GP C	Low
571	S32 34 15.2 E20 50 50.5	Smaller scatter of ostrich eggshell on the edge of a flat-topped koppie.	GP C	Low
572	S32 34 15.0 E20 50 49.9	Isolated old tin.		
573	S32 36 04.0 E20 54 19.4	Graveyard in the middle of agricultural lands. May not have been recorded by Halkett and Webley (2010). It is located well away from the proposed power line but is close to a current farm road.	III A	High
520	S32 36 06.2 E20 44 54.3	Large stone cairn located about 20 m from the road.	GP B	Low-Medium
521	S32 38 23.2 E20 58 16.5	Small round stone structure overlooking a dam on high ground near the edge of the escarpment.	GP B	Low-Medium
522	S32 38 24.1 E20 58 16.4	Small rectangular stone structure overlooking a dam on high ground near the edge of the escarpment. There is also a small oven alongside it.	GP B	Low-Medium
523	S32 38 06.3 E21 01 02.4	Half an isolated lower grindstone found face up alongside a small tributary stream above a larger stream bed.		
524	S32 38 10.1 E21 01 03.7	Small stone structure in a small, steep-sided river valley. Almost certainly a shepherd's hut. More intact than many other historical finds.	GP A	Medium

Waypoint	Co-ordinates	Description	Grade	Cultural significance
525	S32 38 24.3 E21 02 37.4	Two historical kraals, one rectangular and one circular.	GP B	Low-Medium
526	S32 38 37.3 E21 03 06.4	Tiny stone feature on a rocky ridge. Also a stone beacon (just a few stones on a boulder) nearby.	GP C	Low
527	S32 38 22.5 E21 02 28.7	Stone house ruin. The occupants had at some point tried to rescue the walls from caving in by building extra walling up on the outside. The inside has also started bulging and no doubt this lead to the people moving out and removing all wooden joinery for use elsewhere.	GP A	Medium
546	S32 38 09.9 E21 02 11.8	Pre-colonial kraal complex with numerous enclosures and stone-walled features (about 27 or 29 in total) scattered around and on top of a low rocky outcrop. A few Stone Age artefacts were found as well as a number of fragments of ostrich eggshell. A few recent items (liquor bottle and a shoe fragment) testify to more recent use of the area. Note that waypoints 528 to 553 inclusive were all at this kraal complex but that 546 is taken as an approximately central location for the site.	III A	High
554	S32 38 10.5 E21 02 19.8	Small stone structure perched on the edge of a scarp. Unknown function but perhaps a lookout point?	GP C	Low
555	S32 38 09.2 E21 02 21.1	Small semi-circular stone structure with entrance to the east. There are also a few other stone features close by.	GP B	Low-Medium
574	S32 37 22.1 E20 54 33.7	Isolated tea cup fragment.		
575	S32 37 40.0 E20 54 39.3	Small piled stone structure of about 1.5 m by 3 m built along the edge of a small scarp. Probably related to other stone structures further east along the same scarp and recorded by Halkett & Webley (2010).	GP C	Low
576	S32 38 42.8 E20 54 53.4	Small piled stone structure of about 1.5 m by 3 m. Two unburnt and one burnt bone fragments were only associated materials present.	GP C	Low
580	S32 37 57.6 E21 02 11.6	An isolated flake. Seems fairly fresh and is likely LSA.		
581	S32 37 56.4 E21 01 54.5	Point along old fence line which employed long, thin rock slabs as fence poles accompanied by small, locally-sourced sticks. Fence is parallel to proposed power line.	GP C	Low
582	S32 37 58.1 E21 01 35.9	Point along old fence line which employed long, thin rock slabs as fence poles accompanied by small, locally-sourced sticks. Fence is parallel to proposed power line.	GP C	Low
583	S32 37 59.4 E21 01 15.9	Point along old fence line which employed long, thin rock slabs as fence poles accompanied by small, locally-sourced sticks. Fence is at 90 degrees to proposed power line.	GP C	Low
584	S32 38 22.0 E20 59 32.5	Isolated 19 th century refined white earthenware fragment. Note that Halkett & Webley (2010) reported three graves here but none were seen – there are loose clusters of natural stones overlying weathered bedrock.		
585	S32 38 23.3 E20 59 32.7	Loosely-packed stone cairn downslope from overhang with stone-walled structure inside it.	GP C	Low

Waypoint	Co-ordinates	Description	Grade	Cultural significance
586	S32 38 24.6 E20 59 30.8	Stone-packed structure underneath a rock overhang. The rock was sourced from the roof collapse and subsequent collapse has damaged part of the site.	GP B	Low-Medium
587	S32 38 10.6 E21 02 06.2	Small, rectangular structure built against a rock outcrop. From its construction (of flat slabs) and preservation is must be historical.	GP B	Low-Medium
588	S32 38 10.6 E21 02 07.0	Semi-circular stone walling along the edge of and extending partly away from a rock scarp. Very close to the small structure at 587. It is made from rounded rocks and piled in a manner more similar to pre-colonial walling. It may be historical or it may relate to the pre-colonial kraal cluster located 50 m to the east.	GP C	Low
	•	WESTERN CAPE		
483	S32 39 59.5 E21 15 21.2	A small cottage lies some 700 m to the west of the alignment. It was not visited but a photograph reveals it to be a vernacular cottage with external hearth and chimney stack.	IIIB	Low-medium
485	S32 41 02.5 E21 15 45.0	A very tiny "dam" created by placing a single line of about 15 stones across the lowest point of a tiny pan.	NCW	Very low
486	S32 41 47.3 E21 15 51.1	A stone feature that may be either a circle or a semi-circle. No obvious associated material in the vicinity.	NCW	Very low
488	S32 40 15.2 E21 16 42.2	A section of historical road alignment left behind after the main road was straightened.	NCW	Very low
489	S32 39 17.7 E21 17 02.4	Isolated (probable) lower grindstone in a pan.	NCW	Very low
490	S32 38 11.6 E21 16 54.1	Graveyard with five deceased and what seem to be three empty graves. Deaths in 1954, 1958, 1979, 1995, 1996.	IIIA	High
491	S32 38 10.9 E21 16 29.5	A few isolated historical artefacts in this area. Two ceramics likely from the same vessel and located 20-30 m apart, a piece of glass and a tin. Also a stone flake here.	NCW	Very low
492	S32 38 16.5 E21 15 59.4	Rock art site with eight finger-painted vertical stripes applied to three different 'canvases' (small faces on a very irregular surface). No associated artefacts seen and there is no proper rock shelter. The site overlooks a river valley.	IIIA	High
493	S32 38 19.2 E21 16 00.7	A small stone structure measuring 1.2 x 1.6 m and about 0.8 m high. It lies on the top of a scarp, very close to the edge. Slabs create a roof with an interior far too small for human use.	IIIC	Low
496	S32 38 08.1 E21 16 59.9	Farm house and barn on Hamelkraal 16/6. Probably early-mid-20 th century.	IIIB	Low-medium
		Waypoints 497-508 are all part of a single historical farm complex, while the track marked by 509-512 is no doubt directly related to it. The entire complex is graded as a whole.		
497	S32 38 08.8 E21 15 21.5	Elongated stone feature.		
498	S32 38 09.2 E21 15 21.1	Small one-roomed stone house with a pitched roof and four rooms (roofs all missing) added to it on the west and south. Two of the rooms on the west have curved walls – an extremely unusual feature. Also two paved surfaces on the north and	IIIA	High

Waypoint	Co-ordinates	Description	Grade	Cultural significance
waypoint	Co-ordinates	east sides of the house. Main house has had roof trusses and metal roof sheets added in more recent times (perhaps early-mid-20 th century) to allow the structure to continue to be used. Internal plaster was probably also added at this time but is peeling off. Unworked / minimally worked wooden beams used on roofs of added rooms. It is notable that there is no dump in the vicinity of the house and outbuildings. However, there are many fragments of glass, ceramics and metal (including many car parts) scattered in low density over the general area. Much of this material is mid-20 th century in age but there is definitely some 19 th century material. A fragment of a cobalt blue bottle has "Cape Town"	Grade	significance
		dressing flakes in the area and many of the blocks in the structures are dressed stones.		
499	S32 38 09.4 E21 15 19.1	A circular ' <i>trapvloer</i> ' of about 7 m diameter with standing stones around its margin.		
500	S32 38 07.8 E21 15 19.8	A second dwelling house with two rooms, both of which have curved walls. Each room has a very small 'muurkas' (more of a shelf) built into it. A low stone wall encloses a stoep area on the east side and a small stone pillar stands on one side of the entrance to this stoep area. Unworked / minimally worked wooden beams used on roof. Also a scattering of glass, ceramics and metal (again including a few presumed car parts) around the general area.		
601	S32 38 07.4 E21 15 20.1	A small, circular stone feature of about 2 m diameter.		
602	S32 38 08.0 E21 15 20.1	A packed stone feature of about 2 x 4 m.		
603	S32 38 09.1 E21 15 20.5	A small, circular stone feature of about 2 m diameter but slightly taller than 501.		
604	S32 38 09.1 E21 15 22.5	The remains of a fenced kraal that has several standing stone fence posts but no sign of any wire fencing. Approximately 15 x 17 m in size.		
605	S32 38 11.2 E21 15 21.8	An assortment of scattered slabs, rocks and one standing stone fence post on the river floodplain across the river from the house.		
606	S32 38 12.5 E21 15 21.3	A small, low stone-lined dam with a line of stones of indeterminate function very nearby. The dam is under thorn trees so size not determined.		
607	S32 38 13.1 E21 15 24.5	A rectangular stone foundation of about 4 x 8 m. Running towards the north is a series of U-shaped (worked) slabs planted on edge. Their function is unknown.		
608	S32 38 11.6 E21 15 25.9	A probable grave which has been partially excavated by an animal. This has resulted in collapse of some of the stones making it difficult to be certain of whether it is a grave. But it seems very likely.		
609	S32 38 11.9 E21 15 26.2	These points lie along an ephemeral track that		
610	S32 38 07.4 E21 15 30.6	runs along the base of the hill past 509 then turns	IIIC	Low
611	S32 38 06.4 E21 15 34.2	eastwards past 510 and 511 then fading out at		

Waypoint	Co-ordinates	Description	Grade	Cultural significance
612		512. It appears from aerial photography to		
012	352 56 05.9 E21 15 50.6	continue towards the north east.		
613	S32 38 29.7 E21 15 50.1	Small stone cairn.	NCW	Very low
		Waypoints 614-618 are all part of a single historical farm complex. The entire complex is graded as a whole.		
614	S32 37 50.2 E21 14 08.8	A small, rectangular stone one-roomed house of beautifully dressed blocks. It has a door facing east, a window facing west and a small 'muurkas' (more of a shelf) in each end wall. It is 2.5 x 2 m. There is a cleared area around the house with stones pushed loosely to the edge. There are various loose piles of stones or 'features' around the edge of the cleared area.		
615	S32 37 49.3 E21 14 08.7	A rectangular stone foundation of about 2 x 3 m.		
616	S32 37 49.0 E21 14 07.6	A 2.5 x 2.5 m possible grave or a collapsed structure. One standing stone 'post' might be a headstone and would be in position for one burial in a double grave but it's position would mean the grave is facing north instead of east. The stones are not well-ordered suggesting it to more likely be a collapsed structure. It also lies on a rocky slope which would not be suited to the excavation of a grave. The stones are not deep enough for a stone-packed surface grave. There is a second stone feature some 10 m to the southwest.	IIIA	High
617	S32 37 50.8 E21 14 07.1	A ' <i>waterput</i> ' excavated into the bedrock. It is 2.5 m in diameter and about 4 m deep.		
618	S32 37 51.1 E21 14 07.6	A small, low stone-lined dam of about 9 x 10 m.		
619	S32 38 05.6 E21 13 15.0	A dam across a small river valley with a stone- packed wall of about 1 m high.	IIIC	Low
620	S32 39 14.0 E21 16 31.8	A pile of stones, possibly a cairn of sorts.	NCW	Very low

6.1. Archaeology

Stone Age archaeological resources were found to be rare throughout the study area. Occasional isolated stone artefacts attributable to the background scatter were found in places including two lower grindstones. Both of the latter were found close to streams with one of them being very large and featuring a prominent groove indicative of extensive use (Figure 12). Another lightly used grindstone was found in an ephemeral pan to the southeast of the escarpment. None of the grindstones was accompanied by any other visible artefacts. Other isolated artefacts, generally flakes, were found to be more common on the plains below the escarpment, although even so, only a handful were seen during two days of survey there.

Only two significant Stone Age sites were found. The first was a complex of stone-walled kraals at waypoint 546. The complex does not lie along the power line alignment but, importantly, is bisected by one of the access roads in the area. Figures 13 to 16 show views of some of the individual enclosures. Altogether there were about 27 enclosures or stone-walled features. Because of its importance it was mapped carefully (Figure 17).



Figure 12: Isolated grooved lower grindstone found alongside a stream at waypoint 515 in the western part of the study area. It is approximately 60 cm long and 37 cm wide.



Figure 13: View of a large enclosure on the east side of the rock outcrop.



Figure 14: A very small enclosure on the northeast side of the rock outcrop.



Figure 15: Two enclosures, one very large, on the north-western side of the outcrop.



Figure 16: An enclosure on the top of the rock outcrop.



Figure 17: Plan of the kraal complex at waypoint 546 showing topographic features in brown and stone walling in black. The double dashed lines indicate the position of the current access road which takes advantage of a break in the scarp.

Careful examination of the substrate revealed very few cultural materials; eight ostrich eggshell fragments, five quartzite flakes, one quartzite core, one quartz flake and one quartz chunk were the only Stone Age items found. These sixteen items were found spread over a total of eight locations on the site. Also present, and located together on the eastern edge of the outcrop closest to the road, were the sole of a historical shoe and a piece of a liquor bottle, signs that the area was used in more recent times as well. The walls of the complex are made from piled stone which is what differentiates them from historical kraals and stone features which are made from packed stone. It is positioned on the crest of a north-facing scarp in a prominent position overlooking the plains to the north (Figure 18).



Figure 18: View towards the south showing the location of the Stone Age kraal complex. The skyline in the background is the crest of the escarpment.

The second important Stone Age site was a small rock art site. Because the imagery is comprised of a series of finger-painted red lines, it would be classed as a geometric rock art site (Figure 19). Finger-painted smear/lines are one of the categories of geometric art identified by Eastwood and Smith (2005). A key element of geometric art is that it tends to be found in non-inhabitable shelters overlooking water sources. The present site overlooks a river bed and has neither a flat base that would allow occupation nor an overhang that would offer shelter from the elements (Figure 19). This was one of the sites that resulted in the abandonment of one of the surveyed alternatives.



Figure 19: View of the main painted area with the upper end of each finger smear identified by red arrows. Two further smears lie out of view to the right.



Figure 20: View towards the south of the low cliff line on which the geometric paintings were located (waypoint 492). The red arrows indicate the approximate positions of the finger-painted smears.

Historical archaeological features were numerous and found virtually throughout the study area in varying densities. These varied from small, isolated stone features like cairns, to small ruined structures, larger ruined structures and entire complexes of ruined structures and features. Figures 21 and 22 show examples of stone cairns, one very large and formal and no doubt a boundary marker, the other simply a pile of stones of indeterminate function. Even more ephemeral than this small cairn was a tiny 'dam' created by placing a single line of stones across a flat area where it was recognised that water would accumulate with only a minor modification (Figure 23). This was no doubt done to provide a place where rainwater could accumulate and allow livestock to drink.



Figure 21: The large stone boundary marker at waypoint 518.



Figure 22: A small, loosely-packed stone cairn at waypoint 613.



Figure 23: A small 'dam' at waypoint 485. The inset shows the single line of stones forming the 'wall'.

A number of small, usually isolated and very low structures were found. These may well relate to shepherds constructing small shelters for themselves. One of them (Figure 24) was built up against a low (*c.* 1 m high) cliff line that formed the southern edge of a small rocky ridge. Although it stood on its own, the desktop study revealed that Halkett and Webley (2011) had documented further structures some 175 m away to the east along the same cliff line. They listed their find as "Probably shepherd's hut adjacent to lammerkraal, which is adjacent to larger kraal (2x1m; 2x1m; 5x4m). Glass, metal, bullet casings, bone." Interestingly they found a few artefacts suggesting a domestic function for the site. Some 2 km to the south of these enclosures was a small, isolated stone structure that, although tumbled, retained enough integrity to see that it had been packed in the traditional historical style (Figure 25). Three fragments of bone, one of them burnt, were found there.



Figure 24: A small stone-walled structure built on a low rock ridge against a small 'cliff' at waypoint 575.The 'cliff' is on the left.



Figure 25: A small oval structure standing in the open away from any landscape features at waypoint 576.
Only slightly more formalised was a pair of structures located close to a small dam on high ground near the edge of the escarpment (Figure 26). Somewhat more formal was a stone hut with a doorway that was located in a small but pronounced river valley close to a small waterfall which no doubt provided water during wetter times (Figure 27).





Figure 26: The two small stone structures at waypoints 521 & 522.

Figure 27: View of the south face and entrance of the small stone hut at waypoint 524.

The most impressive historical archaeological sites were located on the farm De Molen 5/2 below the escarpment. Here there was a small historic farmstead as well as a smaller outpost. The main farmstead was built on the edge of a stream bed and had a number of features. There were two houses that no doubt had their roots deep in the 19th century (Figures 28 & 29). Survey diagram 1589/1861 indicates that farm De Molen 5 was first surveyed in 1860, but no structures are indicated (this does not mean there were none as they are only sometimes marked). Portion 2, then named 'Chreswell', was subdivided off in 1930 but again no structures were marked. These structures are unusual because of the use of curved stone walling in them, one exclusively and the other in conjunction with straight walls. The main house has an iron roof on it that was a later addition as evidenced by its supporting joinery. The remaining rooms of both structures have a number of rough beams present which have largely collapsed with time. These beams are really just unworked tree trunks.

The main house has a paved stop area to the east that overlooks a small track leading down to the river bed below. The north side of the house where the entrance lies also has a paved area. Both paved areas are supported by a low stone retaining wall. The house is comprised of a main rectangular structure with four added rooms. The smaller house had two linked rooms and a small enclosed courtyard on its east side where the entrance lay. Interestingly, this structure had two small 'muurkaste' built into its walls.

Artefactual material was present thinly over much of the surrounding area but nowhere was there anything resembling a dump. What material there was seemed typical of the late 19th and early 20th centuries and included blue glass, small clear medicine bottles, sponge printed refined white earthenware, a fragment of a cast iron '*potjie*', the handle of a (probably) nickel silver fork and a spoked motor car wheel. The fork was inscribed with "WT&S" which denotes the company "William Tay and Sons" who seem to have been in operation during the first third of the 20th century (Dognose n.d.).







Figure 28: Plan of the stone-walled house at waypoint 498 with (A) a view of the entrance and north-eastern corner, (B) View of the south-western corner of the site showing the curved walling, (C) the east-facing window in the central structure, and (D) the north-facing doorway in the central structure. Not to scale but approximate measurements are indicated.



Figure 29: Plan of the stone-walled house at waypoint 500 with (A) a view towards the west of the entrance, (B) a view towards the south of the northern lobe showing remaining roof 'beams', (C) a view of the high 'muurkas' in the western lobe and (D) a view of the east-facing window with wooden planks and sticks in the southern lobe. Not to scale but approximate measurements are indicated.



Nearby above the stream was a fairly well-preserved threshing floor (Figure 30), while within the stream floodplain a few stone features were noted. These latter included loose clusters of rocks that no doubt were once arranged differently, a set of upright elongated rocks that once formed fence posts for a stock enclosure, a stone-lined reservoir, a foundation, and a set of rocks that may have held a pipe (Figure 31).



Figure 30: View towards the north of the threshing floor with the lobed structure (from Figure 29) visible in the background.



Figure 31: A set of stones that may have held a pipe or similar.

Further to the west lay a smaller complex, perhaps an outpost of the one just described. It had a single-roomed rectangular structure with similar roof beams. There was a cleared area and various

piles of rocks around the structure and, further away, a large grave-like feature (but almost certainly not a grave), a stone-lined reservoir and a '*waterput*' (Figure 32).



Figure 32: The complex at waypoint 614; (A) shows the house, (B) a muurkas, (C) a roof beam, (D) the stone pile at waypoint 616, (E) the waterput at waypoint 617 and (F) the stone-lined reservoir.

6.2. Palaeontology

A specialist palaeontological study was carried out by Dr John Almond (2017) and is included as Appendix 3 of the present report.

Almond (2017:1) reports that the study area "is entirely underlain by continental sediments of the Abrahamskraal Formation (Lower Beaufort Group) of Middle Permian age. This fluvial and lacustrine succession is generally assigned a high palaeontological sensitivity due to its rich fossil biota including pareiasaur reptiles, a wide range of therapsids, fish, amphibians, petrified wood and other remains of the *Glossopteris* Flora as well as trace fossils and microfossils. The Palaeozoic sedimentary bedrocks are extensively covered by Late Caenozoic superficial sediments (*e.g.* scree, gravelly soils) that are usually unfossiliferous."

Despite finding a few interesting fossils, including some blocks of petrified wood, a number of tetrapod burrows, and an articulated post-cranial skeleton, Almond (2017) has considered the

study area to be of generally low sensitivity because he located no important fossils along the route and in many areas the surface is covered by a large amount of superficial sediment.

6.3. Graves

No isolated graves were seen during the survey. However, several graveyards are present in the general area. One was found to lie within an agricultural field close to an access road for the original Alternative 1 alignment (Figure 33), while another was within the path of one of the routes previously considered for Alternative 2. No graves were found close to the currently assessed alignments.



Figure 33: An old graveyard with simple stone headstone at waypoint 573.



Figure 34: A formally laid-out family graveyard in the far eastern part of the study area at waypoint 490.

6.4. Built environment

A number of farm buildings were seen in the general vicinity of the study area, generally while driving in to the proposed alignments, but all lie well away from the proposed routes. The only structures near enough to be worth reporting are a farm complex close to the third-party Suurplaat

Substation (630 m from the eastern end of the Alternative 1 power line route; Figure 35) and a small vernacular cottage 700 m from the route near the eastern end of Alternative 2 (Figure 36). Neither will be meaningfully impacted due to the distances involved.





Figure 36: Small cottage at waypoint 483.

6.5. Cultural landscape

Winter and Oberholzer (2013) regard the escarpment as a significant natural landscape at the local level. It is a very extensive landscape extending for many hundreds of kilometres through central South Africa, often providing very long views (Figures 37 and 38). It can also be regarded as a cultural landscape, perhaps not so much in the regular sense of a 'landscape shaped by man' but in the opposite way where we find a landscape that has determined how and where human settlement and activities have taken place. Farmsteads are relatively few and far between, often tied to natural water sources and the landscape, although best described as a rural one, frequently has a strong feeling of emptiness and remoteness. It is used almost exclusively for small stock grazing and the proliferation of small historic stone features across the landscape is indicative of this use in times gone by. In some remote areas the only indicators of human intervention for many kilometres are occasional fences and vehicle tracks.



Figure 37: View towards the northeast in the central part of the Alternative 1 area exemplifying the landscape above the escarpment with its undulating topography and lack of prominent mountains.



Figure 38: View towards the southeast in the eastern part of the study area showing the typical landscape below the escarpment. It is comprised largely of plains with the prominent mountains of the escarpment in the far distance.

It is pertinent to note, however, that this landscape can no longer be regarded as pristine because the present study area falls within a proposed REDZ and many other renewable energy facilities have been proposed here, some of them due for construction shortly. This will mean that wind turbines and power lines (should they receive authorisation) will comprise a new layer on this landscape, the strongest layer yet.

6.6. Summary of heritage indicators

Archaeological remains are generally scarce but are found throughout the area. Very little Stone Age material was found with just two 'sites' being recorded: a kraal complex (waypoint 546) and a geometric rock art site (waypoint 492). Isolated stone artefacts were remarkably rare. The vast majority of archaeological remains found were historical and ranged from a ruined farm complex to small, isolated ruined structures (one of which lies within the proposed Sutherland substation development envelope) and isolated individual artefacts. The eastern part of Alternative 2 has more significant sites in close proximity to it but, because the alignment was devised by the present author to avoid these sites, direct impacts are not expected.

Although palaeontological resources were found throughout much of the study area, the vast majority were of very limited significance. Two important fossil sites were found but both were located away from the proposed power line footprint and impacts are not expected.

Some graveyards and buildings are present in the area but are located well away from the proposed power line alignments and no impacts are expected.

The rural cultural landscape extends throughout the study area but, aside from fences and farm tracks, human interventions are generally very sparse. The site lies within a proposed REDZ and it is noted that a new electrical layer is due to be added to this landscape in the very near future.

6.7. Statement of significance and provisional grading

Section 38(3)(b) of the NHRA requires an assessment of the significance of all heritage resources. In terms of Section 2(vi), "cultural significance" means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.

The vast majority of archaeological resources are deemed to have low cultural significance ('IIIC' or 'NCW' in the HWC grading system and 'GP B' or 'GP C' in the SAHRA system) for their scientific value but there are a few more important sites in the study area that could be rated as worthy of a IIIA grading (both systems).

Graves are deemed to have high cultural significance for their social value.

The two structures located within 1 km of the proposed powerline have moderate significance for their architectural and possibly social values. They are likely worthy of a 'IIIB' grading in terms of the HWC system (the SAHRA system is not intended to be used on buildings).

The cultural and natural landscape in its current form (i.e. with no renewable energy facilities and very few power lines) has high significance and would be worthy of a 'IIIA' grading (in the HWC system). However, considering the renewable energy facilities planned for construction in the area this grading would likely need to be reduced in areas within easy sight of these facilities. It should still not drop below 'IIIB' however (again the SAHRA system does not apply to landscapes).

7. IMPACT ASSESSMENT

The majority of impacts will be felt during the construction phase when land is cleared and excavations are made for the purposes of erecting the power line pylons. The impact assessments are summarised in Tables 2 to 5 and apply equally to both Alternative 1 and Alternative 2. The nature and significance of impacts – based on known sites – is likely to be the same except that a few more sites may be affected by Alternative 2 because it is longer.

Only impacts to archaeology, palaeontology and the cultural landscape are specifically assessed. This is because impacts to graves and buildings are not expected to occur. Those sites found were located too far away from the proposed alignments to be of any concern.

The no-go alternative is not specifically assessed here because no new impacts would occur through continued use of the landscape according to the status quo (i.e. small stock farming). Impacts would thus be seen as of **very low** significance.

7.1. Direct Impacts

7.1.1. Construction Phase

Potential impact to archaeological resources

Direct impacts to archaeological resources may occur when construction vehicles move through the area and when foundation excavations are made. Because of the very sparse distribution of archaeological resources (significant or otherwise) and the very few that were located in or close to the proposed footprint, the impact significance is regarded as being **low** before mitigation. Potential mitigation measures include avoiding and protecting all sites that are not within the actual footprint and adequately recording and/or sampling any sites that cannot be avoided (No sites requiring mitigation have been found to date within the project footprint). The farm road passing through the kraal complex (waypoint 546) may not be widened towards the east and preferably should not be widened at all. Those sections of the final alignment that have not been surveyed should be subjected

to a pre-construction walk-down survey to locate any sites that need to be avoided or mitigated. With mitigation the impact significance is likely to be reduced to **very low**.

Potential impact to palaeontological resources

Direct impacts to palaeontological resources may occur when construction vehicles move through the area, when land is cleared for development, and when foundation excavations are made. Because of the very sparse distribution of palaeontological resources (significant or otherwise) and the fact that none were located in or close to the proposed footprint, the impact significance is regarded as being **very low** before the implementation of mitigation measures. Potential mitigation measures include avoiding and protecting known fossil occurrences that are not within the actual footprint and adequately recording and/or sampling any localities that cannot be avoided (none have been found to date). Those sections of the final alignment that have not been surveyed should be subjected to a preconstruction walk-down survey to locate any fossils that need to be avoided or mitigated. Because of the low likelihood of finding fossils, the impact significance with mitigation is likely to also be **very low**.

Potential impacts to the cultural landscape

The cultural landscape will be impacted through the presence of incompatible structures (the proposed power line and its pylons) and the construction vehicles in the rural landscape. Because the area is within a proposed REDZ and many other renewable energy facilities and power lines are proposed (some are due for construction in 2017), the impact significance is assessed as being **low** without the implementation of mitigation measures. Mitigation measures for the proposed power line are generally impossible because one cannot hide them but a measure applicable to the proposed service road is to avoid steep slopes where the road would be visible from longer distances. This is mainly applicable to the scarp within the Alternative 2 alignment – the detour route around the east side of the scarp must be used there. Mitigation measures will not alter the impact significance which remains **low** after mitigation.

7.1.2. Operation Phase

Potential impact to archaeological resources

Direct impacts to archaeological resources are highly unlikely to occur during this phase because vehicles will use the already established service road and public road. The impact significance would be **very low** without the implementation of mitigation measures. The only suggested mitigation measure is to ensure that all vehicles remain on the service road at all times. With mitigation the impact significance would remain **very low**.

Potential impact to palaeontological resources

Direct impacts to palaeontological resources are highly unlikely to occur during this phase because vehicles will use the already established service road and public road (note that for this reason the palaeontological specialist study did not specifically address the operation phase). The impact significance would be **very low** without the implementation of mitigation measures. The only suggested mitigation measure is to ensure that all vehicles remain on the service road at all times. With mitigation the impact significance would remain **very low**.

Potential impacts to the cultural landscape

The cultural landscape will be impacted through the presence of incompatible structures (the proposed power line and its pylons) in the rural landscape. Because the area is within a proposed REDZ and many other renewable energy facilities and power lines are proposed (some are due for construction in 2017), the impact significance is assessed as being **low** without the implementation of

mitigation measures. No mitigation measures are suggested for this phase and the impact significance remains **low**.

7.1.3. Decommissioning Phase

Potential impact to archaeological resources

Direct impacts to archaeological resources are highly unlikely to occur during this phase because vehicles will use the already established service road and public road. The impact significance would be **very low** without the implementation of mitigation measures. The only suggested mitigation measure is to ensure that all vehicles remain on the service road at all times. With mitigation the impact significance would remain **very low**.

Potential impact to palaeontological resources

Direct impacts to palaeontological resources are highly unlikely to occur during this phase because vehicles will use the already established service road and public road (note that for this reason the palaeontological specialist study did not specifically address the decommissioning phase). The impact significance would be **very low** without the implementation of mitigation measures. The only suggested mitigation measure is to ensure that all vehicles remain on the service road at all times. With mitigation the impact significance would remain **very low**.

Potential impacts to the cultural landscape

The cultural landscape will be impacted through the presence of construction vehicles in the rural landscape when the power lines are removed. Because the impact will be of short term duration, the impact significance is assessed as being **very low** without the implementation of mitigation measures. The only mitigation measure is to ensure that rehabilitation is effective and that no landscape scarring remains visible from long distances. The impact significance will remain **very low**.

7.1.4. Cumulative Impacts

Potential cumulative impact to archaeological resources

Cumulative impacts to archaeological resources are the same as the construction phase impacts except that they may occur over a larger area. Because of the very sparse distribution of archaeological resources (significant or otherwise) and the very few that were located in or close to the proposed footprint, the cumulative impact significance is regarded as being **low** without the implementation of mitigation measures. Potential mitigation measures include avoiding and protecting all sites that are not within the actual footprint and adequately recording and/or sampling any sites that cannot be avoided (none have been found to date). Those sections of the final alignment that have not been surveyed should be subjected to a pre-construction walk-down survey to locate any sites that need to be avoided or mitigated. With mitigation the impact significance is likely to be reduced to **very low**.

Potential impact to palaeontological resources

Direct impacts to palaeontological resources are the same as the construction phase impacts except that they may occur over a larger area. Despite the very sparse distribution of palaeontological resources (significant or otherwise), there is still a very real chance that significant fossils may be impacted during the very many excavations that would be required for all the proposed turbine and power line foundations that would need to be constructed in the area, the cumulative impact significance is regarded as being **moderate** without the implementation of mitigation measures. This is elevated partly by the high degree of uncertainty because several renewable energy facilities in the area have yet to be studied in the field. Potential mitigation measures include avoiding and protecting

known fossil occurrences that are not within the actual footprint and adequately recording and/or sampling any localities that cannot be avoided (none have been found to date). Those sections of the final alignment that have not been surveyed should be subjected to a pre-construction walk-down survey to locate any fossils that need to be avoided or mitigated. Because of the relatively low likelihood of finding fossils within the present development area, the cumulative impact significance with mitigation is likely to be **very low**.

Potential impacts to the cultural landscape

The cultural landscape will be impacted through the presence of incompatible structures (the proposed power line and its pylons) and the construction vehicles in the rural landscape. Because the area is within a proposed REDZ and many other renewable energy facilities and power lines are proposed (some are due for construction in 2017), the impact significance is assessed as being **low** without the implementation of mitigation measures. In addition, the proposed power line would make a fairly small contribution to the overall visual impact to the landscape. Mitigation measures for the power line are generally impossible because one cannot hide them but a measure applicable to the proposed service road is to avoid steep slopes where the road would be visible from longer distances. This is mainly applicable to the scarp within the Alternative 2 alignment – the detour route around the east side of the scarp must be used there. Because the power line would likely be seen against a backdrop of other similar structures, the impact significance will be **very low** after mitigation.

7.2. Indirect Impacts

Indirect impacts could occur in two ways:

- 1. During construction there could be unintended impacts either through, for example, vehicles deviating from the permitted route or from construction personnel ignorantly damaging heritage sites in proximity of the power line; or
- 2. Contextual impacts could occur because of the existence of incompatible structures (power lines and pylons) in the rural landscape which spoil the immediate context of a heritage site.

The first type of impact is generally unlikely to happen because there are very few heritage sites within close enough proximity to the alignments. Rock art sites are usually the most vulnerable to human damage, often in the form of graffiti, but in this instance the chances of anyone finding the site are virtually zero, despite its proximity to the study area. Rock art is also sensitive to contextual impacts but in this case the painted panels face away from the power line and the site would be completely unaffected. The two sensitive historical ruins lie some 310 m (waypoint 614) and 150 m (waypoint 498) from the proposed alignments and will need to be marked as no-go areas.

Because of the very low probability of indirect impacts occurring, the significance of all such impacts will be very low, and certainly lower than the significance of the potential direct impacts listed above.

act pathway	itial impact/risk	tus	Extent	ition	luence	bility	y of impact	y of receiving nt/resource	ation measures	Significance of impact/risk = consequence x probability		impact/risk	nce level
Aspect/ Imp	Nature of poten	Sta	Spatial	Dura	Consec	Proba	Reversibilit	Irreplaceabilit environmer	Potential mitig	Without mitigation /management	With mitigation /management (residual risk/impact)	Ranking of	Confider
CONSTRU	JCTION PHASE												
oposed and service	Destruction of archaeological remains	Negative	Site	Permanent	Moderate	Very likely	Non- reversible	High	 Avoid and protect sites if possible. Farm road through kraal complex may not be widened to the east. Walk down of unsurveyed areas. Record significant sites in footprint. 	Low	Very low	5	Medium
onstruction of pu lines, substatior road	Destruction of palaeontological material	Negative	Site	Permanent	Slight	Unlikely	Non- reversible	Moderate	 Avoid and protect fossils if possible. Walk down of unsurveyed areas. Monitoring by the Environmental Control Officer (ECO) and rescue of isolated finds. 	Very low	Very low	5	Medium
Cc powerl	Alteration of the cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	 Avoid creating roads up steep slopes. Follow suggested service road detour on Alternative 2. 	Low	Low	4	High

Table 2: Impact assessment summary table – Construction Phase direct impacts.

ct pathway	ial impact/risk	5	sn	SU	su	sn	sn	sn	SI	S	S	S	extent	ion	eouer	oility	of impact	of receiving t/resource	tion measures	Significance of impact/risk = consequence x probability		impact/risk	ce level
Aspect/ Impa	Nature of potent	Stat	Spatial E	Durat	Consequ	Probat	Reversibility	Irreplaceability environment	Potential mitiga	Without mitigation /management	With mitigation /management (residual risk/impact)	Ranking of ir	Confidenc										
OPERATION P	PHASE								·														
nd e of station oad	Destruction of archaeological remains	Negative	Site	Perma nent	Slight	Extreme ly unlikely	Non-reversible	High	Stay on service road at all times.	Very low	Very low	5	High										
istence al intenance lines, sub service r	Destruction of palaeontological material	Negative	Site	Perma nent	Slight	Extreme ly unlikely	Non-reversible	Moderate	Stay on service road at all times.	Very low	Very low	5	High										
Ex mai powerl and	Alteration of the cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	None feasible.	Low	Low	4	High										

Table 3: Impact assessment summary table – Operation Phase direct impacts.

ct pathway	ial impact/risk	SI	extent	ion	nence	oility	of impact	r of receiving t/resource	tion measures	Significance of impact/risk = consequence x probability		npact/risk	ce level
Aspect/ Impa	Nature of potent	Stat	Spatial E	Durat	Consequ	Probak	Reversibility	Irreplaceability environmen	Potential mitiga	Without mitigation /management	With mitigation /management (residual risk/impact)	Ranking of ir	Confiden
DECOMMISSI	ONING PHASE												
' lines and ervice	Destruction of archaeological remains	Negative	Site	Permanent	Slight	Extremely unlikely	Non- reversible	High	Stay on service road at all times.	Very low	Very low	5	High
of power bstation a ition of se road	Destruction of palaeontological material	Negative	Site	Permanent	Slight	Extremely unlikely	Non- reversible	Moderate	Stay on service road at all times.	Very low	Very low	5	High
Removal and sul rehabilita	Alteration of the cultural landscape	Negative	Local	Short term	Slight	Very likely	High	Moderate	 Ensure rehabilitation is effective and that no landscape scarring remains visible from long distances. 	Very low	Very low	4	High

Table 4: Impact assessment summary table – Decommissioning Phase direct impacts.

Aspect/ Impact pathway	Nature of potential impact/risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of impact	Irreplaceability of receiving environment/resource	Potential mitigation measures	Without imbact = consed bropat /management /management	With mitigation with with the source of the	Ranking of impact/risk	Confidence level
CUMULA	TIVE IMPACTS												
sed and	Destruction of archaeological remains	Negative	Local	Permanent	Moderate	Very likely	Non- reversible	High	Avoid and protect sites if possible.Record significant sites in footprint.	Low	Very low	5	Medium
uction of propo ines, substation service road	Destruction of palaeontological material	Negative	Local	Permanent	Substantial	Unlikely	Non- reversible	Moderate	 Avoid and protect fossils if possible. Walk down of unsurveyed areas. Monitoring by ECO and rescue of isolated finds. 	Moderate	Very low	5	Medium
Constri powerli	Alteration of the cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	 Avoid creating roads up steep slopes. Follow suggested service road detour on Alternative 2. 	Low	Very low	5	High

Table 5: Impact assessment summary table – Cumulative impacts (Construction Phase)

8. LEGISLATIVE AND PERMIT REQUIREMENTS

Because the project spans two provinces with two heritage resources authorities, there are slightly different requirements.

In Northern Cape (applicable to both Alternatives):

There are no permits required of the developer – the final comment acts as the approval (with conditions). Should there be a need to conduct archaeological or palaeontological mitigation this would need to be done under a permit applied for by and issued in the name of the person doing the mitigation work. This would need to be an appropriately qualified person.

In Western Cape (applicable to Alternative 2 only):

There are no permits required of the developer – the final comment acts as the approval (with conditions). Should there be a need to conduct archaeological or palaeontological mitigation this would need to be done under a workplan applied for by and issued in the name of the person doing the mitigation work. This would need to be an appropriately qualified person.

9. ENVIRONMENTAL MANAGEMENT PROGRAMME INPUTS

A limitation of this assessment was the inability to access certain portions of land. This will need to be rectified in the pre-construction phase.

Points for inclusion in the Environmental Management Programme (EMPr) are thus as follows:

- Ensure that all areas not already surveyed as part of this assessment are examined by both an
 archaeologist and a palaeontologist in order to identify any areas or sites that should be
 protected or mitigated prior to commencement of development. Note that this requirement
 pertains to unsurveyed parts of the assessed routes as well as to any alterations to the routing
 made after completion of this report;
- The ECO should be aware of the potential for fossils to be uncovered during excavations. Excavations should be monitored by the ECO during construction and if any fossils are uncovered they should be protected *in situ* and immediately reported to a palaeontologist in order to plan a way forward. It is understood that the ECO would not be able to watch the excavation team full time, but as many holes as possible should be examined along with their spoil heaps;
- The farm road passing through the kraal complex (waypoint 546) may not be widened towards the east and should preferably not be widened at all;
- Significant palaeontological and archaeological sites (especially the two ruined complexes around waypoints 498 and 614) should be identified on project maps and regarded as no-go zones with buffers of at least 30 m around all associated features (the exception is the service road diversion which comes within 20 m of the rock art site but uses an existing farm track). There is one fossil site (a scatter of petrified wood) some 500 m from Alternative 2 and a number of archaeological sites along both alternatives (Figures 39 to 41);

- These no-go sites should be examined periodically by the ECO during the construction phase to ensure that they are being respected;
- If any archaeological or palaeontological material is encountered during any phase of the project it should be protected *in situ* and reported to an appropriate specialist and/or to the relevant heritage resources authority so that a decision can be made as to how to proceed.

The relevant waypoints to be avoided with buffers of at least 30 m around all associated features are as follows (from west to east): 575, 576, 524, 546, 527, 614, 498 (whole complex included), 492 and the palaeontological site identified in Almond 2017 (see Appendix 3 of this report).



Figure 39: Two archaeological sites (red shaded polygons) that should be avoided at the western end of the study area. Note that the northern one includes waypoints recorded by Halkett & Webley (2011), while the southern one lies within the development envelope for the proposed Sutherland on-site substation (assessed in a separate report, at waypoint 576).



Figure 40: Three archaeological sites that should be avoided near the eastern end of Alternative 1.



Figure 41: Three archaeological sites and one palaeontological site (red shaded polygons) that must be avoided in the north-eastern part of Alternative 2. The palaeontological site is the southernmost polygon. The brown line shows the route that must be followed by the service road in that area.

10. EVALUATION OF IMPACTS RELATIVE TO SUSTAINABLE SOCIAL AND ECONOMIC BENEFITS

Section 38(3)(d) requires an evaluation of the impacts on heritage resources relative to the sustainable social and economic benefits to be derived from the development.

This project will enable electricity produced by a renewable energy facility to enter the national grid. As such, it will be of economic benefit to the people of South Africa in that it will play a small part in the stabilisation of the grid and the provision of electricity to all. Although the project would not create long term employment, it will likely provide jobs during the construction phase.

11. CONSULTATION WITH HERITAGE CONSERVATION BODIES

This assessment is part of a Basic Assessment Process which will undergo the full legislated PPP. During this PPP, I&APs will have the opportunity to comment on aspects of the project, including the heritage assessment.

HWC, however, requires that the relevant municipality within the Western Cape Province be requested to provide comment on the HIA – there are no heritage conservation organisation registered in the area. The report was thus sent to the Laingsburg Municipality by email for comment. They responded on 27 June 2017 that they had no further comments to add. All email communications were submitted digitally with this application but the response email was as follows:

FW: HIAs for comment

From "Winnie Miles" <wmiles@laingsburg.gov.za> to jayson@asha-consulting.co.za and copy to spieterse@laingsburg.gov.za 08:08:14 AM

O You replied to this message on 27 June 2017 08:10:30 AM.



12. CONCLUSIONS

This assessment has found that the broader study area around the proposed power line routes and associated electrical infrastructure does contain some significant heritage resources. These include archaeological sites (mostly historical), palaeontological occurrences, graveyards and historical structures. Alternative 1 does not have any heritage sites on its alignment. Because the eastern part of Alternative 2 was routed by the heritage specialist especially to avoid significant heritage sites, it too should not impact on anything significant. However, a part of this route that is potentially sensitive could not be surveyed in the field. No heritage resources were found to lie directly within the proposed development footprint. It is noted that the Stone Age kraal complex (at waypoint 546) is bisected by an access road that might be used during the proposed development. The greater landscape, especially along the escarpment, is visually significant, but because it lies within a proposed REDZ the area is very likely to be devoted to renewable energy developments (some facilities are already scheduled for construction in 2017) and the proposed power line and associated electrical infrastructure would thus not be out of place.

Neither Alternative has any fatal flaws but Alternative 1 is preferred because its alignment is shorter and therefore it passes close to fewer heritage sites. Because there are few heritage sites located within close proximity of the alignments, the potential impacts to all types of heritage resources are of generally low significance before mitigation and very low significance after mitigation.

13. RECOMMENDATIONS

Because there are unlikely to be significant impacts to heritage resources it is recommended that the proposed development be authorised. However, the following conditions should be incorporated into the Environmental Authorisation:

- Any areas not yet surveyed should be examined by both an archaeologist and a palaeontologist in order to identify any areas or sites that should be protected or mitigated prior to commencement of construction (this includes parts of the assessed alignments or any alterations made after completion of this report);
- The ECO should be aware of the potential for fossils to be uncovered during excavations. As many excavations as possible should be monitored by the ECO during construction and if any fossils are uncovered they should be protected *in situ* and immediately reported to a palaeontologist in order to plan a way forward;
- The farm road passing through the kraal complex at waypoint 546 may not be widened towards the east and should preferably not be widened at all;
- Significant palaeontological and archaeological sites as listed in this report should be identified on project maps and regarded as no-go zones with buffers of at least 30 m around all associated features (the exception is the service road diversion which comes within 20 m of the rock art site but uses an existing farm track);
- These no-go sites should be examined periodically by the ECO during the construction phase to ensure that they are being respected; and
- If any archaeological material, palaeontological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist or palaeontologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

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APPENDIX 1 – Curriculum Vitae



Curriculum Vitae

Jayson David John Orton

ARCHAEOLOGIST AND HERITAGE CONSULTANT

Contact Details and personal information:

Address:	6A Scarborough Road, Muizenberg, 7945
Telephone:	(021) 788 8425
Cell Phone:	083 272 3225
Email:	jayson@asha-consulting.co.za
Birth date and place:	22 June 1976, Cape Town, South Africa
Citizenship:	South African
ID no:	760622 522 4085
Driver's License:	Code 08

Married to Carol Orton

English and Afrikaans

Education:

Marital Status:

Languages spoken:

SA College High School University of Cape Town	Matric B.A. (Archaeology, Environmental & Geographical Science)	1994 1997
University of Cape Town	B.A. (Honours) (Archaeology)*	1998
University of Cape Town	M.A. (Archaeology)	2004
University of Oxford	D.Phil. (Archaeology)	2013

*Frank Schweitzer memorial book prize for an outstanding student and the degree in the First Class.

Employment History:

Spatial Archaeology Research Unit, UCT	Research assistant	Jan 1996 – Dec 1998
Department of Archaeology, UCT	Field archaeologist	Jan 1998 – Dec 1998
UCT Archaeology Contracts Office	Field archaeologist	Jan 1999 – May 2004
UCT Archaeology Contracts Office	Heritage & archaeological consultant	Jun 2004 – May 2012
School of Archaeology, University of Oxford	Undergraduate Tutor	Oct 2008 – Dec 2008
ACO Associates cc	Associate, Heritage & archaeological consultant	Jan 2011 – Dec 2013
ASHA Consulting (Pty) Ltd	Director, Heritage & archaeological consultant	Jan 2014 –

Memberships and affiliations:

South African Archaeological Society Council member	2004 –
Assoc. Southern African Professional Archaeologists (ASAPA) member	2006 –
ASAPA Cultural Resources Management Section member	2007 –
UCT Department of Archaeology Research Associate	2013 –
Heritage Western Cape APM Committee member	2013 –
UNISA Department of Archaeology and Anthropology Research Fellow	2014 –
Fish Hoek Valley Historical Association	2014 –

ASAPA membership num	ber: 233, CRM Section member
Principal Investigator:	Coastal shell middens (awarded 2007)
	Stone Age archaeology (awarded 2007)
	Grave relocation (awarded 2014)
Field Director:	Rock art (awarded 2007)
	Colonial period archaeology (awarded 2007)

Fieldwork and project experience:

Extensive fieldwork as both Field Director and Principle Investigator throughout the Western and Northern Cape, and also in the western parts of the Free State and Eastern Cape as follows:

Phase 1 surveys and impact assessments:

- Project types
 - o Notification of Intent to Develop applications (for Heritage Western Cape)
 - Heritage Impact Assessments (largely in the Environmental Impact Assessment or Basic Assessment context under NEMA and Section 38(8) of the NHRA, but also self-standing assessments under Section 38(1) of the NHRA)
 - o Archaeological specialist studies
 - o Phase 1 test excavations in historical and prehistoric sites
 - Archaeological research projects
- Development types
 - o Mining and borrow pits
 - o Roads (new and upgrades)
 - o Residential, commercial and industrial development
 - o Dams and pipe lines
 - o Power lines and substations
 - o Renewable energy facilities (wind energy, solar energy and hydro-electric facilities)

Phase 2 mitigation and research excavations:

- ESA open sites
 - o Duinefontein, Gouda
- MSA rock shelters
 - Fish Hoek, Yzerfontein, Cederberg, Namaqualand
- MSA open sites
 - o Swartland, Bushmanland, Namaqualand
- LSA rock shelters
 - o Cederberg, Namaqualand, Bushmanland
- LSA open sites (inland)
 - o Swartland, Franschhoek, Namaqualand, Bushmanland
- LSA coastal shell middens
 - Melkbosstrand, Yzerfontein, Saldanha Bay, Paternoster, Dwarskersbos, Infanta, Knysna, Namagualand
- LSA burials
 - o Melkbosstrand, Saldanha Bay, Namaqualand, Knysna
- Historical sites

0

- Franschhoek (farmstead and well), Waterfront (fort, dump and well), Noordhoek (cottage), variety of small excavations in central Cape Town and surrounding suburbs
- Historic burial grounds
 - o Green Point (Prestwich Street), V&A Waterfront (Marina Residential), Paarl

APPENDIX 2 – Mapping



Figure A2.1: Aerial view of the western part of the study area showing the recorded waypoints along Alternative 1. The yellow/pink line indicates the power line routing and the red numbered symbols are waypoints. The green lines are survey tracks.



Figure A2.2: Aerial view of the eastern part of Alternative 1. The yellow/pink line indicates the power line routing and the red numbered symbols are waypoints. The green lines are survey tracks.



Figure A2.3: Aerial view of the eastern part of Alternative 2. The pink line indicates the power line routing and the red numbered symbols are waypoints. The green lines are survey tracks.



Figure A2.4: Aerial view of the historic farm complex around waypoint 498.



Figure A2.5: Aerial view of the historic farm outpost around waypoint 614.

APPENDIX 3 – Palaeontological study

Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility, Northern and Western Cape Provinces

John E. Almond PhD (Cantab.) Natura Viva cc, PO Box 12410 Mill Street, Cape Town 8010, RSA naturaviva@universe.co.za February 2017 (and updated in May 2017)

EXECUTIVE SUMMARY

South Africa Mainstream Renewable Power Developments (Pty) Ltd are proposing to connect the authorised Rietrug Wind Energy Facility (WEF), situated some 35 km southeast of Sutherland, to the national grid. The proposed electrical grid infrastructure spans the boundary between the Western and Northern Cape Provinces and will comprise an on-site substation (including an operations and maintenance building as well as laydown areas) on the farm Beeren Valley 150, a new 132 kV distribution line from the on-site substation to the third party substation together with a service road beneath the powerline. Two distribution line route options are currently being considered. Alternative 1 would connect the proposed Rietrug on-site substation with the proposed Suurplaat On-site Substation on Farm Hartebeeste Fontein 147 while Alternative 2 would connect the Rietrug on-site substation to the Nuwerust Substation on Farm Hamelkraal 16 (Fig. 1).

The electrical grid connection study area extends from the Roggeveld Plateau eastwards into the western Koup region at the foot of the Besemgoedberg Escarpment, to the west of Merweville. It is entirely underlain by continental sediments of the Abrahamskraal Formation (Lower Beaufort Group) of Middle Permian age. This fluvial and lacustrine succession is generally assigned a high palaeontological sensitivity due to its rich fossil biota including pareiasaur reptiles, a wide range of therapsids, fish, amphibians, petrified wood and other remains of the *Glossopteris* Flora as well as trace fossils and microfossils. The Palaeozoic sedimentary bedrocks are extensively covered by Late Caenozoic superficial sediments (*e.g.* scree, gravelly soils) that are usually unfossiliferous.

Fossil material recorded from the Abrahamskraal Formation during a six-day field-based survey of the broader study region between Sutherland and Merweville includes sparsely-scattered, and often highly weathered, bones of unidentified robust-bodied tetrapods (probably pareiasaurs and / or dinocephalians) with only one well-articulated post-cranial skeleton. Trace fossils include several tetrapod burrow casts, lungfish burrows and low-diversity invertebrate trace assemblages. An extensive surface scatter of petrified wood blocks, some of which are well-preserved, was located in the western Koup. With the exception of the articulated skeleton and petrified wood scatter, most of these fossil occurrences are of limited palaeontological value and lie well away from the electrical infrastructure footprint (Fig. 1) and do not warrant mitigation. No significant fossil remains were recorded at the proposed on-site substation and third-party substation sites. The overall palaeontological sensitivity of the electrical grid infrastructure study area is rated as low.

Pending a proposed pre-construction palaeontological walk-down of those sectors of the finally chosen powerline route that have yet to be assessed in the field (See Fig. 1), the impact significance of the construction phase of the proposed electrical grid infrastructure for the Rietrug WEF is assessed as VERY LOW (negative) in terms of palaeontological heritage resources. This is a consequence of (1) the paucity of irreplaceable, unique or rare fossil remains within or close to the development footprint as well as (2) the extensive superficial sediment cover overlying most potentially-fossiliferous bedrocks here. This assessment applies equally to the various substation sites and alternative powerline routes currently under consideration. Significant further impacts during the operational and de-commissioning phases of the electrical grid infrastructure are not anticipated. There are no preferences on palaeontological heritage grounds for any particular layout among the various substation and powerline route options under consideration. The no-go alternative (*i.e.* no development) will probably have a low (neutral) impact on palaeontological heritage.

Cumulative impacts on palaeontological heritage resources that are anticipated as a result of alternative energy or other developments currently proposed or authorised for the Roggeveld Plateau – western Koup region cannot be assessed realistically at this stage. This is mainly because field-based palaeontological assessments for the most relevant wind farm projects *i.e.* the Sutherland, Sutherland 2, Rietrug and Suurplaat WEFs - have not yet been carried out. This region of the SW Karoo remains very poorly-known palaeontologically, while recent fieldwork for the present WEF electrical infrastructure projects shows that important fossil material, including articulated vertebrate skeletons, tetrapod burrows and well-preserved fossil wood, may be found here. It is therefore imperative that the pre-construction palaeontological studies for the various relevant Sutherland WEFs are followed through, as required by the South African Heritage Resources Agency (SAHRA) (Case ID 9622, Interim Comment of 5 July 2016).

There are no fatal flaws in the Rietrug WEF electrical grid connection infrastructure development proposals as far as fossil heritage is concerned. *Provided that* the recommendations for palaeontological monitoring and mitigation outlined below (See also Section 5 of this report) are followed through, there are no objections on palaeontological heritage grounds to authorisation of the proposed on-site substation (including the laydown area and operation and maintenance (O&M) Building), 132 kV powerline, service road and connection to a third-party substation. Pending the potential discovery of substantial new fossil remains during the proposed preconstruction walk-down of unstudied powerline sectors or during the construction phase itself, no specialist palaeontological mitigation is recommended for this project.

A 30-m wide buffer zone is proposed to safeguard the petrified wood surface scatter on Hamel Kraal 16 (Locs. 041-074, Figs. 1 & 48) during the construction phase.

The Environmental Control Officer (ECO) responsible for the Rietrug WEF electrical grid connection developments should be made aware of the potential occurrence of scientifically-important fossil remains within the development footprint. During the construction phase all major clearance operations (*e.g.* for new access roads, laydown areas, pylon footings) and deeper (> 1 m) excavations should be monitored for fossil remains on an on-going basis by the ECO. Should substantial fossil remains - such as vertebrate bones and teeth, or petrified logs of fossil wood - be encountered at surface or exposed during construction, the ECO should safeguard these, preferably *in situ*. They should then alert the relevant provincial heritage management authority as soon as possible - *i.e.* Heritage Western Cape for the Western Cape (Contact details: Protea

Assurance Building, Green Market Square, Cape Town 8000. Private Bag X9067, Cape Town 8001. Tel: 086-142 142. Fax: 021-483 9842. Email: hwc@pgwc.gov.za) and SAHRA for the Northern Cape (Contact details: Dr Ragna Redelstorff, SAHRA, P.O. Box 4637, Cape Town 8000. Tel: 021 202 8651. Email: rredelstorff@sahra.org.za). This is to ensure that appropriate action - *i.e.* recording, sampling or collection of fossils, *plus* recording of relevant geological data - can be taken by a professional palaeontologist at the developer's expense.

These mitigation recommendations should be incorporated into the Environmental Management Programme (EMPr) for the electrical grid connection project and be included as conditions for its authorization. Please note that:

- All South African fossil heritage is protected by law (South African Heritage Resources Act, Act 25 of 1999) and fossils cannot be collected, damaged or disturbed without a permit from SAHRA (N. Cape) or other relevant Provincial Heritage Resources Agency (*e.g.* Heritage Western Cape for the Western Cape);
- The palaeontologist concerned with potential mitigation work will need a valid fossil collection permit from Heritage Western Cape (HWC) (W. Cape) / SAHRA (N. Cape) and any material collected would have to be curated in an approved depository (*e.g.* museum or university collection); and
- All palaeontological specialist work should conform to international best practice for palaeontological fieldwork and the study (*e.g.* data recording fossil collection and curation, final report) should adhere as far as possible to the minimum standards for Phase 2 palaeontological studies developed by HWC (2016) and SAHRA (2013).

1. INTRODUCTION

1.1. Project Outline and Brief

South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream) are proposing to build electrical grid infrastructure in order to connect the authorised Rietrug Wind Energy Facility (WEF), situated some 35 km southeast of Sutherland, to the national grid. The proposed electrical grid infrastructure spans the boundary between the Western and Northern Cape Provinces and will comprise the following main components (See satellite map Fig. 1):

- On-site substation (including an O&M building as well as laydown areas) to be situated on the farm Beeren Valley 150/Remaining Extent.
- 132 kV distribution line from the proposed on-site substation to the third party substation, as well as a connection to the third party substation. Two options for the third party substation are under consideration: the proposed 132 kV Suurplaat On-site Substation to be located on Farm Hartebeeste Fontein 147 and the proposed 400 kV Eskom Main Transmission Substation (Eskom Nuwerust Substation, for which a separate Environmental Impact Assessment (EIA) process is being undertaken) to be located on Farm Hamelkraal 16. Two distribution line route options are currently being considered (See Fig. 1). Alternative 1 would connect the on-site substation with the Suurplaat On-site Substation while Alternative 2 would connect the on-site substation to the Nuwerust Substation.
- Service road below the powerline (4-6 m wide).

The purpose of the present report is to provide a palaeontological heritage Basic Assessment of the proposed electrical grid infrastructure for the Rietrug WEF. This report has been commissioned on behalf of the developer by the CSIR – Environmental Management Services, Durban (Contact details: Ms Rohaida Abed, CSIR. PO Box 17001, Congella, Durban 4013. Tel: 031 242 2300. Fax: 031 261 2509. E-mail: RAbed@csir.co.za). It will contribute to the consolidated Heritage Basic Assessment for the development that is being compiled by Dr Jason Orton (ASHA Consulting (Pty) Ltd. Tel: 021 788 8425. Cell: 083 272 3225. E-mail: jayson@asha-consulting.co.za).

Both of the alternative third party substations form part of the Moyeng Energy (Pty) Ltd Suurplaat WEF that has already received environmental authorisation. It is noted here that both the Suurplaat WEF as well as the original Mainstream Sutherland WEF (now split into the Sutherland, Sutherland 2 and Rietrug WEFs) have not yet been subjected to a full, field-based palaeontological heritage assessment. In all cases a pre-construction palaeontological field survey of the land parcels involved was recommended in the pre-scoping desktop assessment (Almond 2010b, 2010c). A pre-construction palaeontological walk-down of the final project footprint of the Sutherland, Sutherland 2 and Rietrug WEFs has now been required by the South African Heritage Resources Agency (SAHRA) (Case ID 9622, Interim Comment of 5 July 2016).

1.2. Legislative context for palaeontological assessment studies

The present combined desktop and field-based palaeontological heritage report contributes to the Heritage Basic Assessment for the proposed electrical grid infrastructure and falls under the South

African Heritage Resources Act (Act No. 25 of 1999). It will also inform the Environmental Management Programme (EMPr) for this Project.

The various categories of heritage resources recognised as part of the National Estate in Section 3 of the National Heritage Resources Act include, among others:

- geological sites of scientific or cultural importance;
- palaeontological sites; and
- palaeontological objects and material, meteorites and rare geological specimens.

According to Section 35 of the National Heritage Resources Act, dealing with archaeology, palaeontology and meteorites:

- (1) The protection of archaeological and palaeontological sites and material and meteorites is the responsibility of a provincial heritage resources authority.
- (2) All archaeological objects, palaeontological material and meteorites are the property of the State.
- (3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.
- (4) No person may, without a permit issued by the responsible heritage resources authority—
 - (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
 - (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
 - (c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or
 - (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.
- (5) When the responsible heritage resources authority has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may—
 - (a) serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order;
 - (b) carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary;
 - (c) if mitigation is deemed by the heritage resources authority to be necessary, assist the person on whom the order has been served under paragraph (a) to apply for a permit as required in subsection (4); and
 - (d) recover the costs of such investigation from the owner or occupier of the land on which it is believed an archaeological or palaeontological site is located or from

the person proposing to undertake the development if no application for a permit is received within two weeks of the order being served.

Minimum standards for the palaeontological component of heritage impact assessment reports (PIAs) have been published by SAHRA (2013).

1.3. Approach to the palaeontological heritage study

The approach to a Phase 1 palaeontological heritage study is briefly as follows. Fossil bearing rock units occurring within the broader study area are determined from geological maps and satellite images. Known fossil heritage in each rock unit is inventoried from scientific literature, previous assessments within the broader study region, and the author's field experience and palaeontological database. Based on this data as well as field examination of representative exposures of all major sedimentary rock units present in the vicinity of the development footprint as well as further afield, the impact significance of the proposed development is assessed with recommendations for any further studies or mitigation to be incorporated into the EMPr.

1.4. Assumptions & limitations

The accuracy and reliability of palaeontological specialist studies as components of heritage impact assessments are generally limited by the following constraints:

- 1. Inadequate database for fossil heritage for much of the RSA, given the large size of the country and the small number of professional palaeontologists carrying out fieldwork here. Most development study areas have never been surveyed by a palaeontologist.
- 2. Variable accuracy of geological maps which underpin these desktop studies. For large areas of terrain these maps are largely based on aerial photographs alone, without ground-truthing. The maps generally depict only significant ("mapable") bedrock units as well as major areas of superficial "drift" deposits (alluvium, colluvium) but for most regions give little or no idea of the level of bedrock outcrop, depth of superficial cover (soil *etc*), degree of bedrock weathering or levels of small-scale tectonic deformation, such as cleavage. All of these factors may have a major influence on the impact significance of a given development on fossil heritage and can only be reliably assessed in the field.
- 3. Inadequate sheet explanations for geological maps, with little or no attention paid to palaeontological issues in many cases, including poor locality information.
- 4. The extensive relevant palaeontological "grey literature" in the form of unpublished university theses, impact studies and other reports (*e.g.* of commercial mining companies) that is not readily available for desktop studies.
- 5. Absence of a comprehensive computerized database of fossil collections in major RSA institutions which can be consulted for impact studies. A Karoo fossil vertebrate database is now accessible for impact study work.

In the case of palaeontological desktop studies without supporting Phase 1 field assessments these limitations may variously lead to either:

- a) *underestimation* of the palaeontological significance of a given study area due to ignorance of significant recorded or unrecorded fossils preserved there, or
- b) *overestimation* of the palaeontological sensitivity of a study area, for example when originally rich fossil assemblages inferred from geological maps have in fact been destroyed by tectonism or weathering, or are buried beneath a thick mantle of unfossiliferous "drift" (soil, alluvium *etc*).

Since most areas of the RSA have not been studied palaeontologically, a palaeontological desktop study usually entails *inferring* the presence of buried fossil heritage within the study area from relevant fossil data collected from similar or the same rock units elsewhere, sometimes at localities far away. Where substantial exposures of bedrocks or potentially fossiliferous superficial sediments are present in the study area, the reliability of a palaeontological impact assessment may be significantly enhanced through field assessment by a professional palaeontologist.

In the case of the Rietrug WEF electrical grid infrastructure study area near Sutherland in the Western and Northern Cape preservation of potentially fossiliferous bedrocks is favoured by the semi-arid climate and sparse vegetation but bedrock exposure is limited by extensive superficial deposits, especially in areas of low relief, as well as pervasive Karoo *bossieveld* vegetation (*e.g.* Roggeveld Shale Renosterveld on the Roggeveld Plateau). However, sufficient bedrock exposures were examined during the course of this study (See Appendix) to assess the palaeontological heritage sensitivity of the majority of the study area. Comparatively few academic palaeontological studies or field-based fossil heritage impact studies have been carried out in the region, so any new data from impact studies here are of scientific interest.

Due to access issues during fieldwork, it was not possible to assess certain portions of the powerline route alternatives including the area near Novavita farmstead on farm Rheebokkenfontein 4 (See yellow dashed rectangle in Fig. 1). Depending on the powerline route finally selected, a pre-construction palaeontological field survey of the relevant unstudied area is therefore recommended here.

Project areas for both the Moyeng Energy (Pty) Ltd Suurplaat WEF as well as the original Mainstream Sutherland WEF have not yet been subjected to a full, field-based palaeontological heritage assessment. In all cases a pre-construction palaeontological field survey of the land parcels involved was recommended in the pre-scoping desktop assessment (Almond 2010b, 2010c). It was therefore not possible to take into consideration palaeontological field data for these large and highly relevant areas for the associated electrical grid infrastructure palaeontological assessment. A pre-construction walk-down of the final WEF development footprints has now been required by SAHRA (Case No. 9622, Interim Comment of 5 July 2016).

1.5. Information sources

The present combined desktop and field-based palaeontological study was largely based on the following sources of information:

- 1. A detailed project outline supplied by the CSIR– Environmental Management Services.
- 2. Relevant geological maps and sheet explanations (*e.g.* Theron 1983, Cole & Vorster 1999) as well as Google earth© satellite imagery.
- 3. Several palaeontological heritage assessment reports by the present author for proposed developments in the Karoo region between Sutherland and Merweville, including a golf course at Sutherland (Almond 2005), the Eskom Gamma Omega 765 kV transmission line running across the Moordenaars Karoo and Koup region (Almond 2010a) and several alternative energy facilities (Almond 2010b, 2010c, 2011, 2014, 2015a 2015i, 2016a, 2016b). These last reports notably include field-based assessments for the separate Gunsfontein WEF (Almond 2015g) as well as pre-scoping desktop assessments for the Mainstream Sutherland WEF (Almond 2010c) and Suurplaat WEF (Almond 2010b).
- A six-day palaeontological field assessment of the broader Sutherland WEF electrical grid infrastructure study area, including the access road to the north from Sutherland (29 Nov – 2 December 2016 and 1-2 February 2017) by the author and an experienced assistant.
- 5. The author's previous field experience with the formations concerned and their palaeontological heritage (*cf* Almond & Pether 2008 and references listed above).

GPS data for all numbered palaeontological localities mentioned in the text are provided in the Appendix.


Figure 1 (previous page). Google earth© satellite image of the Rietrug WEF Electrical Grid Infrastructure study area showing powerline route Alternative 1 (yellow) and Alternative 2 (red). Numbered flags represent recorded fossil sites (See Appendix for GPS data and short descriptions). Note that no fossil sites were recorded within the substation site study areas. The majority of the recorded fossil sites are of low palaeontological heritage significance and do not require mitigation. The only exceptions lying close to or within the alternative 132 kV powerline routes are Locs. 044-045 (surface scatter of fossil wood, bones) that are indicated by the red arrow. A 30 m-wide buffer zone is proposed for this site cluster (See Fig. 48 for more detail). The powerline sector within the yellow dashed rectangle has not yet been assessed in the field due to access issues. Depending on the powerline route finally selected, a pre-construction palaeontological field survey of the unsurveyed areas is therefore recommended here. A short deviation between the Alternative 2 powerline and its service road on Farm Hamel Kraal 16 (pea-green polygon in the far east) is not shown here and is likewise of very low palaeontological heritage significance.



Figure 2. Flat-lying, sandy terrain with no bedrock exposure in the development area for the proposed Sutherland 2 on-site substation (which is the subject of a separate Basic Assessment Process), Portion 1 of Tonteldoosfontein Farm 152.



Figure 3. Abrahamskraal Formation bedrocks exposed along a shallow incised drainage line on Gunstfontein 151 with Salpeterkop in the distance to the north.



Figure 4. Flat sandy terrain with sparse surface gravels of sandstone seen in the development area for the proposed Suurplaat On-site Substation, Hartebeeste Fontein Farm 147.



Figure 5. Gently undulating terrain of the Roggeveld Plateau bordering the Suurplaat On-site Substation study area with rocky ridges of Abrahamskraal Formation channel sandstones in the foreground.



Figure 6. Typical rubble-strewn terrain underlain by thick Abrahamskraal Formation channel sandstones on the Roggeveld Plateau, Hartebeeste Fontein Farm 147.



Figure 7. Laterally extensive, tabular channel sandstones of the Moordenaars Member (Abrahamskraal Formation) weathering out as narrow *kranzes* on the slopes of Louwskop, Farm 219.



Figure 8. View north-eastwards along the upper part of the Besemgoedberg Escarpment close to Blouval (Farm 219). The sandstone-rich Moordenaars Member (MM, along ridge crest) is separated from the Koornplaats Member (KM, closely-spaced lower sandstones) by a sandstone-poor zone, the Swaerskraal Member (SM).



Figure 9. View southwards from the Langpunt track showing yellowish channel sandstones of the Koornplaats Member overlying the dark grey, mudrock-dominated Leeuvlei Member at the foot of the Besemgoedberg Escarpment near Novavita (Farm 280/RE).



Figure 10. Typical exposure of grey-green overbank mudrocks and yellowish channel sandstones of the Koornplaats Member at Brewelskop (Hamelkraal Farm 16), western Koup region.



Figure 11. Flat terrain mantled by alluvial sands and silts to the SE of Bakenkop, Hamelkraal Farm 16. This is the development area for the proposed Nuwerust Substation (This will be subject to a separate EIA process).

2. GEOLOGICAL CONTEXT

The combined study area for the Rietrug WEF powerlines and associated substations comprises a narrow, west-east trending band of semi-arid Karoo terrain some 50 km long (W-E) and c. 15 km wide (N-S), spanning the boundary between the Northern and Western Cape (Fig. 1). The western 30 km of the area is situated on the Roggeveld Plateau at elevations of between 1500 and 1600 m amsl. The terrain here is rugged but without major contrasts in elevation, featuring numerous low sandstone ridges but only a few, low koppies such as Bakenkop (1560 m amsl.) and Louwskop (1670 ma amsl), rising to its greatest height close to the escarpment edge (Boesmanskop 1715) (Figs. 2 to 7). This western portion of the study area, to the north of the south-facing Komsberg Escarpment, has only a few, minor, northeast-directed drainage lines (e.g. Portugalsrivier). Several of these lie along well-defined radial fractures associated with the Late Cretaceous intrusion and uplift of the Sutherland Suite (e.g. Salpeterkop volcanic complex) (See NW portion of Fig. 1). The eastern 20 km or so of the study area, from Blouval on Hartebeeste Fontein Farm 147 eastwards to Novavita Farmstead on Farm Rheebokkenfontein 4 descends the steep, east-facing Besemgoedberg Escarpment between Lammerberg and Rooiberg, with a fall of some 600 m in altitude along the Langpunt track. The scenically spectacular escarpment zone features numerous, ridge-like sandstone *kranzes* and is dissected by several deeply-incised *klowe* (stream gorges) (Figs. 8 & 9). To the east of Novavita Farmstead the powerline routes enter the western Koup region to the west of Merweville, characterised by arid, gravelly vlaktes and low, stepped koppies such as Blikhuiskop (1150 m amsl.), Brandkop (1050 m amsl.) and Brewelskop (850 m amsl) (Figs. 10 & 11). This comparatively low-lying region (c. 700-750 m amsl) of the Great Karoo sensu stricto is drained by numerous intermittent-flowing tributaries of the Dwyka River such as the Juksrivier, Oubergsrivier and Vanwyksrivier. The karroid shrubby vegetation here is noticeably lower and sparser than seen in the less arid Roggeveld Plateau region to the west.

The geology of the Sutherland region is outlined on the 1: 250 000 scale geology sheet 3220 Sutherland (Theron 1983) (Fig. 14) as well as the updated 1: 250 000 Sutherland metallogenic map that includes important new stratigraphic detail for the Lower Beaufort Group succession (Cole & Vorster 1999) (cf Fig. 13). The study area is entirely underlain by Middle Permian continental sediments of the Lower Beaufort Group (Adelaide Subgroup, Karoo Supergroup), and in particular the Abrahamskraal Formation (Pa) at the base of the Lower Beaufort Group succession (Johnson et al. 2006 and references cited below). The Beaufort Group sediments here are folded along numerous west-east trending fold axes (narrow black lines on geological map, Fig. 14). In the Sutherland area to the north of the Rietrug WEF powerline study area the Lower Beaufort Group sediments have been extensively intruded and thermally metamorphosed (baked) by dolerite sills and dykes of the Karoo Dolerite Suite of Early Jurassic age (c. 182 Ma = million years ago; Duncan & Marsh 2006). These igneous rocks were intruded during an interval of crustal uplift and stretching that preceded the break-up of the supercontinent Gondwana. They show up on satellite images as rusty-brown areas (Fig. 1). No dolerite or younger (Cretaceous) intrusions are mapped within the present study region, however; major dolerite and younger Cretaceous igneous bodies of the **Sutherland Suite** (e.g. Salpeterkop) intrude the Lower Beaufort Group some 6 to 12 km to the north. The Palaeozoic bedrocks in the study area are extensively overlain by Late Caenozoic superficial deposits such as scree and other slope deposits (colluvium and hillwash), stream alluvium, down-wasted surface gravels, calcretes and various sandy to gravelly soils.

A useful recent overview of the Beaufort Group continental succession has been given by Johnson *et al.* (2006). Almond (2015g) has provided a short account of the Lower Beaufort Group sediments of the Roggeveld plateau to the south of Sutherland that is broadly applicable to the

present WEF powerline study area. The Lower Beaufort Group succession here belongs to the Abrahamskraal Formation. This is a very thick (c. 2.5 km) succession of fluvial deposits laid down in the Main Karoo Basin by meandering rivers on an extensive, low-relief floodplain during the Middle Permian Period, some 266-260 million years ago (Rossouw & De Villiers 1952, Johnson & Keyser 1979, Turner 1981, Theron 1983, Smith 1979, 1980, 1990, 1993a, 1993b, Smith & Keyser 1995a, Loock et al., 1994, Cole & Vorster 1999, McCarthy & Rubidge 2005, Johnson et al., 2006, Almond 2010a, Day 2013a, Day & Rubidge 2014, Wilson et al. 2014). These sediments include (a) lenticular to sheet-like channel sandstones, often associated with thin, impersistent intraformational breccio-conglomerates (larger clasts mainly of reworked mudflakes, calcrete nodules, plus sparse rolled bones, teeth, petrified wood), (b) well-bedded to laminated, greygreen, blue-grey to purple-brown floodplain mudrocks with sparse to common pedocrete horizons (calcrete nodules formed in ancient soils), (c) thin, sheet-like crevasse-splay sandstones, as well as more (d) localized playa lake deposits (e.g. wave-rippled sandstones, laminated mudrocks, limestones, evaporites). A number of greenish to reddish weathering, silica-rich "chert" horizons are also found. Many of these appear to be secondarily silicified mudrocks or limestones but at least some contain reworked volcanic ash (tuffs, tuffites). A wide range of sedimentological and palaeontological observations point to deposition under seasonally arid climates. These include, for example, the abundance of pedogenic calcretes and evaporites (silicified gypsum pseudomorphs or "desert roses"), reddened mudrocks, sun-cracked muds, "flashy" river systems, sun-baked fossil bones, well-developed seasonal growth rings in fossil wood, rarity of fauna, and little evidence for substantial bioturbation or vegetation cover (e.g. root casts) on floodplains away from the river banks.

The Abrahamskraal Formation in the SW Karoo has been subdivided by various authors into a series of alternating sandstone- and mudrock-dominated packages, most recently by Day and Rubidge (2014) (Fig. 12). According to the 1: 250 000 metallogenic map of Cole and Vorster (1999) the majority of the WEF powerline study area up on the Roggeveld Plateau near Sutherland is underlain by a thick, channel sandstone-rich package known as the **Moordenaars Member** (Fig. 7) (Mudrocks of the overlying Kareskraal Member, the youngest subunit of the Abrahamskraal Formation, crop out just to the north of, but not within, the present study area. They are indicated by darker, purple-brown tints on satellite images; Fig. 1). An older package of closely-spaced, yellowish-tinted, tabular channel sandstone bodies exposed on the lower slopes of the Besemgoedberg Escarpment as well as over much of the western Koup region as far as Merweville represents the Koornplaats Member. This sandy unit underlies most of the eastern portion of the study area (Figs. 8 to 10). The thin mudrock-dominated interval between these two sandstone packages - visible, for example, from Blouval and the Langpunt track - belongs to the Wilgerbos Member (renamed the Swaerskraal Member by Day & Rubidge 2014) (Fig. 8). Dark mudrock successions with lenticular sandstone bodies exposed on lower valley slopes near Novavita Farmstead, along the foot of the escarpment, probably belong to the upper part of the Leeuvlei Member (Fig. 9).

According to Loock *et al.* (1994) the **Koornplaats Member** of the Abrahamskraal Formation. is characterized by:

 Yellow-weathering sheet-like channel sandstone packages with heavy mineral laminations (up to 2 cm thick) towards the top and basal lag breccio-conglomerates. A prominent, laterally-persistent package of five yellowish fine-grained sandstone units marks the upper part of the member in the Roggeveld – Nuweveld Escarpment area. The sandstones are associated with fossil tetrapod material and reworked plant material, including silicified wood (rarely with exotic extra-basinal pebbles) and *Vertebraria* glossopterid roots. Uranium mineralization may be associated with transported plant material.

• Grey and maroon overbank mudrocks with calcrete horizons, tetrapod fossils.

The **Wilgerbos / Swaerskraal Member** comprises some 120 m of recessive-weathering, grey-green to purple-brown mudrocks with subordinate thin sandstones. Extensive playa lake deposits have been recognized within this unit (Loock *et al.* 1994).

The **Moordenaars Member** is a 300-350 m – thick, sandstone-rich succession of continental fluvial rocks characterized by stacked sheet sandstones with intervening, more recessive-weathering mudrocks (Stear 1980, Le Roux 1985, Loock *et al.* 1994, Cole & Vorster 1999). The prominent, laterally-persistent sandstone ledges generate a distinctive terraced topography on hill slopes in the Sutherland area (Figs. 7 & 18). The sheet sandstones are generally pale-weathering (enhanced by epilithic lichens), fine-grained, and structured by horizontal lamination (flaggy, with primary current lineation) or tabular to trough cross-bedding. The tabular-laminated units often contain numerous dark, very thin, laterally persistent laminae composed of heavy minerals that suggest density sorting during high energy sheet-flow conditions. The lower contacts of the channel sandstones are erosive, with lenticular basal breccias that may infill small-scale erosive gullies. The breccias, which may also occur within the body of the channel sandstone unit, are composed of reworked mudflake intraclasts, small rounded to irregular calcrete glaebules or nodules as well as occasional rolled vertebrate bones, teeth and local concentrations of plant debris. Some of the originally more organic-rich breccias are associated with secondary iron / manganese-rich (*'koffieklip*") and uranium ore mineralization (Cole & Vorster 1999).



Figure 12. Revised stratigraphic subdivision of the Abrahamskraal Formation of Day and Rubidge (2014). The red bar indicates members that are represented within the Rietrug WEF powerline study area. Mudrock-dominated units are indicated in grey and sandstone packages by stippling.

Levels of tectonic deformation of the Lower Beaufort Group bedrocks within the study area are generally low. According to the 1: 250 000 Sutherland sheet map they have been gently folded along east-west or WNW-ESE fold axes (Fig. 14). In the study area the beds are fairly flat-lying with only local development of tectonic cleavage. A series of southwards down-stepping monoclinal folds with W-E trending axes is developed in the escarpment zone, visible for example to the N and NW of Novavita Farmstead.

Representative exposures of Abrahamskraal Formation bedrocks are illustrated below in Figures 15 to 22. Selected unconsolidated superficial deposits overlying these bedrocks are shown in Figures 23 and 24. Although lying outside the brief for the present palaeontological study, two small-scale geological features of geo-scientific interest encountered during the present field study are noted here:

- The unusually extensive occurrence of *koffieklip* (dark brown-patinated, ferruginised sandstone) spanning a dust road on Farm Hamel Kraal 16, situated some 1 km southeast of the proposed Nuwerust Substation (Loc. 084). Elongate lenticular outcrops of black, dolerite-like sandstone blocks extend some 200 m in a NW-SE direction and are possibly related to Mid Permian palaeochannels. A uranium anomaly has not been mapped at this site, and no associated fossil plant material was recorded here (but there are trace fossils; *cf* Figs. 17 & 47).
- The lenticular cluster of pebble- to cobble-sized exotic clasts ("lonestones") embedded within a succession of fine-grained, purple-brown mudrocks that is recorded on Nooitgedagt 148 (Loc. 540; Fig. 20) includes some of the largest extra-basinal clasts recorded from the Lower Beaufort Group in the SW Karoo (*cf* Almond 2010a, 2015h and refs. therein). The larger clasts appear to be igneous (possibly andesite) and show a modest degree of rounding; the smaller pebbles are well-rounded. It is notable that the megaclasts are associated with crumbly, weathered, dark tillite-like material, suggesting a possible re-exhumed Dwyka Group provenance along the Karoo Basin margin (or alternatively a gritty palaeosol). Plausible explanations as to how such exotic "lonestones" were introduced so far out into the Beaufort Group depository include transport on the roots of floating logs or by floating river ice during winter. In the present case the distal floodplain setting of the conglomeratic lens, far from a river channel, is noteworthy.

Furthermore, it is noted that several uranium anomalies are indicated on the 1: 250 000 Sutherland metallogenic map close to but not within the proposed 132 kV powerline route and onsite substation sites. They are situated on the farms Gunstfontein 151 and Beeren Valley 150 (Fig. 13). Co-ordinates for these anomalies are given in the sheet explanation by Cole and Vorster (1999). According to the Mineral and Petroleum Resources Development Act, 2002, the company proposing the wind farm developments on these properties is required to submit a report from the Council for Geoscience on the mineral potential of the development area to the Department of Mineral Resources (Dr Doug Cole, Council for Geoscience, Bellville, pers. comm. 2015). Uranium ore occurrences associated with *koffieklip* are sometimes associated with concentrations of fossil plant material (See discussion and references in Almond 2015g relating to the proposed Gunstfontein WEF). While significant palaeontological impacts are unlikely, as a precautionary measure, it is suggested that these sites are protected by a 30 m – radius buffer zone during the construction phase.



Figure 13. Extract from the 1: 250 000 Sutherland metallogenic map showing several uranium anomalies mapped on the farms Gunsfontein 151 and Beeren Valley 150 (red symbols) (Council for Geoscience, Pretoria). Anomalies 180, 181, 183 and 187 lie close to the proposed electrical grid infrastructure for the Sutherland, Sutherland 2 and Rietrug WEFs. Uranium ore occurrences within *koffieklip* (ferruginous sandstone) may sometimes be associated with fossil plant material, though this was not established during the present field study. As a precautionary measure, it is recommended that these sites are protected by a 30-m radius buffer zone. Palaeontological impacts at these sites due to the proposed electrical infrastructure development are considered unlikely.



Figure 14. Extract from 1: 250 000 geological sheet 3220 Sutherland (Council for Geoscience, Pretoria) showing the *approximate* footprint of the proposed Electrical Grid Infrastructure for the Rietrug WEF. The two alternative 132 kV powerline route options are shown in yellow (Alternative 1) and brown (Alternative 2). Note that the alternatives follow the same route up until a point on Farm Hartebeeste Fontein 147 where it separates towards the proposed Suurplaat Substation (Alternative 2). and the Eskom Nuwerust Substation (Alternative 2). Dashed portions of the powerlines have not been assessed in the field and require a pre-construction palaeontological walkdown if they are finally chosen.



Figure 15. Lenticular channel sandstones incised into dark grey mudrocks of the Leeuvlei Member at the base of the escarpment to the west of Novavita Farmstead.



Figure 16. Well-developed ferruginised basal channel breccia within the Koornplaats Member, Brewelskop, Hamel Kraal Farm 16 (Loc. 079) (Hammer = 30 cm). Such breccias are composed mainly of mudflakes and calcrete nodules but may also contain fossil wood, teeth and bones (*cf* Figs. 31, 35 and 45).



Figure 17. Unusually thick and extensive *koffieklip* lens (sandstone secondarily mineralised with iron and manganese minerals) within a channel sandstone of the Koornplaats Member, *c*. 1 km SE of the proposed Nuwerust Substation.



Figure 18. Package of closely-spaced, sheet-like channel sandstones of the Moordenaars Member building the upper edge of the Besemgoedberg Escarpment near Blouval, Farm 219.



Figure 19. Gentle hillslope exposure of purple-brown overbank siltstones within the upper part of the Moordenaars Member, Nooitgedagt Farm 148 (Loc. 540).



Figure 20. Exceptional concentration of pebble- to cobble-sized exotic clasts within finegrained mudrocks of the Mordenaars Member, Nooitgedagt 148 (Loc. 540. See previous figure). These are among the largest clasts recorded within the Lower Beaufort Group in the SW Karoo, possibly transported by floating tree roots.



Figure 21. Excellent stream gulley exposures of blue-grey overbank mudrocks of the Moordenaars Member on Nooitgedagt Farm 148. Tabular packages of thin-bedded mudrocks were deposited on the distal floodplain, perhaps within playa lakes.



Figure 22. Well-developed palaeosol horizon marked by dense pale grey pedogenic calcrete concretions, Moordenaars Member, Tonteldoosfontein Farm 152 (Hammer = 30 cm). Such horizons are a primary focus for recording vertebrate fossil remains.



Figure 23. Downwasted Abrahamskraal Formation sandstones forming rubbly surface gravels south of Brewelskop, Hamel Kraal 16 (Loc. 081).



Figure 24. Coarse stream gravels capped by sandy to silty alluvium exposed in the banks of the Brandleegte River west of Hamelkraal homestead.

3. PALAEONTOLOGICAL HERITAGE

The fossil record of the principal sedimentary rock units represented within the Rietrug WEF electrical grid infrastructure study region has been reviewed in previous palaeontological assessment reports for the region by Almond (2010b, 2010c, 2011, 2015g). In this section of the Basic Assessment report only a short summary of earlier finds is given, plus a brief illustrated account of new fossil records made during the recent field-based assessment of the study area.

3.1. Fossil biotas of the Lower Beaufort Group (Adelaide Subgroup)

The overall palaeontological sensitivity of the Beaufort Group sediments is high to very high (Almond & Pether 2008, SAHRIS website). These continental sediments have yielded one of the richest fossil records of land-dwelling plants and animals of Permo-Triassic age anywhere in the world (MacRae 1999, Rubidge 2005, McCarthy & Rubidge 2005, Smith *et al.* 2012). Bones and teeth of Late Permian tetrapods have been collected in the western Great Karoo region since at least the 1820s and this area remains a major focus of palaeontological research in South Africa.

A chronological series of mappable fossil biozones or assemblage zones (AZ), defined mainly on their characteristic tetrapod faunas, has been established for the Main Karoo Basin of South Africa (Rubidge 1995, 2005, Van der Walt *et al.* 2010). Maps showing the distribution of the Beaufort Group assemblage zones within the Main Karoo Basin have been provided by Keyser and Smith (1979, Fig. 25 herein) and Rubidge (1995, 2005). A recently updated version is now available (Nicolas 2007, Van der Walt *et al.* 2010). The assemblage zone represented within the present study area is the Middle Permian *Tapinocephalus* **Assemblage Zone** (Theron 1983, Rubidge 1995).

The main categories of fossils recorded within the *Tapinocephalus* fossil biozone (Keyser & Smith 1977-78, Anderson & Anderson 1985, Smith & Keyser 1995a, MacRae 1999, Rubidge 2005, Nicolas 2007, Almond 2010a, Smith *et al.* 2012, Day 2013a, Day 2013b, Day *et al.* 2015b) include:

- isolated petrified bones as well as rare articulated skeletons of tetrapods (*i.e.* airbreathing terrestrial vertebrates) such as true **reptiles** (notably large herbivorous pareiasaurs like *Bradysaurus* (Fig. 25), small insectivorous millerettids), rare pelycosaurs, and diverse **therapsids** or "mammal-like reptiles" (*e.g.* numerous genera of large-bodied dinocephalians, herbivorous dicynodonts, flesh-eating biarmosuchians, gorgonopsians and therocephalians) (Fig. 26);
- aquatic vertebrates such as large **temnospondyl amphibians** (*Rhinesuchus*, usually disarticulated), and **palaeoniscoid bony fish** (*Atherstonia*, *Namaichthys*, often represented by scattered scales rather than intact fish);
- freshwater **bivalves** (*Palaeomutela*);

- **trace fossils** such as worm, arthropod and tetrapod burrows and trackways, coprolites (fossil droppings) and plant stem or root casts;
- **vascular plant remains** (usually sparse and fragmentary), including leaves, twigs, roots and petrified woods (*"Dadoxylon"*) of the *Glossopteris* Flora, especially glossopterid trees and arthrophytes (horsetail ferns).

In general, tetrapod fossil assemblages in the *Tapinocephalus* Assemblage Zone are dominated by a wide range of dinocephalian genera and small therocephalians *plus* pareiasaurs while relatively few dicynodonts can be expected (Day & Rubidge 2010, Jirah & Rubidge 2010 and references therein). Vertebrate fossils in this zone are generally much rarer than seen in younger assemblage zones of the Lower Beaufort Group, with almost no fossils to be found in the lowermost beds (Loock *et al.* 1994) (Fig. 27).

Despite their comparative rarity, there has been a long history of productive fossil collection from the Tapinocephalus Assemblage Zone in the western and central Great Karoo area, as summarized by Rossouw and De Villiers (1952), Boonstra (1969) and Day (2013b). Numerous fossil sites recorded in the region are marked on the published 1: 250 000 Sutherland geology sheet 3220 (Fig. 14) but none of these sites lies within the alternative powerline routes. According to the vertebrate fossil distribution map of Keyser and Smith (1977-78; Fig. 25) there is a paucity of known sites within the present study area. Vertebrate fossils found in the Sutherland sheet area are also listed by Kitching (1977) as well as Theron (1983). They include forms such as the pareiasaur Bradysaurus, tapinocephalid and titanosuchid dinocephalians *plus* rarer dicynodonts, gorgonopsians and therocephalians (e.g. pristerognathids, Lycosuchus) as well as land plant remains (e.g. arthrophyte stems and leaves). Numerous fossil sites were recorded along the eastern edge of the Moordenaarskaroo in the key biostratigraphic study of the Abrahamskraal Formation by Loock et al. (1994). A palaeontological heritage study was carried out by the author within the Abrahamskraal Formation of the Moordenaarskaroo and Koup regions to the south and southeast of the present study area (Almond 2010a). This fieldwork yielded locally abundant dinocephalian and other therapsid skeletal remains, large, cylindrical vertical burrows or plant stem casts, Scoyenia ichnofacies trace fossil assemblages and sphenophytes (horsetail ferns) associated with probable playa lake deposits, as well as locally abundant petrified wood. An earlier palaeontological field assessment of Mordenaars Member rocks on the outskirts of Sutherland by Almond (2005) yielded only transported plant remains (arthrophytes including Phyllotheca, glossopterid and other, more strapshaped leaves, possible wood tool marks), sparse trace fossil assemblages of the dampground Scoyenia ichnofacies, and rare fragments of rolled bone. Reworked silicified wood from surface gravels, scattered, fragmentary plant remains associated with channel sandstones and rare disarticulated bones were reported by Almond (2011) from a Moordenaars Member study site c. 11 km south of Sutherland.



Figure 25. Distribution of vertebrate fossil localities within the Lower Beaufort Group in the south-western Karoo region (Map abstracted from Keyser & Smith 1977-78). Outcrop areas with a vertical lined ornament are assigned to the Middle Permian *Tapinocephalus* Assemblage Zone. Note the paucity of vertebrate fossil records from the lower part of the Abrahamskraal Formation in the Rietrug WEF electrical grid infrastructure study area between Sutherland and Merweville (red rectangle). This probably reflects palaeontological neglect more than an absence of fossil material.



Figure 26. Skulls of two key large-bodied tetrapods of the *Tapinocephalus* Assemblage Zone: A – the dinocephalian therapsid *Tapinocephalus*; B – the pareiasaur *Bradysaurus* (From Smith & Keyser 1995b).

A recent palaeontological field assessment of the Gunstfontein WEF study area (Almond 2015g), situated just to the west of the present WEF electrical infrastructure study area, yielded the following records of fossil material from the Abrahamskraal Formation bedrocks. All these records are from the Moordenaars Member on the Roggeveld Plateau and are representative of the categories and preservation styles of expected and observed fossil material within the present study area:

- Rare transported fossil bone fragments and probable disarticulated bony fish scales preserved within ferruginised basal channel breccias;
- Low diversity trace fossil assemblages of the *Scoyenia* ichnofacies on sandstone sole surfaces as well as treptichnid-like serial probe burrows associated with high energy sheet-laminated sandstone facies;
- Sandstone casts of reedy plants stems probably sphenophytes ("horsetails") within crevasse splay sandstones;
- Ferruginised or slightly dark-hued impressions of non-woody plant material, including occasional well-preserved, tongue-shaped glossopterid leaves showing midribs as well as indeterminate leaf and stem fragments, preserved within dark brown, impure sandstone facies;
- Local concentrations of woody plant material preserved as ferruginised moulds in channel sandstones, often associated with basal breccio-conglomerates and / or koffieklip;
- Sparse to locally common, poorly- to well-preserved blocks of silicified wood, including portions of sizeable logs, occurring among surface sandstone rubble,

downwasted surface gravels and sheetwash gravels. Much of this material has a pale yellowish to creamy, cherty, vuggy appearance with no obvious preservation of the original woody fabric and may represent wood that was silicified at a late stage of decomposition. However, some of the petrified wood fragments do show wellpreserved xylem cells.

Fossil records made during the present field assessment for the Rietrug WEF electrical grid infrastructure projects are tabulated with brief notes in the Appendix. The sites are indicated with reference to the alternative powerline routes under consideration on the Google earth© satellite map in Figure 1. The fossils found belong for the most part to the same categories as those listed above for the adjoining Gunsfontein WEF study area. For the purposes of the present palaeontological heritage basic assessment study, the following additional points should suffice here.

Disarticulated fossil bones, mainly of large-bodied tetrapods such as pareiasaurs and dinocephalians, are found widely, but usually very sparsely, at surface within the Abrahamskraal Formation outcrop area. Most of the specimens observed are fragmentary, highly weathered, secondarily ferruginised and, in some cases, rounded by transport (Figs. 32 & 39). Sun-cracked surface textures are commonly seen. Without associated skull material they are difficult to identify and for the most part of limited scientific value. The notable scatter of robust post-cranial bones observed within sandstone scree on Portugals Rivier 218 (Figs. 33 & 34) may belong to one or more individuals. The partially embedded, articulated post-cranial skeleton of a large tetrapod at Loc. 535 (Beeren Valley Farm 150) (Figs. 29 & 30) is of heritage conservation significance but will not be impacted by the present electrical infrastructure project.

Basal channel breccias in the Koornplaats and Moordenaars Members may be locally rich in transported woody plant material (often preserved as ferruginized moulds; Fig. 48) as well as reworked tetrapod remains. The latter include disarticulated, rounded bones and isolated teeth (Figs. 33 and 45), most of which are unidentifiable. The extensive scatter of petrified logs (mostly, but not all, poorly-preserved) seen at surface on Hamel Kraal Farm 16 (Locs. 041-074; Figs. 40 to 43) and the scarce associated bone fragments have probably weathered out of a local channel sandstone within the Koornplaats Member. Nearby *koffiklip* lenses contain occasional reworked bone (Fig. 44). This fossil scatter lies 500 m southwest of powerline route Alternative 2 and should be protected by a 30-m wide peripheral buffer zone (Fig. 48).

Probable sandstone casts of tetrapod burrows were observed at several localities, but in several cases their interpretation as such is equivocal (*cf* Fig. 38). The best examples include a concentration of several gently inclined, subcylindrical tetrapod burrow casts (*c*. 15 cm wide) embedded in maroon overbank mudrocks that were observed within the Karelskraal Member on Nooitgedagt 148 (Loc. 521). One of these burrows shows well-developed scratch marks on the ventrolateral surface (Fig. 28). These are among the youngest recorded tetrapod burrows within the Abrahamskraal Formation. They may well have been constructed by dicynodonts. Note that this stratigraphic horizon does not crop out within the 132 kV powerline study area itself. Other vertebrate traces of interest are dense arrays of subcylindrical sandstone casts of lungfish aestivation burrows (Loc. 512, Portugals Rivier

218) (Fig. 36). Similar vertical burrow assemblages have been recorded elsewhere in the SW Karoo at several localities and horizons within the Abrahamskraal Formation (*cf* Almond 2010a, Odendaal & Loock 2015).

The oblique, small-scale invertebrate burrow observed at Loc. 509 (Portugals Rivier 218; Fig. 35) is unusual in that the trace maker – possibly some sort of crustacean – had to burrow through a coarse, gravelly substrate. Other small-scale trace fossils observed include stem casts of reedy plants within sandstone beds and occasional low-diversity assemblages of straight to curving, cylindrical invertebrate burrows exposed at the surface or within channel sandstone bodies (Figs. 37 and 47).

Occurrences of sandstone-hosted uranium ore bodies picked up by aerial surveys of the Sutherland sheet area are often associated with fossil plant material and *koffieklip* (Almond 2015g). Decomposition of rotting plant material embedded within channel sandstones often played a key role in the precipitation of uranium minerals (See detailed discussion in Cole & Vorster 1999, Cole & Wipplinger 2001). It is therefore possible that the various uranium anomalies mapped close to the present WEF electrical grid infrastructure study area may be associated with fossil plants, though this particular point was *not* addressed during recent fieldwork and significant impacts here are considered to be unlikely. On palaeontological, as well as economic geological and general geoscientific, grounds it is therefore recommended that a 30 m - radius buffer zone be recognised around previously-identified uranium anomalies close to the powerline corridor that are mapped in Fig. 13.

3.2. Fossils within the superficial deposits

The diverse superficial deposits within the South African interior have been comparatively neglected in palaeontological terms. However, sediments associated with ancient drainage systems, springs and pans in particular may occasionally contain important fossil biotas, notably the bones, teeth and horn cores of mammals as well as remains of reptiles like tortoises (e.g. Skead 1980, Klein 1984b, Brink, J.S. 1987, Bousman et al. 1988, Bender & Brink 1992, Brink et al. 1995, MacRae 1999, Meadows & Watkeys 1999, Churchill et al. 2000, Partridge & Scott 2000, Brink & Rossouw 2000, Rossouw 2006). Other late Caenozoic fossil biotas that may occur within these superficial deposits include non-marine molluscs (bivalves, gastropods), ostrich egg shells, trace fossils (e.g. calcretised termitaria, coprolites, invertebrate burrows, rhizocretions), and plant material such as peats or palynomorphs (pollens) in organic-rich alluvial horizons (Scott 2000) and diatoms in pan sediments. In Quaternary deposits, fossil remains may be associated with human artefacts such as stone tools and are also of archaeological interest (e.g. Smith 1999 and references therein). Ancient solution hollows within extensive calcrete hardpans may have acted as animal traps in the past. As with coastal and interior limestones, they might occasionally contain mammalian bones and teeth (perhaps associated with hyaena dens) or invertebrate remains such as snail shells.

No fossils were observed within the various Late Caenozoic superficial deposits represented within the Rietrug WEF electrical grid infrastructure study area during the present field study.



Figure 27. Chart showing the subdivision of the Abrahamskraal Formation in the western Karoo region with the stratigraphic distribution of the major fossil vertebrate groups (Loock *et al.* 1994). The Rietrug WEF electrical grid infrastructure project area on the Roggeveld Plateau is largely underlain by sediments of the Mordenaars Member. Lower stratigraphic intervals are represented within the Besemgoedberg Escarpment zone and the low-lying Koup region to the east (See red dotted line).



Figure 28. Gently-inclined, curved tetrapod burrow cast within the Kareslkraal Member (Scale c. 15 cm long). Nooitgedagt 148 (Loc. 521). This is one of the youngest tetrapod burrows recorded from the Abrahamskraal Formation.



Figure 29. Partially-embedded, well-articulated postcranial skeleton of a large tetrapod, Beeren Valley 150 (Loc. 535) (Scale is *c*. 15 cm long). This specimen is of conservation value but will not be impacted by the present BA project.



Figure 30. Detail of the articulated skeleton seen in the preceding figure showing the attachment of several ribs along the backbone.



Figure 31. Sizeable disarticulated bone, preserved in part as a mould, embedded within a calcrete-rich breccia at the base of a channel sandstone, Moordenaars Member, Portugalsrivier 218 (Loc. 509) (Scale in cm and mm).



Figure 32. Several highly-weathered, secondarily ferruginised pieces of tetrapod bone found among surface float, Portugals Rivier 218 (Loc. 545) (Scale in cm). The limb bone on the left shows superficial sun-cracking due to protracted pre-burial exposure.



Figure 33. Sandstone scree on Portugals Rivier 218 with numerous dispersed fossil bones that may have weathered out of the channel sandstone above. Several fossil bones have been collected together in one spot (arrow) (Loc. 546).



Figure 34. Close-up of large tetrapod bones (pareiasaur or dinocephalian) shown in the previous figure (Loc. 546) (Scale *c*. 15 cm long). They may belong to one or more individuals but are difficult to identify without associated cranial material.



Figure 35. Fossiliferous basal channel breccia penetrated by an inclined invertebrate burrow – possibly crustacean, Moordenaars Member, Portugalsrivier 218 (Loc. 509) (Scale in cm).



Figure 36. Road cutting through interbedded thin sandstones and overbank mudrocks of the Moordenaars Member showing several cylindrical lungfish burrow casts up to 10 cm in diameter (arrowed), Portugals Rivier 218 (Loc. 512).



Figure 37. Upper surface of a Moordenaars Member channel sandstone with ill-defined horizontal burrows, Beeren Valley 150 (Loc. 530) (Scale is 15 cm long).



Figure 38. Two closely-spaced, anomalous, sandstone-infilled structures (arrowed) embedded within overbank mudrocks – possibly tetrapod burrows, Moordenaars Member, Nooitgedagt 148 (Loc.555) (Hammer = 30 cm).



Figure 39. Isolated block of dense bone in surface float, probably from the Swaerskraal Member, Farm 219 (Loc. 030). Specimen is *c*. 8 cm in longest dimension.



Figure 40. Extensive surface scatter of sizeable blocks of petrified wood weathering out from the Koornplaats Member, Hamel Kraal Farm 16 (Loc. 041). This site is of conservation significance (See also satellite image in Fig. 48).



Figure 41. Block of well-preserved silicified log showing woody fabric and knots, Hamel Kraal Farm 16 (Same locality as preceding figure) (Scale in cm and mm).



Figure 42. Partially embedded, secondarily-ferruginised petrified log that is breaking up *in situ*, Hamel Kraal Farm 16 (Same locality as Fig. 40) (Scale is 15 cm long).



Figure 43. Sizeable blocks of spongy fossil bone occurring as float in the vicinity of the petrified wood surface scatter seen in Fig. 40, Hamel Kraal 16 (Loc. 042) (Scale in cm and mm).



Figure 44. Rounded, reworked bone fragment embedded within ferruginised channel sandstone (*koffieklip*), Hamel Kraal Farm 16 (close to Loc. 041) (Bone is *c*. 1.5 cm wide).



Figure 45. Fragment of a large tusk (c. 2.5 cm across, circular in cross-section) – probably therapsid - that has weathered out of a basal channel breccia in the Koornplaats Member, Brewelskop, Hamel Kraal Farm 16 (Loc. 079).



Figure 46. Ferruginised mould of transported woody debris preserved within a channel breccia, Koornplaats Member, Brewelskop, Hamel Kraal Farm 16 (Loc. 079) (Scale in cm and mm).



Figure 47. Blocks of dark-patinated channel sandstone (*koffieklip*) showing prominentweathering intrastratal horizontal burrows, Hamel Kraal Farm 16 (Loc. 084) (Hammer = 30 cm). These rocks show a superficial resemblance to dolerite.

4. ASSESSMENT OF IMPACTS

Given the rather uniform geology and sparse, largely unpredictable distribution of recorded or anticipated palaeontological resources within the Rietrug WEF electrical grid infrastructure study area (Section 3), this impact assessment applies equally to all the proposed on-site and third party substation sites as well as the alternative 132 kV powerline routes under consideration for the Rietrug WEF electrical grid infrastructure project (Fig. 1).

All South African fossil heritage is protected by law (South African Heritage Resources Act, 1999) and fossils may not be collected, damaged or disturbed without a permit from the relevant Provincial Heritage Resources Agencies (in this case Heritage Western Cape and SAHRA) (See Section 1.2). The construction phase of the proposed on-site substation and 132 kV powerline will entail extensive surface clearance (notably for service roads, pylon footings, laydown areas, O&M buildings) as well as excavations into the superficial sediment cover and underlying bedrocks (*e.g. for* pylon footings, building foundations, service roads). The development may adversely affect potential fossil heritage within the study area by destroying, damaging, disturbing or permanently sealing-in fossils preserved at or beneath the surface of the ground that are then no longer available for scientific research or other public good.

The planning, operational and de-commissioning phases of the electrical grid infrastructure are very unlikely to involve further adverse impacts on local palaeontological heritage and are therefore not separately assessed here.

4.1. Impact assessment for the construction phase

This assessment (See Table 1) refers to impacts on fossil heritage preserved at or beneath the ground surface within the footprint of the proposed on-site substation (including O&M building, laydown area) and associated 132 kV powerline during the construction phase, mainly due to surface clearance and excavation activities. It is noted that surface clearance for lengthy service roads associated with new powerlines is likely to have greater impact on fossil heritage than the intermittent, shallow excavations for small pylon footings. Such impacts on fossil heritage are site specific (limited to the development footprint) and are generally direct, negative and of permanent duration (non-reversible). While fossils of some sort (including microfossils, invertebrate trace fossils and plant debris) are of widespread occurrence within the project area, unique or scientifically-important (conservation-worthy) fossils are very scarce and unpredictably distributed here, even where bedrock exposure levels are locally high. Only one highly-sensitive "no-go" area was identified within the Rietrug WEF electrical grid infrastructure study area and this lies outside the proposed development footprint (Figure 48). It is concluded that impacts on scientifically important palaeontological heritage resources are unlikely and of slight consequence since (1) significant fossil sites are unlikely to be affected, given the small development footprint and rarity of scientifically-important fossils and (2) in many cases these impacts can be mitigated. The overall impact significance during the construction phase of the substation and powerline infrastructure, including the powerline service road, without mitigation is rated as VERY LOW in terms of palaeontological heritage resources. Should the proposed mitigation measures outlined in Section 5 below be fully implemented, the impact
significance would remain very low. However, residual negative impacts such as the inevitable loss of fossil heritage would be partially offset by an improved understanding of Karoo fossil heritage which is considered a *positive* impact.

There are no objections on palaeontological heritage grounds to authorisation of the proposed electrical grid infrastructure developments. The very low significance rating applies equally to both powerline route options under consideration (Alternatives 1 and 2) and there are no preferences on palaeontological grounds for any particular powerline connection to a third-party substation or particular powerline route option (The shortest route will obviously have the lowest impact, though this may be offset by a longer onward connection to the Eskom national grid).

Confidence levels for this assessment are rated as only *medium*. This is due to the necessarily superficial coverage of the recent field assessment, the failure to access several key sectors of the power line route options, and the absence of field-based palaeontological assessments for the relevant WEF projects.

The impact assessment for the **No-Go Option** considers future impacts on local fossil heritage that are likely to occur in the absence of the WEF powerline and substation development, using the present status of fossil heritage in the area as a baseline. Destruction of near-surface or surface fossil material by natural bedrock weathering and erosion will be partially counterbalanced by on-going exposure of fresh fossil material by erosion. Improvements in our understanding of palaeontology of the area (a possible positive impact) will depend on whether or not field-based academic or impact studies are carried out here, which is inherently unpredictable (There is an on-going research project on the palaeontology of the SW Karoo by Wits University).

Table 1 (below): Assessment of anticipated direct impacts on palaeontological heritage resources for the proposed Rietrug WEF electrical grid infrastructure, including an on-site substation (with laydown area and O&M Building) and associated 132 kV powerline and connection to a third party substation, as well as a service road below the powerline (construction phase). This assessment applies equally to both powerline route options (Alternatives 1 and 2) and both third-party substations under consideration.

Aspect/ Impact pathway	Nature of potential impact/risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of impact	Irreplaceability of receiving environment/resource	Potential mitigation measures	Without impa poud /management	With mitigation /management (residual risk/impact)	Ranking of impact/risk	Confidence level
Surface clearance for access roads, substation s and laydown areas etc. Excavation s for power line footings, O&M building	Disturbance, damage or destruction of scientifically important fossils at or beneath the ground surface.	Negative	Site specific	Permanent	Slight	Unlikely	Non-reversible	Moderate	 Safeguarding of identified sites of high palaeontological sensitivity by a 30-m wide buffer zone (i.e. extensive surface scatter of petrified wood <i>plus</i> occasional bone fragments either side of a farm track). A <i>pre-construction</i> walk-down must be undertaken by a palaeontological specialist for any sectors of the 132 kV powerline route finally chosen that were not covered during the Basic Assessment Phase (Refer to the yellow dashed rectangle in Fig. 1). The resulting report will need to be submitted to and approved by the relevant heritage management authority. Monitoring of all surface clearance and substantial (deeper than 1 m) excavations by the ECO for fossil material Safeguarding of chance fossil finds by ECO Reporting of chance fossil finds to Heritage Western Cape (HWC) / SAHRA Recording and sampling of significant chance fossil finds by a qualified palaeontologist (Phase 2 mitigation) Curation of fossil material within an approved repository (museum / university fossil collection) 	Very low	Very low	5	Medium

4.2. Assessment of cumulative impacts (construction phase)

In the current absence of field-based palaeontological heritage assessments for the relevant Sutherland, Sutherland 2 and Rietrug WEFs (These studies have been requested in the preconstruction phase by SAHRA, Interim Comment of 5 July 2016; Case ID 9622) as well as the separate Moyeng Energy Suurplaat WEF, it is not yet feasible to meaningfully assess cumulative palaeontological impacts for the associated electrical grid infrastructure. Among available palaeontological impact studies for other developments proposed for the region, the most relevant are those on the Roggeveld Plateau for Jakhals Valley solar project (Almond 2011) and the Gunsfontein WEF (Almond 2015g), both located to the south of Sutherland and west of the present study area. The Gamma-Omega 765 kV powerline study by Almond (2012a) considers fossil heritage in the Koup region to the west of Merweville. There are numerous further WEF projects proposed for the Klein-Roggeveld region, below the great escarpment and south of the present study area, but for the most part these concern rocks and fossil assemblages that are older than those encountered in the present study area; exceptions include the Maralla East and Maralla WEFs (Almond 2015j, 2015k).

In all the strictly relevant field-based palaeontological studies in the Klein-Roggeveld and Roggeveld Plateau regions the palaeontological sensitivity of the project area and the palaeontological heritage impact significance for the developments concerned has been rated as low. In all cases it was concluded by the author that, despite the undoubted occurrence of scientifically-important fossil remains (notably fossil vertebrates, vertebrate trackways and burrows, petrified wood), the overall impact significance of the proposed developments was low because the probability of significant impacts on scientifically *important, unique or rare fossils* was slight. While fossils do indeed occur within some of the formations present, they tend to be sparse - especially as far as fossil vertebrates are concerned - while the great majority represent common forms that occur widely within the outcrop areas of the rock units concerned. It is concluded that – pending the outcome of outstanding palaeontological field-based studies for the Moyeng Energy Suurplaat WEF and original Mainstream Sutherland WEF (now split into the Sutherland, Sutherland 2 and Rietrug WEFs) - the cumulative impact significance of the proposed new electrical grid infrastructure developments in the context of other regional projects is likely to be low (negative). This is the case provided that the proposed monitoring and mitigation recommendations made for all these various projects are followed through. Unavoidable residual negative impacts may be partially offset by the improved understanding of Karoo palaeontology resulting from appropriate professional mitigation. This is regarded as a positive impact for Karoo palaeontological heritage. However, without mitigation the magnitude of cumulative (negative, direct) impacts of such a large number of WEFs and associated powerlines affecting the same (albeit sparsely) fossiliferous rock successions would be significantly higher and probable. The cumulative impact significance without mitigation is accordingly assessed provisionally as medium.

5. MITIGATION AND MANAGEMENT MEASURES

A *pre-construction* walk-down by a palaeontological specialist is required for any sectors of the 132 kV powerline route finally chosen that were not covered during the Basic Assessment Phase (See yellow dashed rectangle in Fig. 1). The resulting report, together with any recommendations for mitigation or monitoring, will need to be approved by the relevant heritage management authority (SAHRA or HWC).

Given the scarcity of scientifically-important, unique fossil heritage recorded within the remainder of the Rietrug 2 WEF electrical grid connection study area, no further specialist palaeontological studies or mitigation are recommended here, pending the potential discovery of significant new fossils before or during the construction phase.

The following specific and general palaeontological mitigation measures apply to the *construction phase* of the electrical infrastructure development (See Table 2):

- Safeguarding of identified sites of high palaeontological sensitivity by a 30-m wide buffer zone (See sites specified in Figs. 1 and 48).
- Monitoring of all surface clearance and substantial excavations (>1 m deep) by the ECO for fossil material (*e.g.* bones, teeth, fossil wood) on an on-going basis during the construction phase.
- Safeguarding of chance fossil finds (preferably *in situ*) during the construction phase by the responsible ECO, followed by reporting of finds to Heritage Western Cape / SAHRA.
- Recording and judicious sampling of significant chance fossil finds by a qualified palaeontologist, together with pertinent contextual data (stratigraphy, sedimentology, taphonomy) (Phase 2 mitigation).
- Curation of fossil material within an approved repository (museum / university fossil collection) and submission of a Phase 2 palaeontological heritage report to HWC / SAHRA by a qualified palaeontologist.

Mitigation of significant chance fossil finds reported by the ECO would involve the recording, sampling and / or collection of fossil material and associated geological data by a professional palaeontologist during the construction phase of the development. The palaeontologist concerned with potential mitigation work (Phase 2) would need a valid fossil collection permit from the relevant heritage management authority, *i.e.* Heritage Western Cape (W. Cape) or SAHRA (N. Cape), and any material collected would have to be curated in an approved depository (*e.g.* museum or university collection). All palaeontological fieldwork and reporting should meet the minimum standards outlined by HWC (2016) and SAHRA (2013).

Significant further impacts on palaeontological heritage resources are not anticipated during the operational, decommissioning and rehabilitation phases of the proposed Rietrug WEF Electrical Grid Infrastructure, so no further mitigation or management measures in this respect are proposed here.

These monitoring and mitigation requirements should be incorporated into the EMPr for the proposed electrical grid infrastructure project and also included as conditions for authorisation of the development.



Figure 48. Google earth satellite image of part of Farm Hamel Kraal 16 showing the location of an extensive surface scatter of petrified wood *plus* occasional bone fragments either side of a farm track (Locs. 041- 074). The yellow polygon outlines a *c*. 30-m wide peripheral buffer zone around the fossil scatter. The black line *c*. 500 m to the northeast shows powerline Alternative 2.

Table 2 (below): Contributions to the EMPR for the proposed Rietrug WEF electrical grid infrastructure, including an on-site substation and associated 132 kV powerline and connection to a third party substation, as well as a service road below the powerline (pre-construction and construction phase activities).

Management Plan for the Construction Phase (Including pre- and post-construction activities)

Impact	Mitigation/Management	Mitigation (Management Actions	Monitoring			
impact	Objectives and Outcomes	witigation/wanagement Actions	Methodology	Frequency	Responsibility	
Aspect: Palaeontological Her	itage		·	•		
Disturbance, damage or	Protection of known sensitive fossil	1. Pre-construction palaeontological	Palaeontologist to	Once-off prior to	Qualified	
destruction of fossils	sites from disturbance.	walk down of un-surveyed sectors of	undertake field study	construction.	Palaeontologist	
preserved at or below the		the finally selected powerline route.	of areas not surveyed		(appointed by the	
ground surface during	Safeguarding, recording and		in original		Project Developer)	
construction activities	sampling of significant new chance	2. Safeguarding of identified sites of	assessment.	On-going during		
(especially ground	fossil finds.	high palaeontological sensitivity by a		construction	ECO	
clearance and substantial		30-m wide buffer zone during	Monitoring of all			
excavations)	Improved palaeontological database	construction (See sites specified in	surface clearance			
	for the SW Karoo region.	Figs. 1 and 48).	and substantial		ECO and qualified	
			excavations (>1 m		Palaeontologist	
		3. Safeguarding of chance fossil finds	deep) for fossil		(appointed by the	
		(preferably in situ) during the	material (e.g. bones,	During fossil finds	Project Developer)	
		construction phase by the responsible	teeth, fossil wood).			
		ECO, followed by reporting of finds to				
		Heritage Western Cape / SAHRA.	Reporting of			
			significant chance			
		4. Recording and judicious sampling of	fossil finds to the			
		significant chance fossil finds by a	relevant heritage			
		qualified palaeontologist, together	management			
		with pertinent contextual data	authority (HWC /			
		(stratigraphy, sedimentology,	SAHRA) and permit			
		taphonomy) (Phase 2 mitigation).	application.			
		5. Curation of fossil material within an				
		approved repository (museum /				
		university fossil collection) and				
		submission of a Phase 2				
		palaeontological heritage report to				
		HWC / SAHRA by a qualified				
		palaeontologist.				

6. ACKNOWLEDGEMENTS

Ms Rohaida Abed of the CSIR – Environmental Management Services, Durban, is thanked for providing a constant, and sometimes overwhelming, stream of background information for this project as well as for managing the various stages of the fieldwork and report preparation. I am grateful to Dr Jayson Orton of ASHA Consulting (Pty) Ltd, Cape Town, for advice on heritage management issues during the course of project and for incorporating the palaeontological data into a meaningful Heritage Impact Assessment. Logistical back-up as well as assistance in the field *plus* companionship from Ms Madelon Tusenius is, as ever, very much appreciated.

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QUALIFICATIONS & EXPERIENCE OF THE AUTHOR

Dr John Almond has an Honours Degree in Natural Sciences (Zoology) as well as a PhD in Palaeontology from the University of Cambridge, UK. He has been awarded post-doctoral research fellowships at Cambridge University and in Germany, and has carried out palaeontological research in Europe, North America, the Middle East as well as North and South Africa. For eight years he was a scientific officer (palaeontologist) for the Geological Survey / Council for Geoscience in the RSA. His current palaeontological research focuses on fossil record of the Precambrian - Cambrian boundary and the Cape Supergroup of South Africa. He has recently written palaeontological reviews for several 1: 250 000 geological maps published by the Council for Geoscience and has contributed educational material on fossils and evolution for new school textbooks in the RSA.

Since 2002 Dr Almond has also carried out palaeontological impact assessments for developments and conservation areas in the Western, Eastern and Northern Cape, Limpopo, Northwest, Gauteng and the Free State under the aegis of his Cape Town-based company *Natura Viva* cc. He has served as a long-standing member of the Archaeology, Palaeontology and Meteorites Committee for Heritage Western Cape (HWC) and an advisor on palaeontological conservation and management issues for the Palaeontological Society of South Africa (PSSA), HWC and SAHRA. He is currently compiling technical reports on the provincial palaeontological heritage of Western, Northern and Eastern Cape for SAHRA and HWC. Dr Almond is an accredited member of PSSA and APHP (Association of Professional Heritage Practitioners – Western Cape).

Specialist Declaration

I, Dr John Edward Almond, as the appointed independent specialist, in terms of the 2014 EIA Regulations, hereby declare that I:

- I act as the independent specialist in this application;
- I perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct, and do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I have no vested interest in the proposed activity proceeding;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I have ensured that information containing all relevant facts in respect of the specialist input/study was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments on the specialist input/study;
- I have ensured that the comments of all interested and affected parties on the specialist input/study were considered, recorded and submitted to the competent authority in respect of the application;
- all the particulars furnished by me in this specialist input/study are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Name of Specialist: Dr John Edward Almond

Then E. Almond

Signature of the specialist:

Date: 20 February 2017

APPENDIX: SUTHERLAND WEF ELECTRICAL GRID INFRASTRUCTURE FOSSIL SITES & SELECTED GEO-SITES

All GPS readings were taken in the field using a hand-held Garmin GPSmap 60CSx instrument. The datum used is WGS 84. Land parcel names used in the table refer to those shown on the relevant 1: 50 000 topographical maps published by the Chief Directorate: National Geo-spatial Information, Mowbray. Fossil localities that were recorded during fieldwork are shown in relation to relevant major components of the proposed development footprint on the satellite image provided in Figure 1. Please note that this map does *not* show all fossils that are present at surface within the study area, and additional, unrecorded fossil occurrences (the majority) are to be expected at the surface or in the subsurface, where they may be impacted during the construction phase of the development. Areas on the map that do not contain known fossil sites are therefore not necessarily fossil-free or palaeontologically insensitive.

N.B. Fossil locality data is not for general release to the public (e.g. through publication on open access websites) for conservation reasons.

BASIC ASSESSMENT REPORT

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure)

APPENDIX D.5: Avifauna Assessment

Basic Assessment for the proposed Construction of Electrical Grid Infrastructure to support the proposed Rietrug Wind Energy Facility, near Sutherland, in the Northern and Western Cape Provinces

Report prepared for: CSIR - Environmental Management Services P O Box 17001 Congella, Durban, 4013 South Africa

Report prepared by:

AFRIMAGE Photography (Pty) Ltd Va Chris van Rooyen Consulting VAT#: 4580238113 email: vanrooyen.chris@gmail.com Tel: +27 (0)82 4549570 cell



SPECIALIST CV

Chris van Rooyen

NAME:	Chris van Rooyen
PROFESSION:	Avifaunal Specialist
HIGHEST QUALIFICATION:	LLB
ΝΑΤΙΟΝΑΙ ΙΤΥ·	South African
	South Antean
	20 voors
TEARS OF EXPERIENCE.	20 years

KEY QUALIFICATIONS

Chris van Rooyen has twenty years' experience in the assessment of avifaunal interactions with industrial infrastructure. He was employed by the Endangered Wildlife Trust as head of the Eskom-EWT Strategic Partnership from 1996 to 2007, which has received international acclaim as a model of co-operative management between industry and natural resource conservation. He is an acknowledged global expert in this field and has consulted in South Africa, Namibia, Botswana, Lesotho, New Zealand, Texas, New Mexico and Florida. He also has extensive project management experience and he has received several management awards from Eskom for his work in the Eskom-EWT Strategic Partnership. He is the author and/or co-author of 17 conference papers, co-author of two book chapters, several research reports and the current best practice guidelines for avifaunal monitoring at wind farm sites. He has completed around 130 power line assessments; and has to date been employed as specialist avifaunal consultant on more than 50 renewable energy generation projects. He has also conducted numerous risk assessments on existing power lines infrastructure. He also works outside the electricity industry and he has done a wide range of bird impact assessment studies associated with various residential and industrial developments. He serves on the Birds and Wind Energy Specialist Group which was formed in 2011 to serve as a liaison body between the ornithological community and the wind industry.

PROFESSIONAL AFFILIATIONS

I work under the supervision of and in association with Albert Froneman (MSc Conservation Biology) (SACNASP Zoological Science Registration number 400177/09) as stipulated by the Natural Scientific Professions Act 27 of 2003.

Curriculum vitae: Albert Froneman

Profession/Specialisation	:	Avifaunal Specialist
Highest Qualification	:	MSc (Conservation Biology)
Nationality	:	South African
Years of experience	:	18 years

KEY QUALIFICATIONS

Albert Froneman (Pr.Sci.Nat) has more than 18 years' experience in the management of

avifaunal interactions with industrial infrastructure. He holds a M.Sc. degree in Conservation Biology from the University of Cape Town. He managed the Airports Company South Africa (ACSA) - Endangered Wildlife Trust Strategic Partnership from 1999 to 2008 which has been internationally recognized for its achievements in addressing airport wildlife hazards in an environmentally sensitive manner at ACSA's airports across South Africa. Albert is recognized worldwide as an expert in the field of bird hazard management on airports and has worked in South Africa, Swaziland, Botswana, Namibia, Kenva, Israel, and the USA. He has served as the vice chairman of the International Bird Strike Committee and has presented various papers at international conferences and workshops. At present, he is consulting to ACSA with wildlife hazard management on all their airports. He also an accomplished specialist ornithological consultant outside the aviation industry and has completed a wide range of bird impact assessment studies. He has co-authored many avifaunal specialist studies and pre-construction monitoring reports for proposed renewable energy developments across South Africa. He also has vast experience in using Geographic Information Systems to analyse and interpret avifaunal data spatially and derive meaningful conclusions. Since 2009 Albert has been a registered Professional Natural Scientist (Registration Number 400177/09) with The South African Council for Natural Scientific Professions, specialising in Zoological Science.

SPECIALIST DECLARATION

I, Chris van Rooyen, as the appointed independent specialist, in terms of the 2014 EIA Regulations, hereby declare that I:

- I act as the independent specialist in this application;
- I perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct, and do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have not, and will not engage in, conflicting interests in the undertaking of the activity;
- I have no vested interest in the proposed activity proceeding;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I have ensured that the comments of all interested and affected parties on the specialist input/study were considered, recorded and submitted to the competent authority in respect of the application;
- all the particulars furnished by me in this specialist input/study are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Name of Specialist: Chris van Rooyen

Signature of the specialist

Date: 26 March 2017

EXECUTIVE SUMMARY

The objectives of the report are to investigate the potential impact of the proposed Rietrug Wind Energy Facility (WEF) 132kV grid connection (and associated infrastructure) on avifauna in order to assess whether the project is fatally flawed from an avifaunal impact perspective and, if not, what mitigation measures should be implemented to reduce the potential impacts.

The proposed Rietrug grid connection will have the following potential impacts on avifauna:

- Displacement of Red Data avifauna due to disturbance associated with the construction (and decommissioning) of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).
- Displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).
- Electrocution on the proposed 132kV powerline and in the on-site substation; and
- Mortality due to collision with the earthwire of the proposed 132kV powerline.

Displacement due to habitat transformation due to construction activities (Construction Phase)

Habitat transformation has an impact on birds breeding, foraging and roosting in or in close proximity of the proposed on-site substation (inclusive of the O&M Building and lavdown area) and service road construction footprints, which could result in temporary or permanent displacement. Unfortunately, very little mitigation can be applied to reduce this impact as the total permanent transformation of the natural habitat within the construction footprint of the proposed service road, substation yard and O&M building is unavoidable. However, due to the nature of the vegetation, and judged by the existing Roggeveld / Sutherland 1 66kV sub-transmission line, very little if any vegetation clearing will be required in the 132kV powerline servitude. The habitat in the study area is very uniform from a bird impact perspective, therefore the loss of habitat for Red Data species due to direct habitat transformation associated with the construction of the proposed on-site substation, O&M building and service road is likely to be fairly minimal. The impact significance is assessed to be Low, both before and after mitigation. The species most likely to be directly affected by this impact would be small, non-Red Data species. The 25ha development envelope (for the proposed on-site substation, O&M Building and laydown area) contains uniform habitat for avifauna, therefore the proposed on-site substation and O&M building could be located anywhere within the development envelope, with no material difference in the impact on avifauna. Although both options are acceptable from an avifaunal impact perspective, as far as the proposed service road is concerned, Alternative 1 is the preferred option, as it is approximately 61% shorter than Alternative 2, with significantly less of an impact from a habitat transformation perspective. Suggested mitigation measures are restricting the footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control dust, restricted access to the rest of the property, and rehabilitation of all areas disturbed.

Displacement due to disturbance associated with construction and decommissioning activities (Construction and Decommissioning Phase)

Apart from direct habitat destruction, construction activities also impact on birds through disturbance; this could lead to breeding failure if the disturbance happens during a critical part of the breeding cycle. Construction activities in close proximity to breeding locations could be a source of disturbance and could lead to temporary breeding failure or even permanent abandonment of nests. A potential mitigation measure is the timeous identification of nests and the timing of the construction activities to avoid disturbance during a critical phase of the breeding cycle. Large terrestrial species, including Red Data Ludwig's Bustard, Karoo Korhaan and Southern

Black Korhaan, are most likely to be affected by displacement due to disturbance. The groundnesting Black Harrier could also potentially be vulnerable to this impact, but the habitat in the study area is not ideal for this species from a breeding perspective. Although both options are acceptable from an avifaunal impact perspective as far as the proposed service road and the powerline are concerned, Alternative 1 is the preferred option, as it is 61% shorter than Alternative 2, with significantly less of an impact from a disturbance perspective. The impact significance is assessed to be Moderate before mitigation, and Low after mitigation. Suggested mitigation measures are restricting the footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control noise, restricted access to the rest of the property, training the Environmental Control Officer (ECO) to identify Red Data nests during construction, and a preconstruction walk-through by the avifaunal specialist to identify any Red Data nests coupled with the timing of the construction if need be.

Electrocution (Operational Phase)

In the case of the proposed grid connections, no electrocution risk is envisaged because the proposed design of the 132kV line, namely the steel monopole, will not pose an electrocution threat to any of the priority species which are likely to occur at the site. Electrocutions within the proposed on-site substation yard are possible, but should not affect the more sensitive Red Data bird species, as these species are unlikely to use the infrastructure within the substation yards for perching or roosting. There is no material difference in the risk associated with the two alternative route options, as they will both be utilising the same steel monopole design. Suggested mitigation measures are certification of the proposed powerline design as bird-friendly by the avifaunal specialist before construction commences, and reactive mitigation in the proposed on-site substation site if electrocutions are recorded. The risk is assessed to be of Very Low significance, both before and after mitigation.

Collisions (Operational Phase)

The most likely Red Data candidates for collision mortality on the proposed powerline are Ludwig's Bustards, Karoo Korhaan and Southern Black Korhaan in natural habitat, and Greater Flamingo near dams. Non-Red Data waterbirds could also be at risk near dams and where the line crosses drainage lines (see Table 1 in the specialist report for a list of species that could be at risk). Martial and Verreaux's Eagle might also be at risk, especially at surface water when they descend to bath and drink. Alternative 1 is approximately 17km long and Alternative 2 approximately 44km, with both alternatives running through the same habitat. However, Alternative 2 is 61% longer than Alternative 1, and would therefore create a larger collision risk due to its considerable longer length. Alternative 1 is thus the preferred alternative from an avifaunal impact perspective, although both alternatives are acceptable provided the proposed anti-collision mitigation is implemented. Suggested mitigation measures are a walk-through by the avifaunal specialist to record collision-related mortality. The risk is assessed to be of High significance, but it can be reduced to Moderate through the application of mitigation measures.

Cumulative impacts (All phases)

Large raptor species, particularly Verreaux's Eagle and Martial Eagle, are potentially most at risk as far as cumulative impacts of the cluster of renewable energy projects in the 70km radius around the Komsberg Substation is concerned. However, the Rietrug grid connection should not materially threaten these species. The concern from a powerline interaction perspective is more for large terrestrial species, particularly Ludwig's Bustard, which is highly susceptible to powerline collisions. The Rietrug grid connection will add an additional 17km or 44km of HV (High Voltage) line to the existing HV network in the area, depending on which alternative is built. Several

hundred kilometres of HV line already exists within this area, and several more are planned should the renewable energy projects all be built. The overall cumulative impact of the Rietrug grid connection, when viewed with the existing impacts on avifauna, is assessed to be of Moderate significance, and is likely to remain at that level after mitigation.

The table below provides a summary of the respective significance ratings, and an average overall rating before and after mitigation.

IMPACT	RATING PRE-MITIGATION	RATING POST-MITIGATION
Construction Phase:	Low (4)	Low (4)
Displacement due to habitat		
transformation		
Construction Phase:	Moderate (3)	Low (4)
Displacement due to		
disturbance		
Operational Phase:	Very Low (5)	Very Low (5)
Electrocution		
Operational Phase: Collisions	High (2)	Moderate (3)
All Phases: Cumulative	Moderate (3)	Moderate (3)
impacts		
Average:	Moderate to Low (3.4)	Low to Moderate (3.8)

Final Specialist Statement and Authorisation Recommendation

The overall potential impact on Red Data avifauna is assessed to be **Moderate to Low before mitigation measures**, **leaning more towards Moderate**. After the application of mitigation measures, the overall potential impact is assessed to be **marginally above Low**. It is therefore recommended that the activity is authorised, on condition that the proposed mitigation measures as detailed in the Environmental Management Programme (EMPr) (APPENDIX 3) are strictly implemented.

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LIST OF ABBREVIATIONS

EIA	Environmental Impact Assessment
BA	Basic Assessment
DEA	Department of Environmental Affairs
WEF	Wind Energy Facility
I&APs	Interested and affected parties
IBA	Important Bird Area
BLSA	BirdLife South Africa
EWT	Endangered Wildlife Trust
SABAP 2	Southern African Bird Atlas Project 2
BFD	Bird Flight Diverters

GLOSSARY

	DEFINITIONS
Study area	The area comprising a 2 km radius around the proposed powerline alternative alignments
Priority species	Red Data avifauna which could potentially occur in the study area
Pentad Grid	A pentad grid cell covers 5 minutes of latitude by 5 minutes of longitude

COMPLIANCE WITH THE APPENDIX 6 OF THE 2014 EIA REGULATIONS (AS AMENDED)

Doguiroments of Appendix 6 CN D226 (7 April 2017)	Addressed in the
Requirements of Appendix 6 - GN R326 (7 April 2017)	Specialist Report
1. (1) A specialist report prepared in terms of these Regulations must contain-	Preliminary Section
a) details of-	of this report
i. the specialist who prepared the report; and	
II. the expertise of that specialist to compile a specialist repor	
b) a declaration that the specialist is independent in a form as may be specified	Proliminary Section
by a declaration that the specialist is independent in a form as may be specified	of this report
c) an indication of the scope of, and the purpose for which, the report wa	S Section 1
prepared;	
(cA) an indication of the quality and age of base data used for the specialis	Section 1.3 and
report;	Section 2.1 (note
	that this desktop BA
	Project was
	construction
	avifauna monitoring
	required for the
	Sutherland,
	Sutherland 2 and
	Rietrug WEFs).
(cB) a description of existing impacts on the site, cumulative impacts of the	Sections 4, 5 and 6
proposed development and levels of acceptable change;	and Appendix 2
 d) the duration, date and season of the site investigation and the relevance of the cases to the sufference of the assessment; 	Section 1 and
a description of the methodology adopted in preparing the report or carrying	Section 2
out the specialised process inclusive of equipment and modelling used.	J Jection 2
f) details of an assessment of the specific identified sensitivity of the site	e Section 4
related to the proposed activity or activities and its associated structures and	1
infrastructure, inclusive of a site plan identifying alternatives;	
g) an identification of any areas to be avoided, including buffers;	Section 4
h) a map superimposing the activity including the associated structures and	I Section 4
infrastructure on the environmental sensitivities of the site including areas to	
De avoided, including buffers;	Section 2
i) a description of any assumptions made and any uncertainties of gaps in knowledge.	
i) a description of the findings and potential implications of such findings on the	Section 5
impact of the proposed activity or activities;	
k) any mitigation measures for inclusion in the EMPr;	Section 6
I) any conditions for inclusion in the environmental authorisation;	Section 11
m) any monitoring requirements for inclusion in the EMPr or environmenta	Section 9
authorisation;	Continue 10 1 11
I) a reasoned opinion-	Sections 10 and 11
be authorised:	
(iA) regarding the acceptability of the proposed activity and	1
activities; and	
ii. if the opinion is that the proposed activity, activities or portion	s
thereof should be authorised, any avoidance, management and	1
mitigation measures that should be included in the EMPr, and where	¢
applicable, the closure plan;	
o) a description of any consultation process that was undertaken during the	e Section 2
course of preparing the specialist report;	

Requirements of Appendix 6 - GN R326 (7 April 2017)	Addressed in the Specialist Report
p) a summary and copies of any comments received during any consultation	No comments
process and where applicable all responses thereto; and	received so far
 any other information requested by the competent authority. 	Not applicable
2. Where a government notice gazetted by the Minister provides for any protocol of	Not Applicable
minimum information requirement to be applied to a specialist report, the	
requirements as indicated in such notice will apply	

BIRD IMPACT ASSESSMENT STUDY

This report presents the Bird Impact Assessment Study that was prepared by Chris van Rooyen of Chris van Rooyen Consulting as part of the Basic Assessment (BA) Process for the proposed construction of electrical infrastructure to support the proposed Rietrug Wind Energy Facility (WEF), near Sutherland, in the Northern and Western Cape Provinces.

1 INTRODUCTION

1.1 Scope, Purpose and Objectives of this Specialist Report

The objectives of the report are to investigate the potential impact of the proposed Rietrug WEF 132kV grid connection (and associated infrastructure) on avifauna in order to assess whether the project is fatally flawed from an avifaunal impact perspective and, if not, what mitigation measures should be implemented to reduce the potential impacts.

1.2 Terms of Reference

The terms of reference for this impact assessment report are as follows:

- Describe the affected environment from an avifaunal perspective;
- Discuss gaps in baseline data and other limitations;
- List and describe the expected impacts for the proposed Rietrug WEF 132kV on-site substation (including laydown area and Operations and Maintenance (O&M) Building), grid connection and service road on avifauna;
- Assess and evaluate the potential impacts;
- Recommend mitigation measures to reduce the impact of the expected impacts on avifauna; and
- Provide a reasoned opinion as to whether the proposed development should proceed or not.

1.3 Assessment Details

Type of Specialist Investigation	Bird Impact Assessment Study
Date of Specialist Site Investigation	12-months pre-construction monitoring programme conducted over four seasons in 2015/2016 for the proposed Sutherland, Sutherland 2 and Rietrug WEFs.
Season	All four seasons
Relevance of Season	All four seasons are important from an avifaunal perspective

2 APPROACH AND METHODOLOGY

2.1 Information Sources

The following information sources were used in compiling the report:

- Bird distribution data of the Southern African Bird Atlas Project 2 (SABAP 2) was obtained (http://sabap2.adu.org.za/), in order to ascertain which species occur in the pentads where the proposed Sutherland, Sutherland 2 and Rietrug WEFs are located. It is important to note that these three WEFs were assessed as part of a separate Environmental Impact Assessment (EIA) Process, which received Environmental Authorisation (EA) on 22 February 2012, an amended EA on 6 October 2015 and separate amended EAs in November 2016. The requirement for pre-construction monitoring was stipulated as a condition in the EAs. A pentad grid cell covers 5 minutes of latitude by 5 minutes of longitude (5'× 5'). Each pentad is approximately 8 × 7.6 km. In order to get a more representative impression of the birdlife, a consolidated data set was obtained for the 24 pentads which overlap substantially with the proposed Rietrug grid connection options. A total of 103 full protocol lists have been completed to date for the 24 pentads where the study area is located (i.e. lists surveys lasting a minimum of two hours each). The SABAP2 data was therefore regarded as a reliable snapshot of the avifauna, especially when supplemented by actual data collected during surveys and through general knowledge of the area.
- A classification of the vegetation types in the study area was obtained from the Atlas of Southern African Birds 1 (SABAP1) and the National Vegetation Map compiled by the South African National Biodiversity Institute (Mucina & Rutherford 2006).
- The national threatened status of all priority species was determined with the use of the most recent edition of the Red Data Book of Birds of South Africa, Lesotho and Swaziland (Taylor *et al.* 2015), and the latest authoritative summary of southern African bird biology (Hockey *et al.* 2005).
- The global threatened status of all priority species was determined by consulting the (2016.3) IUCN Red List of Threatened Species (http://www.iucnredlist.org/).
- The BirdLife South Africa (BLSA) was consulted on Important Bird Areas of Southern Africa for information on relevant Important Bird Areas (IBAs) (Marnewick *et al.* 2015).
- Satellite imagery from Google Earth was used in order to view the broader area on a landscape level and to help identify bird habitat on the ground.
- Information on bird diversity and abundance at the proposed Sutherland, Sutherland 2 and Rietrug WEF development site was obtained through a 12-months monitoring programme. Data was collected through transect counts, incidental sightings, inspection of potential focal points and the recording of flight behaviour from vantage points. In addition, extensive nest searches were conducted. This data was used as a supplementary source of information on the variety and abundance of avifauna in the study area.
- Information on existing raptor nests were obtained from avifaunal specialists Dr. Andrew Jenkins (Avisense Consulting) and Andrew Pearson (Arcus), as well as from the staff of the Komsberg Nature Reserve. Various landowners were also interviewed to obtain information on nests and roosting sites in the greater area.

2.2 Assumptions, Knowledge Gaps and Limitations

The following assumptions and limitations apply:

- Conclusions in this study are based on experience of these and similar species in different parts of South Africa. Bird behaviour can never be entirely reduced to formulas that will be valid under all circumstances. However, power line and substation impacts can be predicted with a fair amount of certainty, based on a robust body of research stretching back over thirty years (see References Section 12).
- The precautionary principle was applied throughout. The World Charter for Nature, which
 was adopted by the United Nations (UN) General Assembly in 1982, was the first
 international endorsement of the precautionary principle (http://www.unep.org). The
 principle was implemented in an international treaty as early as the 1987 Montreal Protocol

and, among other international treaties and declarations, is reflected in the 1992 Rio Declaration on Environment and Development. Principle 15 of the 1992 Rio Declaration states that: "in order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall be not used as a reason for postponing cost-effective measures to prevent environmental degradation."

- All Red Data avifauna were classified as priority species for purposes of the investigation.
- The core study area was defined as a 2km buffer zone around the proposed powerline alternative alignments.
- Cumulative impacts were assessed by adding expected impacts from this proposed development to existing and proposed developments with similar impacts in a 50-70km radius around the proposed development. The existing and proposed developments that were taken into consideration for cumulative impacts include:
 - Gunstfontein Wind Energy Project
 - o Sutherland WEF
 - o Sutherland 2 WEF
 - o Rietrug WEF
 - Maralla East Wind Energy Project
 - o Maralla West Wind Energy Project
 - Esizayo Wind Energy Project
 - Hidden Valley Wind Energy Project
 - o Roggeveld Wind Farm
 - Proposed Photovoltaic (PV) Solar Energy Facility on a site south of Sutherland
 - Suurplaat WEF
 - o Witberg WEF
 - o Konstabel WEF
 - o Perdekraal East and West WEFs
 - Komsberg East and West WEF
 - Sutherland 2 and Sutherland Electricity Grid Infrastructure Projects

2.3 Consultation Processes Undertaken

As noted above, information on existing raptor nests were obtained from avifaunal specialists Dr. Andrew Jenkins (Avisense Consulting) and Andrew Pearson (Arcus), as well as from the staff of the Komsberg Nature Reserve. Various landowners were also interviewed to obtain information on nests and roosting sites in the greater area.

3 DESCRIPTION OF PROJECT ASPECTS RELEVANT TO AVIFAUNAL IMPACTS

The following project aspects are relevant from a bird impact assessment perspective:

- On-site substation (including O&M building and laydown areas) within a development envelope of 25ha;
- A steel mono-pole 132kV distribution line from the on-site substation to the third-party substation (Alternative 1 approximately 17km and Alternative 2 approximately 44km), and
- A service road below the powerline with a width of between 4 m to 6 m, and a length similar to the 132kV distribution line. The service road deviates from the proposed powerline route in one minor section for Alternative 2 in order to avoid a significant terrestrial ecological feature.



See Figures 1 and 2 below for a map indicating the location of the proposed infrastructure.

Figure 1: Lay-out of the proposed infrastructure: Alternative 1



Figure 2: Lay-out of the proposed infrastructure: Alternative 2

4 DESCRIPTION OF THE RECEIVING ENVIRONMENT

4.1 Baseline Environmental Description

The proposed development is located at the junction of the Fynbos, Succulent Karoo and Nama Karoo biomes (Mucina & Rutherford 2006). The study area is primarily situated on a plateau at an altitude of between 1600 and 1700 meters above sea-level and partially straddles the escarpment of the Klein-Roggeveld and Komsberg mountain ranges. The dominant vegetation type is Roggeveld Shale Renosterveld with a small section of Central Mountain Shale Renosterveld, while the extreme eastern section of the study area is located in Gamka Karoo (Mucina & Rutherford 2006). Roggeveld Shale Renosterveld vegetation type occurs on undulating, plateau landscapes with low hills and broad shallow valleys, supporting mainly moderately tall shrublands dominated by renosterbos, with rich geophytic flora in the wetter and rocky habitats. Central Mountain Shale Renosterveld is found on slopes and broad ridges of low mountains and escarpments. It consists of tall shrubland dominated by renosterbos and large suites of mainly non-succulent karoo shrubs with a rich geophytic flora in the undergrowth or in more open, wetter or rocky habitats. Gamka Karoo occurs on undulating plains and consists of dwarf spiny shrubland dominated by Karoo dwarf shrubs with rare low trees. Dense stands of drought-resistant grasses cover (especially after abundant rains) broad sandy bottomlands. The climate is guite severe, with about 170 mm of rain per annum, falling mostly in winter, with mean winter minimum and summer maximum temperatures of 0° C and 29°C respectively (Mucina & Rutherford 2006). The study area is bisected by several ephemeral drainage lines. There are also several artificial impoundments in the study area on the plateau as well as a number of natural, flat depressions which hold water after good rains. The main land-use is sheep farming. The Roggeveld / Sutherland 1 66kV sub-transmission line runs to the west of the study area in a north-south direction.

Refer to Figures 3 to 5 for representative examples of the habitat in the study area.



Figure 3: Typical renosterveld vegetation in the study area on the plateau above the Komsberg mountains.


Figure 4: Another example of the renosterveld vegetation in the study area



Figure 5: An ephemeral drainage line in the study area

A total of 146 bird species could potentially occur in the study area. Of these, 12 are classified as priority (Red Data) species. Table 1 below lists the priority species that could potentially occur in the study area, as well as the potential impact on the species in the study area.

Sp	ecies	Status					labita	at	Impacts			
Common name	Taxonomic	Global status	Local status	SABAP2 reporting rate	Recorded during pre- construction monitoring	Renosterveld/Karoo	Drainage lines	Dams and pans	Collisions	Displacement: habitat destruction	Displacement: Disturbance	Electrocution
Eagle, Martial	Polemaetus bellicosus	VU	EN	16	х	х	х	х	х			
Harrier, Black	Circus maurus	VU	EN	1.9	х	х			х			
Korhaan, Southern Black	Afrotis afra	VU	VU	12		х			х	х	х	
Duck, Maccoa	Oxyura maccoa	NT	NT	1				х	х			
Sandpiper, Curlew	Calidris ferruginea	NT	LC	1.9				х	х			
Eagle, Verreaux's	Aquila verreauxii	LC	VU	13	х	х	х	х	х		х	
Flamingo, Greater	Phoenicopterus ruber	LC	NT	2.9	х			х	х		х	
Korhaan, Karoo	Eupodotis vigorsii	LC	NT	25	х	х			x	х	х	
Pipit, African Rock	Anthus crenatus	LC	NT	3.9		х				х	х	
Roller, European	Coracias garrulus	LC	NT	1		х						
Stork, Black	Ciconia nigra	LC	VU	1	х		х	х	х		х	
Bustard, Ludwig's	Neotis ludwigii	EN	EN	4.9	х	х			х	х	х	
Falcon, Lanner	Falco biarmicus	VU	LC	0	х	х		х	х			

Table 1: Priority (Red Data) species potentially occurring in the study area. VU = Vulnerable, EN = Endangered, NT = Near-threatened, LC = Least Concern.

Refer to APPENDIX 1 for a list of all species that could potentially occur in the study area.

4.2 Identification of Environmental Sensitivities

The following environmental sensitivities have been identified from an avifaunal perspective (see Figure 6 below):

- No-go areas: These are areas in close proximity to known active Verreaux's Eagle nests, where the construction of the proposed powerline and associated infrastructure will constitute a disturbance risk. No such areas are expected to be impacted by any of the proposed alignments.
- High sensitivity: Included are areas within 300m of small waterbodies, and within 500m of large waterbodies (both artificial dams and natural pans), where the proposed powerline will constitute a collision risk. These areas should ideally be avoided, or if this is not possible, there should be adequate mitigation implemented to reduce the risks materially (see Section 7 for a discussion of proposed mitigation measures). Red Data species that could be impacted through collisions with the proposed powerline due to being attracted to the surface water include Greater Flamingo, Black Stork and raptors such as Martial Eagle and Verreaux's Eagle. Many non-Red Data species could also be attracted to surface water and be at risk of collisions e.g. various species of raptors, ducks, herons, grebes and waders. Ephemeral drainage lines and their immediate environments are also included in this category. When these ephemeral drainage lines contain water they serve as flyways for waterbirds, and may temporarily attract Red Data species such as Black Stork, while standing pools of water could attract raptors for purposes of drinking and bathing, e.g. Red Data Martial Eagle and Verreaux's Eagle as well as non-Red Data raptors. These areas should likewise ideally be avoided, or if this is not possible, there should be adequate mitigation implemented to reduce the risks materially, e.g. marking with anti-collision devices.

 Medium sensitivity: The entire study area can be classified as medium-sensitive. The area is largely untransformed and the natural habitat supports a number of Red Data powerline sensitive species, notably Ludwig's Bustard and Karoo Korhaan. Ludwig's Bustard in particular is known to be highly susceptible to powerline collisions.



Figure 6: Sensitive areas from an avifaunal impact perspective

5 ISSUES, RISKS AND IMPACTS

5.1 Summary of Issues identified during the Project Notification Phase

The potential avifaunal issues identified during the BA Process include:

- Displacement of Red Data avifauna due to disturbance associated with the construction (and decommissioning) of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).
- Displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).
- Mortality of Red Data avifauna due to collisions with the earth wire of the proposed 132kV line.
- Electrocution of Red Data avifauna on the proposed 132kV line and on-site substation.

Comments received from the public and Interested and Affected Parties (I&APs) during the release of the BA Report will be provided as part of the BA Report itself, with appropriate responses.

5.2 Identification of Potential Impacts/Risks

The potential impacts identified during the BA are:

5.2.1 Construction Phase

- Potential impact 1: Displacement of Red Data avifauna due to disturbance associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).
- Potential impact 2: Displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).

5.2.2 Operational Phase

- Potential impact 3: Mortality of Red Data avifauna due to collisions with the earth wire of the proposed 132kV line.
- Potential impact 4: Electrocution of Red Data avifauna on the proposed 132kV line and in the on-site substation yard.

5.2.3 Decommissioning Phase

 Potential impact 5: Displacement of Red Data avifauna due to disturbance associated with the de-commissioning of the proposed powerline, service road and on-site substation (including laydown area and O&M Building).

5.2.4 Cumulative Impacts

- Cumulative impact 1: Displacement of Red Data avifauna due to disturbance associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building) in conjunction with existing and future similar projects.
- Cumulative impact 2: Displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed powerline, service road and on-site substation (including laydown area and O&M Building) in conjunction with existing and future similar projects.
- Mortality of Red Data avifauna due to collisions with the earth wire of the proposed 132kV line in conjunction with existing and future similar projects.

6 IMPACT ASSESSMENT

6.1 General

Negative impacts on avifauna by electricity infrastructure generally take two main forms namely electrocution and collisions (Ledger & Annegarn 1981; Ledger 1983; Ledger 1984; Hobbs and Ledger 1986a; Hobbs & Ledger 1986b; Ledger, Hobbs & Smith, 1992; Verdoorn 1996; Kruger & Van Rooyen 1998; Van Rooyen 1998; Kruger 1999; Van Rooyen 1999; Van Rooyen 2000; Van Rooyen 2004; Jenkins et al. 2010). Displacement due to habitat destruction and disturbance associated with the construction of the electricity infrastructure is another impact that could potentially impact on avifauna.

6.2 Electrocutions

Electrocution refers to the scenario where a bird is perched or attempts to perch on the electrical structure and causes an electrical short circuit by physically bridging the air gap between live components and/or live and earthed components (Van Rooyen 2004). The electrocution risk is largely determined by the pole/tower design. In the case of the proposed grid connections, no electrocution risk is envisaged because the proposed design of the 132kV line, namely the steel monopole, will not pose an electrocution threat to any of the priority species which are likely to occur at the site. Electrocutions within the proposed on-site substation yard are possible, but should not affect the more sensitive Red Data bird species, as these species are unlikely to use the infrastructure within the substation yards for perching or roosting.

There is no material difference in the risk associated with the two alternative route options, as they will both be utilising the same steel monopole design.

6.3 Collisions

Collisions are the biggest threat posed by transmission lines to birds in southern Africa (Van Rooyen 2004). Most heavily impacted upon are bustards, storks, cranes and various species of waterbirds, and to a lesser extent, vultures. These species are mostly heavy-bodied birds with limited manoeuvrability, which makes it difficult for them to take the necessary evasive action to avoid colliding with transmission lines (Van Rooyen 2004, Anderson 2001). In a recent PhD study, Shaw (2013) provides a concise summary of the phenomenon of avian collisions with transmission lines:

"The collision risk posed by power lines is complex and problems are often localised. While any bird flying near a power line is at risk of collision, this risk varies greatly between different groups of birds, and depends on the interplay of a wide range of factors (APLIC 1994). Bevanger (1994) described these factors in four main groups – biological, topographical, meteorological and technical. Birds at highest risk are those that are both susceptible to collisions and frequently exposed to power lines, with waterbirds, gamebirds, rails, cranes and bustards usually the most numerous reported victims (Bevanger 1998, Rubolini et al. 2005, Jenkins et al. 2010).

The proliferation of man-made structures in the landscape is relatively recent, and birds are not evolved to avoid them. Body size and morphology are key predictive factors of collision risk, with large-bodied birds with high wing loadings (the ratio of body weight to wing area) most at risk (Bevanger 1998, Janss 2000). These birds must fly fast to remain airborne, and do not have sufficient manoeuvrability to avoid unexpected obstacles. Vision is another key biological factor, with many collision-prone birds principally using lateral vision to navigate in flight, when it is the lower-resolution, and often restricted, forward vision that is useful to detect obstacles (Martin & Shaw 2010, Martin 2011, Martin et al. 2012). Behaviour is important, with birds flying in flocks, at low levels and in crepuscular or nocturnal conditions at higher risk of collision (Bevanger 1994). Experience affects risk, with migratory and nomadic species that spend much of their time in unfamiliar locations also expected to collide more often (Anderson 1978, Anderson 2002). Juvenile birds have often been reported as being more collision-prone than adults (e.g. Brown et al. 1987, Henderson et al. 1996).

Topography and weather conditions affect how birds use the landscape. Power lines in sensitive bird areas (e.g. those that separate feeding and roosting areas, or cross flyways) can be very dangerous (APLIC 1994, Bevanger 1994). Lines crossing the prevailing wind conditions can pose a problem for large birds that use the wind to aid take-off and landing (Bevanger 1994). Inclement weather can disorient birds and reduce their flight altitude, and strong winds can result in birds colliding with power lines that they can see but do not have enough flight control to avoid (Brown et al. 1987, APLIC 2012).

The technical aspects of power line design and siting also play a big part in collision risk. Grouping similar power lines on a common servitude, or locating them along other features such as tree lines, are both approaches thought to reduce risk (Bevanger 1994). In general, low lines with short span lengths (i.e. the distance between two adjacent pylons) and flat conductor configurations are thought to be the least dangerous (Bevanger 1994, Jenkins et al. 2010). On many higher voltage lines, there is a thin earth (or ground) wire above the conductors, protecting the system from lightning strikes. Earth wires are widely accepted to cause the majority of collisions on power lines with this configuration because they are difficult to see, and birds flaring to avoid hitting the conductors often put themselves directly in the path of these wires (Brown et al. 1987, Faanes 1987, Alonso et al. 1994a, Bevanger 1994)."

From incidental record keeping by the Endangered Wildlife Trust (EWT), it is possible to give a measure of what species are generally susceptible to power line collisions in South Africa (see Figure 7 below - Jenkins *et al.* 2010).



Figure 7: The top 10 collision prone bird species in South Africa, in terms of reported incidents contained in the Eskom/EWT Strategic Partnership central incident register 1996 - 2008 (Jenkins *et al.* 2010)

Power line collisions are generally accepted as a key threat to bustards (Raab *et al.* 2009; Raab *et al.* 2010; Jenkins & Smallie 2009; Barrientos *et al.* 2012, Shaw 2013). In a recent study, carcass surveys were performed under high voltage transmission lines in the Karoo for two years, and low voltage distribution lines for one year (Shaw 2013). Ludwig's Bustard was the most common collision victim (69% of carcasses), with bustards generally comprising 87% of mortalities recovered. Total annual mortality was estimated at 41% of the Ludwig's Bustard population, with Kori Bustards also dying in large numbers (at least 14% of the South African population killed in the Karoo alone). Karoo Korhaan was also recorded, but to a much lesser extent than Ludwig's Bustard. The reasons for the relatively low collision risk of this species probably include their smaller size (and hence greater agility in flight) as well as their more sedentary lifestyles, as local birds are familiar with their territory and are less likely to collide with power lines (Shaw 2013).

Several factors are thought to influence avian collisions, including the manoeuvrability of the bird, topography, weather conditions and power line configuration. An important additional factor that previously has received little attention is the visual capacity of birds; i.e. whether they are able to see obstacles such as power lines, and whether they are looking ahead to see obstacles with enough time to avoid a collision. In addition to helping explain the susceptibility of some species to collision, this factor is key to planning effective mitigation measures. Recent research provides the first evidence that birds can render themselves blind in the direction of travel during flight through voluntary head movements (Martin & Shaw 2010). Visual fields were determined in three bird species representative of families known to be subject to high levels of mortality associated with power lines i.e. Kori Bustards, Blue Cranes Anthropoides paradiseus and White Storks Ciconia ciconia. In all species the frontal visual fields showed narrow and vertically long binocular fields typical of birds that take food items directly in the bill under visual guidance. However, these species differed markedly in the vertical extent of their binocular fields and in the extent of the blind areas which project above and below the binocular fields in the forward-facing hemisphere. The importance of these blind areas is that when in flight, head movements in the vertical plane (pitching the head to look downwards) will render the bird blind in the direction of travel. Such movements may frequently occur when birds are scanning below them (for foraging or roost sites, or for conspecifics). In bustards and cranes pitch movements of only 25° and 35°, respectively, are

sufficient to render the birds blind in the direction of travel; in storks, head movements of 55° are necessary. That flying birds can render themselves blind in the direction of travel has not been previously recognised and has important implications for the effective mitigation of collisions with human artefacts including wind turbines and power lines. These findings have applicability to species outside of these families especially raptors (*Accipitridae*) which are known to have small binocular fields and large blind areas similar to those of bustards and cranes, and are also known to be vulnerable to power line collisions.

Despite doubts about the efficacy of line marking to reduce the collision risk for bustards (Jenkins et al. 2010; Martin et al. 2010), there are numerous studies which prove that marking a line with PVC spiral type Bird Flight Diverters (BFDs) generally reduce mortality rates (e.g. Barrientos et al. 2011; Jenkins et al. 2010; Alonso & Alonso 1999; Koops & De Jong 1982), including to some extent for bustards (Barrientos et al. 2012; Hoogstad 2015 pers.comm). Beaulaurier (1981) summarised the results of 17 studies that involved the marking of earth wires and found an average reduction in mortality of 45%. Barrientos et al. (2011) reviewed the results of 15 wire marking experiments in which transmission or distribution wires were marked to examine the effectiveness of flight diverters in reducing bird mortality. The presence of flight diverters was associated with a decrease of 55-94% in bird mortalities. Koops and De Jong (1982) found that the spacing of the BFDs was critical in reducing the mortality rates - mortality rates are reduced up to 86% with a spacing of 5m, whereas using the same devices at 10m intervals only reduces the mortality by 57%. Barrientos et al. (2012) found that larger BFDs were more effective in reducing Great Bustard collisions than smaller ones. Line markers should be as large as possible, and highly contrasting with the background. Colour is probably less important as during the day the background will be brighter than the obstacle with the reverse true at lower light levels (e.g. at twilight, or during overcast conditions). Black and white interspersed patterns are likely to maximise the probability of detection (Martin et al. 2010).

The most likely Red Data candidates for collision mortality on the proposed powerline are Ludwig's Bustards, Karoo Korhaan and Southern Black Korhaan in natural habitat, and Greater Flamingo near dams. Non-Red Data waterbirds could also be at risk near dams and where the line crosses drainage lines (see Table 1 for a list of species that could be at risk). Martial and Verreaux's Eagle might also be at risk, especially at surface water when they descend to bath and drink.

Alternative 1 is approximately 17km long and Alternative 2 approximately 44km, with both alternatives running through the same habitat. However, Alternative 2 is 61% longer than Alternative 1, and would therefore create a larger collision risk due to its considerable longer length. Alternative 1 is thus the preferred alternative from an avifaunal impact perspective, although Alternative 2 would not constitute a fatal flaw if properly mitigated.

6.4 Displacement due to habitat destruction and disturbance

During the construction of power lines, roads and substations, habitat destruction/transformation inevitably takes place. The construction activities will constitute the following:

- Site clearance and preparation:
- Construction of the infrastructure (including the on-site substation (including the O&M Building and laydown area), distribution line, service road and connection to the third-party substation);
- Transportation of personnel, construction material and equipment to the site, and personnel away from the site;
- Removal of vegetation for the proposed infrastructure;
- Excavations for infrastructure;
- Establishment of a laydown area for equipment; and

• Stockpiling of topsoil and cleared vegetation.

These activities have an impact on birds breeding, foraging and roosting in or in close proximity of the proposed on-site substation (including O&M Building and laydown area) and road construction footprints through transformation of habitat, which could result in temporary or permanent displacement. Unfortunately, very little mitigation can be applied to reduce the significance of this impact as the total permanent transformation of the natural habitat within the construction footprint of the service road, substation yard and O&M building is unavoidable. Fortunately, due to the nature of the vegetation, and judged by the existing Roggeveld / Sutherland 1 66kV sub-transmission line, very little if any vegetation clearing will be required in the 132kV powerline servitude. The habitat for Red Data species due to direct habitat transformation associated with the construction of the proposed on-site substation (including O&M Building and laydown area) and service road is likely to be fairly minimal. The species most likely to be directly affected by this impact would be small, non-Red Data species.

Apart from direct habitat destruction, the above-mentioned activities also impact on birds through disturbance; this could lead to breeding failure if the disturbance happens during a critical part of the breeding cycle. Construction activities in close proximity to breeding locations could be a source of disturbance and could lead to temporary breeding failure or even permanent abandonment of nests. A potential mitigation measure is the timeous identification of nests and the timing of the construction activities to avoid disturbance during a critical phase of the breeding cycle, although in practice that can admittedly be very challenging to implement. Large terrestrial species namely Ludwig's Bustard, Karoo Korhaan and Southern Black Korhaan are most likely to be affected by displacement due to disturbance. The ground-nesting Black Harrier could also potentially be vulnerable to this impact, but the habitat in the study area is not ideal for this species from a breeding perspective.

As far as the proposed on-site substation is concerned, the 25ha development envelope contains uniform habitat for avifauna, therefore the substation and O&M building (including the laydown area) could be located anywhere within the development envelope, with no material difference in the impact on avifauna. As far as the service road is concerned, Alternative 1 is the preferred option, as it is 61% shorter than Alternative 2, with significantly less of an impact from a habitat transformation and disturbance perspective. However, Alternative 2 would not constitute a fatal flaw.

6.5 Cumulative impacts (all phases)

The cluster of renewable energy project applications currently registered with the Department of Environmental Affairs (DEA) between Touws River and Sutherland within a 70km radius around Komsberg Substation are listed in APPENDIX 2 of this report, together with a map indicating their locality relative to the proposed development. Possible impacts by renewable energy projects on birds within this area are temporary displacement due to disturbance associated with the construction of the facilities and associated infrastructure, collisions with solar panels and wind turbines, permanent displacement due to habitat transformation, entrapment in perimeter fences, collisions with the associated power lines, and electrocutions in substation yards.

Apart from renewable energy developments, several other threats are currently facing avifauna in the natural Karoo habitat (Marnewick *et al.* 2015):

6.5.1 Overgrazing

This results in a depletion of palatable plant species, erosion, and encroachment by Karoo shrubs. The result is loss of suitable habitat and a decrease in the availability of food for large terrestrial

birds. Centre-pivot irrigated croplands using underground water are increasing and agriculture is intensifying, which may benefit some Red Data species, but not all.

6.5.2 Poisoning

Poison was used extensively in the past to control damage-causing predators, such as Black-backed Jackal *Canis mesomelas* and Caracal *Caracal caracal*, and reduced scavenging raptor populations. The use of poison may be continuing, and the potential impacts on Red Data raptor species has not been confirmed or quantified.

6.5.3 Road-kills

Many birds are commonly killed on roads, especially nocturnal species such as Spotted Eagle-Owl.

6.5.4 Powerlines

Numerous existing and new power lines are significant threats to some Red Data species. Power lines kill substantial numbers of all large terrestrial Red Data avifauna in the Karoo (Jenkins *et al.* 2010; Shaw 2013) There is currently no completely effective mitigation method to prevent collisions.

6.5.5 Climate change

Climate change scenarios for the Karoo predict slightly higher summer rainfall by 2050, and increased rainfall variability. Droughts are expected to become more severe. Climate change is predicted to have both positive and negative consequences for priority species. Increased summer rainfall could improve survival, and conversely drought years can lower long-term average survival. Large, mainly resident species dependent on rainfall are also more vulnerable to climate change. This would include the slow-breeding Red Data Verreaux's Eagle and Martial Eagle, which also exhibit extended parental care. Severe hailstorms kill priority species and could become more frequent.

6.5.6 Persecution

Although it is difficult to prove, the direct persecution of Red Data species such as Verreaux's Eagle and Martial Eagle for stock predation is still taking place (R. Visagie pers. comm).

6.5.7 Overall cumulative impact

Large raptor species, particularly Verreaux's Eagle and Martial Eagle, are potentially most at risk as far as cumulative impacts of the cluster of renewable energy projects in the 70km radius around the Komsberg Substation is concerned. However, the Rietrug grid connection should not materially threaten these species. The concern from a powerline interaction perspective is more for large terrestrial species, particularly Ludwig's Bustard, which is highly susceptible to powerline collisions. The Rietrug grid connection will add an additional 17km or 44km of HV line to the existing HV network in the area, depending on which alternative is built. Several hundred kilometres of HV line already exists within this area, and several more are planned should the renewable energy projects all be built. The overall cumulative impact of the Rietrug grid connection, when viewed with the existing impacts on avifauna, is assessed to be of moderate

significance. It could be reduced to some extent with mitigation, but will remain at a moderate level.

Indirect impacts have not been identified in this assessment. The impact assessment ratings and significance levels indicated in this section apply to both Alternatives 1 and 2 of the proposed power line and third-party substations (i.e. there is no difference between the impact assessments for both alternatives). However, discussion has been provided throughout this report in terms of preference between the two alternatives.

6.6 Potential Impacts during the Construction Phase

6.6.1 Displacement due to Habitat Transformation

Aspect/Activity	The clearing of vegetation in the proposed on-site substation yard, O&M building, laydown area and the service road						
Type of Impact (i.e. Impact Status)	Direct						
Potential Impact	Displacement of Red Data species due to permanent habitat transformation						
Status	Negative						
Mitigation Required	 A site-specific Construction Environmental Management Programme (CEMPr) must be implemented, which gives appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction and degradation of habitat. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr should specifically include the following: The minimum footprint areas for infrastructure should be used wherever possible, including road widths and lengths; No off-road driving; Maximum use of existing roads; Measures to control dust; Restricted access to the rest of the property; and Following construction, rehabilitation of all areas disturbed (e.g. temporary access tracks) must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordingly. 						
Impact Significance (Pre-Mitigation)	Low (Level 4)						
Impact Significance (Post-Mitigation)	Low (Level 4)						
I&AP Concern	None to date						

6.6.2 Displacement due to Disturbance

Aspect/Activity	Construction activities
Type of Impact (i.e. Impact Status)	Direct
Potential Impact	Displacement of Red Data species due to disturbance
Status	Negative
Mitigation Required	 A site-specific CEMPr must be implemented, which gives appropriate and detailed description of how construction activities must be conducted. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr must specifically include the following: No off-road driving; Maximum use of existing roads; Measures to control noise; Restricted access to the rest of the property; The appointed Environmental Control Officer (ECO) must be trained by an avifaunal specialist to identify the potential priority species as well as the signs that indicate possible breeding by these species. The ECO must then, during audits/site visits, make a concerted effort to look out for such breeding activities of Red Data species, and such efforts may include the training of construction astaff to identify Red Data species, followed by regular questioning of staff as to the regular whereabouts on site of these species. If any of the Breeding site must cease, and an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed; and Prior to construction, an avifaunal specialist should conduct a site walk through, covering the final service road and power line routes, to identify any nests/breeding/roosting activities around avian breeding and/or movement schedules, and lowering levels of associated noise.
Impact Significance (Pre-Mitigation)	Woderate (Level 3)
Impact Significance (Post-Mitigation)	Low (Level 4)
I&AP Concern	None to date

6.7 Potential Impacts during the Operational Phase

6.7.1 Electrocution of Red Data Avifauna

Aspect/Activity	The transmission of electricity generated from the proposed Rietrug WEF
Type of Impact (i.e. Impact Status)	Direct
Potential Impact	Electrocution of Red Data avifauna on the 132kV line and in the on-site substation
Status	Negative
Mitigation Required	• The avifaunal specialist must certify that the pole structures to be used on the proposed 132kV powerline are bird-friendly.

	• The hardware within the proposed on-site substation yard is
	too complex to warrant any mitigation for electrocution at
	this stage. It is recommended that if on-going impacts are
	recorded once operational, site specific mitigation be
	applied reactively. This is an acceptable approach because
	Red Data avifauna is unlikely to frequent the substation and
	be electrocuted.
Impact Significance (Pre-Mitigation)	Very low (Level 5)
Impact Significance (Post-Mitigation)	Very low (Level 5)
I&AP Concern	None to date

6.7.2 Mortality of Red Data Avifauna due to Collisions

Aspect/Activity	The transmission of electricity generated from the proposed Rietrug WEF							
Type of Impact (i.e. Impact Status)	Direct							
Potential Impact	Mortality of Red Data avifauna due to collisions with the earthwire of the proposed powerline							
Status	Negative							
Mitigation Required	 An avifaunal specialist must conduct a site walk through of final pylon positions prior to construction to determine if, and where, BFDs are required. Install BFDs as per the instructions of the specialist following the site walk through, which may include the need for modified BFDs fitted with solar powered LED lights on certain spans. The operational monitoring programme must include regular monitoring (i.e. quarterly) of the grid connection power line for collision mortalities. 							
Impact Significance (Pre-Mitigation)	High (Level 2)							
Impact Significance (Post-Mitigation)	Moderate (Level 3)							
I&AP Concern	None to date							

6.8 Potential Impacts during the Decommissioning Phase

6.8.1 Displacement due to Disturbance

Aspect/Activity	Removal of the proposed infrastructure during decommissioning							
Type of Impact (i.e. Impact Status)	Direct							
Potential Impact	Displacement of Red Data species due to disturbance							
Status	Negative							
Mitigation Required	 A site-specific Decommissioning EMPr (DEMPr) must be implemented, which gives appropriate and detailed description of how decommissioning activities must be conducted to reduce unnecessary destruction of habitat. All contractors are to adhere to the DEMPr and should apply good environmental practice during decommissioning. Following decommissioning, rehabilitation of all areas disturbed must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordingly. 							
Impact Significance (Pre-Mitigation)	Moderate (Level 3)							
Impact Significance (Post-Mitigation)	Low (Level 4)							
I&AP Concern	None to date							

6.9 Cumulative Impacts

Aspect/Activity	The incremental impact of the proposed on-site substation (including the O&M Building and laydown area), service road and powerline on Red Data avifauna added to the impacts of other past, present or reasonably foreseeable future activities.
Type of Impact (i.e. Impact Status)	Cumulative
Potential Impact	Temporary displacement of Red Data avifauna due to disturbance associated with the construction of the proposed on- site substation (including the O&M Building and laydown area), service road and powerline; permanent displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed powerline, service road and on-site substation (including the O&M Building and laydown area), and mortality of Red Data avifauna due to collisions with the powerline, and electrocutions in the substation yard.
Status	Negative
Mitigation Required	• Please refer to all the proposed mitigation measures as listed in the preceding tables in Section 6 for all the impacts and all the phases.
Impact Significance (Pre-Mitigation)	Moderate risk (Level 3)
Impact Significance (Post-Mitigation)	Moderate risk (Level 3)
I&AP Concern	None to date

6.10 No-go option

The no-go option will result in no additional impacts on avifauna and will result in the ecological status quo being maintained (as described in Section 4 of this report).

7 IMPACT ASSESSMENT TABLES

The assessment of impacts and recommendation of mitigation measures as discussed above are collated in Tables 2 to 5 below.

Construction Ph	nase												
Direct Impacts													
act	f bact/				eo	۲	t ,	lity		Significanc and	of act/	evel	
Aspect/ Imp Pathway	Nature o Potential Imp Risk	Status	Spatial Extent	Duration	Consequen	Probabilit	Reversibili of Impac	Irreplaceabi	Potentia Mitigatio Measure:	Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)	Ranking c Residual Imp Risk	Confidence L
The clearing of vegetation for the proposed on-site substation yard, O&M Building, laydown area, and the service road	Displacement of Red Data species due to permanent habitat transformatio n	Negative	Site Spec ific	Long term	Extreme	Very unlikel y	High reversibility	Replace able	 A site-specific CEMPr must be implemented, which gives appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction and degradation of habitat. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr should specifically include the following: The minimum footprint areas for infrastructure should be used wherever possible, including road widths and lengths; No off-road driving; Maximum use of existing roads; Measures to control dust; Restricted access to the rest of the property; Following construction, rehabilitation of all areas disturbed (e.g. temporary access tracks) must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordinaly. 	Low risk (4)	Low risk (4)	Low risk (4)	High

Table 2: Impact Assessment Summary Table for the Construction Phase

Construction Ph	Construction Phase												
Direct Impacts													
pact	of pact/				Элсе	5	ity	ility	Potential Mitigation Measures	Significance of Impact and Risk		of pact/	Level
Aspect/ Im Pathway	Nature c Potential Im Risk	Status	Spatial Extent	Duration	Consequer	Probabili	Reversibil of Impac	Irreplaceab		Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)	Ranking Residual Im Risk	Confidence
Construction of the proposed on- site substation (including the laydown area and O&M Building), service road and powerline	Displacement of Red Data species due to disturbance	Negative	Site	Short term	Substant ial	Likely	Highly reversible	Replace	 A site-specific CEMPr must be implemented, which gives appropriate and detailed description of how construction activities must be conducted. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr must specifically include the following: No off-road driving; Maximum use of existing roads; Measures to control noise; Restricted access to the rest of the property; The appointed ECO must be trained by an avifaunal specialist to identify the potential priority species as well as the signs that indicate possible breeding by these species. The ECO must then, during audits/site visits, make a concerted effort to look out for such breeding activities of Red Data species, and such efforts may include the training of construction staff to identify Red Data species, followed by regular questioning of staff as to the regular whereabouts on site of these species. If any of the Red Data species are confirmed to be breeding (e.g. if a nest site is found), construction activities within 500m of the breeding site must cease and 	Moderate risk (3)	Low risk (4)	Low Risk (4)	High

Construction Ph	Construction Phase												
Direct Impacts	Direct Impacts												
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significanc and Without Mitigation/ Management	e of Impact Risk With Mitigation/ Management (Residual Impact/ Risk)	Ranking of Residual Impact/ Risk	Confidence Level
									 an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed. Prior to construction, an avifaunal specialist should conduct a site walk through, covering the final service road and power line routes, to identify any nests/breeding/roosting activity of priority species, as well as any additional sensitive habitats. The results of which may inform the final construction schedule in close proximity to that specific area, including abbreviating construction time, scheduling activities around avian breeding and/or movement schedules, and lowering levels of associated noise. 				

Operational Phase											
Direct Impacts											
ict	ntial k	tial k			e		~	ity	Significance of Impact and Risk B	svel	
Aspect/ Impa Pathway	Nature of Pote Impact/ Ris	Status	Spatial Extent	Duration	Consequenc	Probability	Reversibilit of Impact	Irreplaceabil	Mitigation/ Mitidation/ Mutiga	Confidence Le	
The transmission of electricity generated by the proposed Rietrug WEF	Electrocution of Red Data avifauna on the 132kV line and in the on- site substation	Negative	Local	Long term	Severe	Extremely unlikely	High	Replace able	 The avifaunal specialist must certify that the proposed pole structures to be used on the 132kV powerline are bird-friendly. The hardware within the proposed on-site substation yard is too complex to warrant any mitigation for electrocution at this stage. It is recommended that if on-going impacts are recorded once operational, site specific mitigation be applied reactively. This is an acceptable approach because Red Data avifauna is unlikely to frequent the substation and be electrocuted. Very low risk (5) 	High	

Table 3: Impact Assessment Summary Table for the Operational Phase

Operational Phase										
Direct Impacts										
ct	, v				e,	_	~	ity	Significance of Impact	svel
Aspect/ Impa Pathway	Nature of Pote Impact/ Risl	Status	Spatial Extent	Duration	Consequenc	Probability	Reversibility of Impact	Irreplaceabil	Ranking of Resi Impact/ Risk	Confidence Le
The transmission of electricity generated by the proposed Rietrug WEF	Mortality of Red Data avifauna due to collisions with the earthwire of the proposed powerline	Negative	Local	Long term	Severe	Likely	High	Replace able	 An avifaunal specialist must conduct a site walk through of final pylon positions prior to construction to determine if, and where, BFDs are required. Install BFDs as per the instructions of the specialist following the site walk through, which may include the need for modified BFDs fitted with solar powered LED lights on certain spans. The operational monitoring programme must include regular (quarterly) monitoring of the grid connection power line for collision mortalities. 	High

Table 4: Impact Assessment Summary Table for the Decommissioning Phase

Decommissioning Phase

Direct Impacts	Direct Impacts												
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significan and Without Mitigation/ Management	ce of Impact d Risk With Mitigation/ Management (Residual Impact/ Risk)	Ranking of Residual Impact/ Risk	Confidence Level
Removal of the infrastructure	Displacement of Red Data species due to disturbance	Negative	Site Spec ific	Short term	Substantial	Likely	Highly reversible	Replace able	 A site-specific DEMPr must be implemented, which gives appropriate and detailed description of how decommissioning activities must be conducted to reduce unnecessary destruction of habitat. All contractors are to adhere to the DEMPr and should apply good environmental practice during decommissioning. Following decommissioning, rehabilitation of all areas disturbed must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordingly. 	Moderate risk (3)	Low risk (4)	Low risk (4)	Medium

Table 5: Cumulative Impact Assessment Summary Table

Cumulative In	Cumulative Impacts (Construction, Operational and Decommissioning Phases)												
Direct Impact	S												
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significa ar Without Mitigation/ Management	nce of Impact nd Risk With Mitigation/ Management (Residual Impact/ Risk)	Ranking of Residual Impact/ Risk	Confidence Level
The incremental impact of the proposed on-site substation (including the 0&M Building and laydown area), service road and powerline on Red Data avifauna added to the impacts of other past, present or reasonably foreseeable future activities.	Temporary displacement of Red Data avifauna due to disturbance associated with the construction of the proposed on-site substation (including O&M Building and laydown area), service road and powerline; permanent displacement of Red Data avifauna due to habitat transformation associated with the construction of the proposed power line, service road and on-site	Negative	Local	Long term	Substantial	Very likely	High	Replaceable	 Please refer to all the proposed mitigation measures as listed in the impact tables in Section 6 for all impacts in all the phases. 	Moderate risk (3)	Moderate risk (3)	Moderate risk (3)	Low

Cumulative Impacts (Construction, Operational and Decommissioning Phases)														
Direct Impacts	Direct Impacts													
g	ntial	k	ntial <			a	_	~	ity		Significa ar	nce of Impact Id Risk	k	evel
Aspect/ Impa Pathway	Nature of Pote Impact/ Risl	Status	Spatial Extent	Duration	Consequenc	Probability	Reversibility of Impact	Irreplaceabili	Potential Mitigation Measures	Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)	Ranking of Resi Impact/ Risl	Confidence Le	
	substation (including O&M Building and laydown area); and mortality of Red Data avifauna due to collisions with the powerline, and electrocutions in the substation yard.													

7.1 Impact Assessment Summary

Table 6 below provides an indication of the overall impact significance with the implementation of mitigation measures for the various phases.

Phase	Overall Impact Significance
Construction	Low (Level 4)
Operational	Very Low (Level 5) to Moderate
	(Level 3)
Decommissioning	Low (Level 4)
Nature of Impact	Overall Impact Significance
Cumulative	Moderate (Level 3)

Table 6: Overall Impact Significance (Post Mitigation)

8 LEGISLATIVE AND PERMIT REQUIREMENTS

8.1 Legislative Framework

There is no legislation pertaining specifically to the impact of wind facilities and associated electrical infrastructure on avifauna. There are best practice guidelines available which were compiled under the auspices of Birdlife South Africa (BLSA) and the Endangered Wildlife Trust (EWT) i.e. Jenkins A R; Van Rooyen C S; Smallie J J; Anderson M D & Smit H A. 2011. Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa. Endangered Wildlife Trust and Birdlife South Africa. These guidelines have been updated on several occasions, with the latest version released in 2015.

8.1.1 Agreements and conventions

Table 7 below lists international agreements and conventions which South Africa is party to and which is relevant to the conservation of avifauna¹.

Table 7: Agreements and conventions which South Africa is party to and which is relevant to the conservation of avifauna.

Convention name	Description	Geographic scope
African-Eurasian Waterbird Agreement (AEWA)	The Agreement on the Conservation of AEWA is an intergovernmental treaty dedicated to the conservation of migratory waterbirds and their habitats across Africa, Europe, the Middle East, Central Asia, Greenland and the Canadian Archipelago. Developed under the framework of the Convention on Migratory Species (CMS) and administered by the United Nations Environment Programme (UNEP), AEWA brings together countries and the wider international conservation community in an effort to establish coordinated conservation and management of migratory waterbirds	Regional

¹ (BirdLife International (2016) Country profile: South Africa. Available from: http://www.birdlife.org/datazone/country/south_africa. Checked: 2016-04-02).

Convention name	Description	Geographic scope
	throughout their entire migratory range.	
Convention on Biological Diversity (CBD), Nairobi, 1992	The Convention on Biological Diversity (CBD) entered into force on 29 December 1993. It has 3 main objectives: The conservation of biological diversity The sustainable use of the components of biological diversity; and The fair and equitable sharing of the benefits arising out of the utilization of genetic resources.	Global
Convention on the Conservation of Migratory Species of Wild Animals, (CMS), Bonn, 1979	As an environmental treaty under the aegis of the UNEP, CMS provides a global platform for the conservation and sustainable use of migratory animals and their habitats. CMS brings together the States through which migratory animals pass, the Range States, and lays the legal foundation for internationally coordinated conservation measures throughout a migratory range.	Global
Convention on the International Trade in Endangered Species of Wild Flora and Fauna, (CITES), Washington DC, 1973	CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.	Global
Ramsar Convention on Wetlands of International Importance, Ramsar, 1971	The Convention on Wetlands, called the Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.	Global
Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia	The Signatories will aim to take co-ordinated measures to achieve and maintain the favourable conservation status of birds of prey throughout their range and to reverse their decline when and where appropriate.	Regional

8.1.2 National legislation

8.1.2.1 Constitution of the Republic of South Africa, 1996

The Constitution of the Republic of South Africa provides in the Bill of Rights that: Everyone has the right -

- (a) to an environment that is not harmful to their health or well-being; and
- (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that -
 - (i) prevent pollution and ecological degradation;
 - (ii) promote conservation; and
 - (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

8.1.2.2 The National Environmental Management Act 107 of 1998

The National Environmental Management Act 107 of 1998 (as amended) (NEMA) creates the legislative framework for environmental protection in South Africa, and is aimed at giving effect to the environmental right in the Constitution. It sets out a number of guiding principles that apply to the actions of all organs of state that may significantly affect the environment. Sustainable

development (socially, environmentally and economically) is one of the key principles, and internationally accepted principles of environmental management, such as the precautionary principle and the polluter pays principle, are also incorporated.

NEMA also provides that a wide variety of listed developmental activities (via the promulgation of the EIA Regulations (2014, as amended), which may significantly affect the environment, may be performed only after an EIA has been done and authorisation has been obtained from the relevant authority. Many of these listed activities can potentially have negative impacts on bird populations in a variety of ways. The clearance of natural vegetation, for instance, can lead to a loss of habitat and may depress prey populations, while erecting structures needed for generating and distributing energy, communication, and so forth can cause mortalities by collision or electrocution.

8.1.2.3 The National Environmental Management: Biodiversity Act 10 of 2004 and the Threatened or Protected Species Regulations, February 2007

The most prominent statute containing provisions directly aimed at the conservation of birds is the National Environmental Management: Biodiversity Act (Act 10 of 2004, as amended) read with the Threatened or Protected Species Regulations, February 2007 (TOPS Regulations). Chapter 1 sets out the objectives of the Act, and they are aligned with the objectives of the Convention on Biological Diversity, which are the conservation of biodiversity, the sustainable use of its components, and the fair and equitable sharing of the benefits of the use of genetic resources. The Act also gives effect to CITES, the Ramsar Convention, and the Bonn Convention on Migratory Species of Wild Animals (as noted in Table 7 above). The State is endowed with the trusteeship of biodiversity and has the responsibility to manage, conserve and sustain the biodiversity of South Africa.

9 ENVIRONMENTAL MANAGEMENT PROGRAMME INPUTS

Refer to APPENDIX 3 for the EMPr inputs. Below in Table 8 is a summary of the <u>key monitoring</u> <u>recommendations</u> contained in the EMPr specifically pertaining to avifauna. It is important to note that a comprehensive EMPr is included in Appendix G of the BA Report, which includes input from all specialists in this regard.

Monitoring requirement	Frequency	Responsibility
 Avifaunal specialist must conduct a quarterly walk-through of the grid connection to assess the level of collision mortality of avifauna. Prior to construction, an avifaunal specialist should conduct a site walk through, covering the final service road and power line routes, to identify any nests/breeding/roosting activity of priority species, as well as any additional sensitive babitats 	Quarterly Once before construction commences	Avifaunal specialist

 Table 8: Key monitoring requirements contained in the EMPr

10 CONCLUSION AND RECOMMENDATIONS

The proposed Rietrug grid connection will have the following potential impacts on avifauna:

- Displacement due to habitat transformation in the footprint of the proposed on-site substation, O&M building laydown area, power line and service road;
- Displacement due to the construction of the proposed on-site substation, O&M building, laydown area, service road and 132kV powerline;
- Electrocution on the proposed 132kV powerline and in the on-site substation; and
- Mortality due to collision with the earthwire of the proposed 132kV powerline.

10.1 Displacement due to habitat transformation

Habitat transformation has an impact on birds breeding, foraging and roosting in or in close proximity of the proposed on-site substation (inclusive of the O&M Building and laydown area) and service road construction footprints, which could result in temporary or permanent displacement. Unfortunately, very little mitigation can be applied to reduce this impact as the total permanent transformation of the natural habitat within the construction footprint of the proposed service road, substation yard and O&M building is unavoidable. However, due to the nature of the vegetation, and judged by the existing Roggeveld / Sutherland 1 66kV sub-transmission line, very little if any vegetation clearing will be required in the 132kV powerline servitude. The habitat in the study area is very uniform from a bird impact perspective, therefore the loss of habitat for Red Data species due to direct habitat transformation associated with the construction of the proposed on-site substation, O&M building and service road is likely to be fairly minimal. The impact significance is assessed to be Low, both before and after mitigation. The species most likely to be directly affected by this impact would be small, non-Red Data species. The 25ha development envelope (for the proposed on-site substation, O&M Building and laydown area) contains uniform habitat for avifauna, therefore the proposed on-site substation and O&M building could be located anywhere within the development envelope, with no material difference in the impact on avifauna. As far as the proposed service road is concerned, both alternatives are acceptable from an avifaunal impact perspective, but Alternative 1 is the preferred option, as it is approximately 61% shorter than Alternative 2, with significantly less of an impact from a habitat transformation perspective. Suggested mitigation measures are restricting footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control dust, restricted access to the rest of the property, and rehabilitation of all areas disturbed.

10.2 Displacement due to disturbance

Apart from direct habitat destruction, construction activities also impact on birds through disturbance; this could lead to breeding failure if the disturbance happens during a critical part of the breeding cycle. Construction activities in close proximity to breeding locations could be a source of disturbance and could lead to temporary breeding failure or even permanent abandonment of nests. A potential mitigation measure is the timeous identification of nests and the timing of the construction activities to avoid disturbance during a critical phase of the breeding cycle. Large terrestrial species, including Red Data Ludwig's Bustard, Karoo Korhaan and Southern Black Korhaan, are most likely to be affected by displacement due to disturbance. The groundnesting Black Harrier could also potentially be vulnerable to this impact, but the habitat in the study area is not ideal for this species from a breeding perspective. Although both options are acceptable from an avifaunal impact perspective as far as the service road and the powerline is concerned, Alternative 1 is the preferred option, as it is 61% shorter than Alternative 2, with significantly less of an impact from a disturbance perspective. The impact is assessed to be Moderate before mitigation, and Low after mitigation. Suggested mitigation measures are

restricting footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control noise, restricted access to the rest of the property, training the ECO to identify Red Data nests during construction, and a pre-construction walk-through by the avifaunal specialist to identify and Red Data nests coupled with the timing of the construction if need be.

10.3 Electrocution

In the case of the proposed grid connections, no electrocution risk is envisaged because the proposed design of the 132kV line, namely the steel monopole, will not pose an electrocution threat to any of the priority species which are likely to occur at the site. Electrocutions within the proposed on-site substation yard are possible, but should not affect the more sensitive Red Data bird species, as these species are unlikely to use the infrastructure within the substation yards for perching or roosting. There is no material difference in the risk associated with the two alternative route options, as they will both be utilising the same steel monopole design. Suggested mitigation measures are certification of the proposed powerline design as bird-friendly by the avifaunal specialist before construction commences, and reactive mitigation in the substation if electrocutions are recorded. The risk is assessed to be Very Low, both before and after mitigation.

10.4 Collisions

The most likely Red Data candidates for collision mortality on the proposed powerline are Ludwig's Bustards, Karoo Korhaan and Southern Black Korhaan in natural habitat, and Greater Flamingo near dams. Non-Red Data waterbirds could also be at risk near dams and where the line crosses drainage lines (see Table 1 for a list of species that could be at risk). Martial and Verreaux's Eagle might also be at risk, especially at surface water when they descend to bath and drink. Alternative 1 is approximately 17km long and Alternative 2 approximately 44km, with both alternatives running through the same habitat. However, Alternative 2 is 61% longer than Alternative 1, and would therefore create a larger collision risk due to its considerable longer length. Alternative 1 is thus the preferred alternative from an avifaunal impact perspective although both alternatives are acceptable provided the proposed anti-collision mitigation is implemented. Suggested mitigation measures are a walk-through by the avifaunal specialist of the final alignment to identify sections that require mitigation, the fitting of BFDs on those pre-identified sections and quarterly line inspections by the avifaunal specialist to record collision-related mortality. The risk is assessed to be High, but it can be reduced to Moderate through the application of mitigation measures.

10.5 Cumulative impacts

Large raptor species, particularly Verreaux's Eagle and Martial Eagle, are potentially most at risk as far as cumulative impacts of the cluster of renewable energy projects in the 70km radius around the Komsberg Substation is concerned. However, the Rietrug grid connection should not materially threaten these species. The concern from a powerline interaction perspective is more for large terrestrial species, particularly Ludwig's Bustard, which is highly susceptible to powerline collisions. The Rietrug grid connection will add an additional 17km or 44km of HV line to the existing HV network in the area, depending on which alternative is built. Several hundred kilometres of HV line already exists within this area, and several more are planned should the renewable energy projects all be built. The overall cumulative impact of the Rietrug grid connection, when viewed with the existing impacts on avifauna, is assessed to be Moderate, and is likely remain at that level after mitigation.

Table 9 below provides a summary of the respective significance ratings, and an average overall rating before and after mitigation.

Impact	Rating pre-mitigation	Rating post-mitigation					
Displacement due to habitat	Low (4)	Low (4)					
transformation							
Displacement due to disturbance	Moderate (3)	Low (4)					
Electrocution	Very Low (5)	Very Low (5)					
Collisions	High (2)	Moderate (3)					
Cumulative impacts	Moderate (3)	Moderate (3)					
Average:	Moderate to Low (3.4)	Low to Moderate (3.8)					

11 FINAL SPECIALIST STATEMENT AND AUTHORISATION RECOMMENDATION

The overall potential impact on Red Data avifauna for the construction phase is assessed to be of Moderate to Low significance before mitigation measures, and Low after the implementation of mitigation measures. For the decommissioning phase, the overall potential impact on Red Data avifauna is assessed with a Moderate significance before the implementation of mitigation and a Low significance after the implementation of mitigation measures. For the operational phase, the overall potential impact on Red Data avifauna is assessed with a Very Low to High significance without the implementation of mitigation measures; and Very Low to Moderate significance with the implementation of mitigation measures. Cumulative impacts are assessed with a Moderate significance both with and without mitigation measures. In terms of <u>an average</u>, the pre-mitigation significance of all potential impacts identified in this specialist study is assessed as Moderate to Low, leaning more towards Moderate (i.e. average of 3.4, as shown in Table 9 above) and the post-mitigation significance is assessed as Low to Moderate, leaning more towards Low (i.e. average of 3.8, as shown in Table 9 above). It is therefore recommended that the activity is authorised, on condition that the proposed mitigation measures as detailed in the EMPr (APPENDIX 3) are strictly implemented.

11.1 EA Condition Recommendations

The proposed mitigation measures are detailed in the EMPr (APPENDIX 3)

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APPENDIX 1: LIST OF SPECIES POTENTIALLY OCCURRING IN THE STUDY AREA

No	Common name	Taxonomic name	Global status	Local status	Reporting rate SABAP2
1	Avocet, Pied	Recurvirostra avosetta			3.88
2	Barbet, Acacia Pied	Tricholaema leucomelas			3.88
3	Batis, Pririt	Batis pririt			2.91
4	Bee-eater, European	Merops apiaster			3.88
5	Bishop, Southern Red	Euplectes orix			1.94
6	Bokmakierie	Telophorus zeylonus			55.34
7	Bulbul, African Red-eyed	Pycnonotus nigricans			2.91
8	Bulbul, Cape	Pycnonotus capensis			2.91
9	Bunting, Cape	Emberiza capensis			62.14
10	Bunting, Lark-like	Emberiza impetuani			37.86
11	Bustard, Ludwig's	Neotis Iudwigii	EN	EN	4.85
12	Buzzard, Jackal	Buteo rufofuscus			40.78
13	Buzzard, Steppe	Buteo vulpinus			4.85
14	Canary, Black-headed	Serinus alario			30.1
16	Canary, White-throated	Crithagra albogularis			29.13
17	Canary, Yellow	Crithagra flaviventris			47.57
18	Chat, Anteating	Myrmecocichla formicivora			5.83
19	Chat, Familiar	Cercomela familiaris			20.39
20	Chat, Karoo	Cercomela schlegelii			33.01
21	Chat, Sickle-winged	Cercomela sinuata			57.28
22	Chat, Tractrac	Cercomela tractrac			1.94
23	Cisticola, Grey-backed	Cisticola subruficapilla			57.28
25	Coot, Red-knobbed	Fulica cristata			8.74
26	Cormorant, Reed	Phalacrocorax africanus			0.97
27	Cormorant, White-breasted	Phalacrocorax carbo			3.88
34	Crombec, Long-billed	Sylvietta rufescens			9.71
35	Crow, Pied	Corvus albus			28.16
36	Cuckoo, Diderick	Chrysococcyx caprius			0.97
38	Dove, Laughing	Streptopelia senegalensis			3.88
39	Dove, Namaqua	Oena capensis			4.85
40	Dove, Red-eyed	Streptopelia semitorquata			15.53
42	Duck, African Black	Anas sparsa			7.77
43	Duck, Maccoa	Oxyura maccoa	NT	NT	0.97
44	Duck, Yellow-billed	Anas undulata			19.42

No	Common name	Taxonomic name	Global status	Local status	Reporting rate SABAP2
45	Eagle, Booted	Aquila pennatus			6.8
46	Eagle, Martial	Polemaetus bellicosus	VU	EN	15.53
47	Eagle, Verreaux's	Aquila verreauxii	LC	VU	12.62
48	Eagle-owl, Spotted	Bubo africanus			3.88
49	Eremomela, Karoo	Eremomela gregalis			22.33
50	Eremomela, Yellow-bellied	Eremomela icteropygialis			22.33
57	Fiscal, Common (Southern)	Lanius collaris			31.07
59	Flamingo, Greater	Phoenicopterus ruber	LC	NT	2.91
61	Flycatcher, Chat	Bradornis infuscatus			3.88
62	Flycatcher, Fairy	Stenostira scita			10.68
63	Flycatcher, Fiscal	Sigelus silens			0.97
64	Francolin, Grey-winged	Scleroptila africanus			22.33
65	Goose, Egyptian	Alopochen aegyptiacus			33.98
66	Goose, Spur-winged	Plectropterus gambensis			10.68
67	Goshawk, Southern Pale Chanting	Melierax canorus			32.04
68	Grebe, Black-necked	Podiceps nigricollis			3.88
69	Grebe, Little	Tachybaptus ruficollis			9.71
70	Greenshank, Common	Tringa nebularia			5.83
73	Hamerkop	Scopus umbretta			3.88
74	Harrier, Black	Circus maurus	VU	EN	1.94
76	Heron, Black-headed	Ardea melanocephala			6.8
77	Heron, Grey	Ardea cinerea			5.83
80	House-martin, Common	Delichon urbicum			0.97
81	Ibis, African Sacred	Threskiornis aethiopicus			4.85
82	Ibis, Hadeda	Bostrychia hagedash			28.16
84	Kestrel, Greater	Falco rupicoloides			0.97
85	Kestrel, Lesser	Falco naumanni			0.97
86	Kestrel, Rock	Falco rupicolus			41.75
89	Kite, Black-shouldered	Elanus caeruleus			0.97
92	Korhaan, Karoo	Eupodotis vigorsii	LC	NT	25.24
93	Korhaan, Southern Black	Afrotis afra	VU	VU	11.65
94	Lapwing, Blacksmith	Vanellus armatus			18.45
95	Lapwing, Crowned	Vanellus coronatus			11.65
100	Lark, Cape Clapper	Mirafra apiata			26.21
105	Lark, Karoo	Calendulauda albescens			17.48

No	Common name	Taxonomic name	Global status	Local status	Reporting rate SABAP2
106	Lark, Karoo Long-billed	Certhilauda subcoronata			35.92
107	Lark, Large-billed	Galerida magnirostris			56.31
108	Lark, Red-capped	Calandrella cinerea			27.18
109	Lark, Sabota	Calendulauda sabota			1.94
110	Lark, Spike-heeled	Chersomanes albofasciata			14.56
112	Martin, Brown-throated	Riparia paludicola			3.88
113	Martin, Rock	Hirundo fuligula			35.92
114	Masked-weaver, Southern	Ploceus velatus			22.33
115	Moorhen, Common	Gallinula chloropus			0.97
116	Mousebird, Red-faced	Urocolius indicus			5.83
117	Mousebird, White-backed	Colius colius			4.85
118	Nightjar, Rufous-cheeked	Caprimulgus rufigena			0.97
121	Penduline-tit, Cape	Anthoscopus minutus			15.53
122	Pigeon, Speckled	Columba guinea			36.89
123	Pipit, African	Anthus cinnamomeus			14.56
124	Pipit, African Rock	Anthus crenatus	LC	NT	3.88
125	Pipit, Long-billed	Anthus similis			0.97
126	Plover, Kittlitz's	Charadrius pecuarius			7.77
127	Plover, Three-banded	Charadrius tricollaris			30.1
131	Prinia, Karoo	Prinia maculosa			41.75
132	Quail, Common	Coturnix coturnix			1.94
133	Raven, White-necked	Corvus albicollis			55.34
134	Reed-warbler, African	Acrocephalus baeticatus			0.97
135	Robin-chat, Cape	Cossypha caffra			9.71
136	Roller, European	Coracias garrulus	LC	NT	0.97
137	Ruff	Philomachus pugnax			0.97
138	Sandgrouse, Namaqua	Pterocles namaqua			28.16
139	Sandpiper, Curlew	Calidris ferruginea	NT	LC	1.94
141	Scrub-robin, Karoo	Cercotrichas coryphoeus			51.46
143	Seedeater, Streaky-headed	Crithagra gularis			0.97
144	Shelduck, South African	Tadorna cana			30.1
145	Shoveler, Cape	Anas smithii			12.62
148	Snake-eagle, Black-chested	Circaetus pectoralis			1.94
149	Sparrow, Cape	Passer melanurus			36.89
150	Sparrow, House	Passer domesticus			14.56

No	Common name	Taxonomic name	Global status	Local status	Reporting rate SABAP2
152	Sparrow, Southern Grey- headed	Passer diffusus			2.91
154	Sparrowhawk, Rufous- chested	Accipiter rufiventris			0.97
155	Sparrowlark, Black-eared	Eremopterix australis			3.88
157	Spoonbill, African	Platalea alba			1.94
158	Spurfowl, Cape	Pternistis capensis			16.5
159	Starling, Common	Sturnus vulgaris			10.68
160	Starling, Pale-winged	Onychognathus nabouroup			19.42
161	Starling, Pied	Spreo bicolor			36.89
162	Starling, Red-winged	Onychognathus morio			2.91
164	Stilt, Black-winged	Himantopus himantopus			5.83
165	Stint, Little	Calidris minuta			2.91
166	Stonechat, African	Saxicola torquatus			1.94
167	Stork, Black	Ciconia nigra	LC	VU	0.97
170	Sunbird, Dusky	Cinnyris fuscus			4.85
171	Sunbird, Malachite	Nectarinia famosa			12.62
172	Sunbird, Southern Double- collared	Cinnyris chalybeus			8.74
173	Swallow, Barn	Hirundo rustica			28.16
174	Swallow, Greater Striped	Hirundo cucullata			29.13
176	Swallow, White-throated	Hirundo albigularis			4.85
177	Swift, African Black	Apus barbatus			0.97
178	Swift, Alpine	Tachymarptis melba			4.85
179	Swift, Common	Apus apus			1.94
180	Swift, Horus	Apus horus			0.97
181	Swift, Little	Apus affinis			9.71
182	Swift, White-rumped	Apus caffer			12.62
183	Teal, Cape	Anas capensis			5.83
184	Teal, Red-billed	Anas erythrorhyncha			4.85
186	Thick-knee, Spotted	Burhinus capensis			1.94
190	Tit, Grey	Parus afer			17.48
191	Tit-babbler, Chestnut- vented	Parisoma subcaeruleum			4.85
192	Tit-babbler, Layard's	Parisoma layardi			13.59
193	Turtle-dove, Cape	Streptopelia capicola			34.95
196	Wagtail, Cape	Motacilla capensis			39.81
197	Warbler, Namaqua	Phragmacia substriata			3.88
No	Common name	Taxonomic name	Global status	Local status	Reporting rate SABAP2
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198	Warbler, Rufous-eared	Malcorus pectoralis			35.92
200	Waxbill, Common	Estrilda astrild			10.68
201	Weaver, Cape	Ploceus capensis			17.48
203	Wheatear, Mountain	Oenanthe monticola			43.69
204	White-eye, Cape	Zosterops virens			2.91
206	Woodpecker, Cardinal	Dendropicos fuscescens			0.97
207	Woodpecker, Ground	Geocolaptes olivaceus			17.48

BIRD IMPACT ASSESSMENT STUDY

APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION

	APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION								
Proposed Development Name	DEA Reference	Current EA Status	Proponent	Extent	Proposed Capacity	Proposed Mitigation Measures for avifaunal impacts as detailed in the relevant specialist reports (Note that only the mitigation measures specified for the Sutherland, Sutherland 2 and Rietrug Electrical Grid Infrastructure BAs need to be addressed by Mainstream for these BA Processes)			
Proposed 280 MW Gunstfontein Wind Energy Project	14/12/16/3/3/2/395	S&EIR	Networx Eolos Renewables (Pty) Ltd	12 000	280 MW	 Pre-construction monitoring Delineation of suitable buffer zones Post-construction monitoring 			
Proposed development of renewable energy facility at 3 x Sutherland wind farm sites, Western and Northern Cape. (Replaced by Rietrug, Sutherland and Sutherland 2 WEFs issued Nov 2016)	12/12/20/1782/AM1 12/12/20/1782/1 12/12/20/1782/2 12/12/20/1782/3	S&EIR	Mainstream Power Sutherland	28 600	420 MW	 Delineation of no-go zones and pre- construction monitoring. On-site demarcation of 'no-go' areas identified during pre-construction monitoring must be undertaken to minimise disturbance impacts associated with the construction of the facility. Schedule maintenance activities to avoid disturbances in sensitive areas (identified through operational monitoring). Carefully monitoring the local avifauna pre- and post-construction monitoring must be undertaken. Excluding development from within 500 m of the edge of the escarpment along its entire length through the development area to reduce collision risk, primarily for slope soaring raptors. 			
Proposed Hidden Valley Wind Energy Facility, Northern Cape	12/12/20/2370/2	S&EIR	Hidden Valley Wind - African Clean Energy Developments (Pty) Ltd	9 530	150 MW	 Implement exclusion zones In high sensitivity zones Implement post-construction monitoring Curtailment of turbines if need be Nest searches Control of staff and equipment to prevent disturbance 			

	APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION								
Proposed Hidden Valley Wind Energy Facility, Northern Cape	12/12/20/2370/3	S&EIR	Hidden Valley Wind - African Clean Energy Developments (Pty) Ltd	9 180	150 MW	 Implement exclusion zones In high sensitivity zones Implement post-construction monitoring Curtailment of turbines if need be Nest searches Control of staff and equipment to prevent disturbance 			
Proposed Hidden Valley Wind Energy Facility, Northern Cape	12/12/20/2370/1	S&EIR	Hidden Valley Wind - African Clean Energy Developments (Pty) Ltd	16 620	150MW	 Implement exclusion zones In high sensitivity zones Implement post-construction monitoring Curtailment of turbines if need be Nest searches Control of staff and equipment to prevent disturbance 			
Proposed Hidden Valley Wind Energy Facility, Northern Cape	12/12/20/2370	S&EIR	Hidden Valley Wind - African Clean Energy Developments (Pty) Ltd		650 MW	 Implement exclusion zones In high sensitivity zones Implement post-construction monitoring Curtailment of turbines if need be Nest searches Control of staff and equipment to prevent disturbance 			
Proposed Construction Of The 140MW Roggeveld Wind Farm Within The Karoo Hoogland Local Municipality Of The Northern Cape Province And Within The Laingsburg Local Municipality Of The Western Cape Province	12/12/20/1988/1/AM1	Amendment	G7 Renewable Energies (Pty) Ltd	26 529	140 MW	 Maintain 1.3km buffer zones around Verreaux's Eagle nests Perform a pre-construction walk-through on the 132kV grid connection. 			
Proposed Photovoltaic (PV) Solar Energy Facility On A Site South Of Sutherland, Within The Karoo Hoogland Municipality Of The Namakwa District Municipality, Northern Cape Province	12/12/20/2235	BAR	Inca Komsberg Wind (Pty) Ltd	2859	10 MW	 Install visibility "flappers" on all new power lines that are associated with the solar energy facility in order to reduce bird collisions with the power lines. Implement existing Eskom standards for this mitigation. Install "safe" perch or nesting sites at or around the live electric sites on power line pylons so that large perching birds like eagles will not be electrocuted when 			

	APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION								
						perching or nesting on these parts of the pylons.			
Proposed establishment of the Suurplaat wind energy facility and associated infrastructure on a site near Sutherland, Western Cape and Northern Cape.	12/12/20/1583	S&EIR	Moyeng Energy (Pty) Ltd	28 600	120 MW	 All construction and maintenance activities should be carried out according to generally accepted environmental best practice. No permanent lights to be used on the turbines, only red strobe lights. Location of turbines in the high sensitivity zones to be guided by the results of the preconstruction programme. Powerline walk-down to be conducted to identify spans for marking with Bird Flight Diverters. 			
Proposed establishment of the Witberg Bay Wind Energy Facility, Laingsburg Local Municipality, Central Karoo District, Western cape	12/12/20/1966/A2	Amendment	Witberg Wind Power (Pty) Ltd	23 777	Unknown	Could not be sourced			
Proposed Wind Energy facility at Konstabel	12/12/20/1787	S&EIR	South Africa Mainstream Renewable Power Development	5 129	170 MW	Could not be sourced			
Proposed development of a renewable Energy facility at Perdekraal, Western Cape - Split 1	12/12/20/1783/2/AM1	Amendment	South Africa Mainstream Renewable Power Development	6 347	Unknown	Could not be sourced			
Proposed development of renewable energy facility at Komsberg East and West near Sutherland	14/12/16/3/3/1/1562 14/12/16/3/3/1/1561	S&EIR	Komsberg Wind Farms (Pty) Ltd	25 600	550 MW	 Implement exclusion zones in high sensitivity areas Implement operational phase monitoring Use bird-friendly powerline designs Mark powerlines with BFDs Implement construction phase monitoring of raptor nests 			
Maralla East & West Wind Facilities (grid connection)	14/12/16/3/3/2/962	S&EIR	Biotherm	9 157	250MW	 Measures to control noise and dust should be applied according to current best practice in the industry. Maximum use should be made of existing access roads and the construction of new roads should be kept to a minimum as far as practical. The recommendations of the ecological 			

BIRD IMPACT ASSESSMENT STUDY

	APPENDIX 2: LI	ST OF RENEWA	BLE ENERGY PROJECTS WITHIN A 70KM	RADIUS AROUN	ID KOMSBERG SUBSTAT	ION
						 and botanical specialist studies must be strictly implemented, especially as far as limitation of the construction footprint and rehabilitation of disturbed areas is concerned. Prior to construction commencing, an inspection should be performed by the avifaunal specialist to record any large raptor nests on the existing Droërivier-Muldersvlei 1 400kV line that could be impacted by the construction of the proposed powerline Should any nests be recorded, it would require management of the potential impacts on the breeding birds once construction commences, which would necessitate the involvement of the avifaunal specialist, and the Environmental Control Officer. An effective communication strategy should be implemented whereby the avifaunal specialist is provided with a construction schedule which will enable him/her to ascertain when and where breeding priority raptors could be impacted by the construction activities. This could then be addressed through the timing of construction activities during critical periods of the breeding cycle, once it has been established that a particular nest is active. A walk-through must be conducted by the avifaunal specialist after final pole positions have been determined, to demarcate sections of line that will need to be mitigated with Bird Flight Diverters.
Esizayo Wind Facility (grid connection)	14/12/16/3/3/2/967	S&EIR	Biotherm Energy	5 800	250MW	to the immediate footprint of the infrastructure.

	APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION						
						•	Access to the remainder of the site should be strictly controlled to prevent unnecessary disturbance of priority species. Measures to control noise and dust should be applied according to current best practice in the industry. Maximum use should be made of existing access roads and the construction of new roads should be kept to a minimum as far as practical. The recommendations of the ecological and botanical specialist studies must be strictly implemented, especially as far as limitation of the construction footprint and rehabilitation of disturbed areas is concerned. A walk-through must be conducted by the avifaunal specialist after final pole positions have been determined, to demarcate sections of line that will need to be mitigated with Bird Flight Diverters.
Mainstream Sutherland 2 WEF grid connection	Pending	BAR	Mainstream Renewable Power		132kV	•	Restricting the footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control dust, restricted access to the rest of the property, and rehabilitation of all areas disturbed. Training the Environmental Control Officer to identify Red Data nests during construction, and a pre-construction walk- through by the avifaunal specialist to identify any Red Data nests coupled with the timing of the construction if need be. Certification of the proposed powerline design as bird-friendly by the avifaunal specialist before construction commences,

APPENDIX 2: LIST OF RENEWABLE ENERGY PROJECTS WITHIN A 70KM RADIUS AROUND KOMSBERG SUBSTATION							
				•	and reactive mitigation in the proposed on-site substation site if electrocutions are recorded. Walk-through by the avifaunal specialist of the final alignment to identify sections that require mitigation, the fitting of Bird Flight Diverters on those pre-identified sections and quarterly line inspections by the avifaunal specialist to record collision- related mortality.		
Mainstream Sutherland WEF grid connection	BAR	Mainstream Renewable Power	132kV	•	Restricting the footprint to the absolute minimum, no off-road driving, maximum use of existing roads, measures to control dust, restricted access to the rest of the property, and rehabilitation of all areas disturbed. Training the Environmental Control Officer to identify Red Data nests during construction, and a pre-construction walk- through by the avifaunal specialist to identify any Red Data nests coupled with the timing of the construction if need be. Certification of the proposed powerline design as bird-friendly by the avifaunal specialist before construction commences, and reactive mitigation in the proposed on-site substation site if electrocutions are recorded. Walk-through by the avifaunal specialist of the final alignment to identify sections that require mitigation, the fitting of Bird Flight Diverters on those pre-identified sections and quarterly line inspections by the avifaunal specialist to record collision- related mortality.		

BIRD IMPACT ASSESSMENT STUDY



APPENDIX 3: ENVIRONMENTAL MANAGEMENT PROGRAMME

Management Plan for the Construction Phase (Including pre- and post-construction activities)

Impact	Mitigation/Management Objectives	Mitigation/Management Actions				Monitoring		
impact	and Outcomes	wittigetten/wandgement Actions		Methodology		Frequency		Responsibility
Displacement of Re	d Data species due to permanent habita	at transformation						
The clearing of vegetation in the proposed on-site substation yard, O&M Building, Laydown Area and the service road	Prevent unnecessary impacts on the surrounding environment by ensuring that contractors are aware of the requirements of the site-specific Construction Environmental Management Programme (CEMPr).	 A site-specific CEMPr must be implemented, which gives an appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction and degradation of habitat. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr should specifically include the following: 1. The minimum footprint areas for infrastructure should be used wherever possible, including road widths and lengths; 2. No off-road driving; 3. Maximum use of existing roads; 4. Measures to control dust; 5. Restricted access to the rest of the property; 6. Following construction, rehabilitation of all areas disturbed (e.g. temporary access tracks) must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordingly. 	1. 2. 3. 4.	Implementation of the CEMPr. Oversee activities to ensure that the CEMPr is implemented and enforced via site audits and inspections. Report and record any non- compliance. Ensure that the construction area and footprint is kept to a minimum. Carry out regular site inspections to verify the limits of the construction area to ensure unnecessary disturbance is avoided. Ensure that construction personnel are made aware of the impacts relating to off-road driving. Construction access roads must be demarcated clearly. Undertake site inspections to verify. Construction access roads must be	1. 2. 3. 4. 5. 6. 7. 8.	On a daily basis Weekly Weekly Weekly Once-off prior to the completion of construction. Monthly during the construction phase.	1. 2. 3. 4. 5. 6. 7. 8.	ECO ECO ECO ECO ECO, Project Developer (Mainstream), and Rehabilitation Specialist, ECO and Construction Manager or Contractor

Impact	Mitigation/Management Objectives		Monitoring			
inpact	and Outcomes	witigation/management Actions	Methodology	Frequency	Responsibility	
			 demarcated clearly. Undertake site inspections to verify. 5. Monitor the implementation of dust control mechanisms via site inspections and record and report non- compliance. 6. Ensure that the construction area is demarcated clearly and that construction personnel are made aware of these demarcations. Monitor via site inspections and report non-compliance. 7. Appointment of Rehabilitation Specialist to develop a Habitat Restoration Plan and ensure that it is approved by auditing the final and signed report acceptance. 8. Monitor rehabilitation via site audits and site inspections to ensure compliance. Record and report any non- compliance. 			
Displacement of Rec	d Data species due to disturbance					

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring
Impact	and Outcomes	wittigation/wanagement Actions	Methodology Frequency Responsibility
Construction of the substation, service road and powerline	Prevent unnecessary displacement of Red Data avifauna by ensuring that contractors are aware of the requirements of the CEMPr.	 A site-specific CEMPr must be implemented, which gives appropriate and detailed description of how construction activities must be conducted. All contractors are to adhere to the CEMPr and should apply good environmental practice during construction. The CEMPr must specifically include the following: No off-road driving; Maximum use of existing roads; Measures to control noise; Restricted access to the rest of the property; The appointed ECO must be trained by an avifaunal specialist to identify the potential priority species as well as the signs that indicate possible breeding by these species. The ECO must then, during audits/site visits, make a concerted effort to look out for such breeding activities of Red Data species, and such efforts may include the training of construction staff to identify Red Data species. If any of the Red Data species are confirmed to be breeding (e.g. if a nest site is found), construction activities within 500m of the breeding site must cease, and an avifaunal 	1.Implementation of the CEMPr. Oversee activities to ensure that the CEMPr is implemented and enforced via site audits and inspections. Report and record any non- compliance.1.Cn a daily basis 2.1.ECO 2.2.ECMPr.3.Weekly3.ECO3.Weekly4.Weekly5.ECO4.Weekly5.Weekly5.ECOand record via site audits and record any non- compliance.6.Once-off before construction personnel are made aware of the impacts relating to off-road driving. Construction access roads must be demarcated clearly. Undertake site inspections to verify.8.Once-off and ensure all new construction personnel are trained in this regard.9.Project Developer (Mainstream), Avifauna Specialist and ECO3.Construction access roads must be demarcated clearly. Undertake site inspections to verify.9.Throughout construction when breeding sites are found.10.Once-off before the start of construction activities4.Monitor the implementation of noise construction area is demarcated clearly and that construction personnel are made aware of these demarcated clearly and that construction personnel are made aware of these demarcated clearly and that construction personnel are made aware of these demarcations. Monitor10.None-off before the start of construction activities10.5.Ensure that the construction personnel are made aware of these demarcations. Monitor10.None-

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring			
inpact	and Outcomes	Mitigation/Management Actions		Methodology	Frequency	Responsibility
		 specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed. Prior to construction, an avifaunal specialist should conduct a site walk through, covering the final road and power line routes, to identify any nests/breeding/roosting activity of priority species, as well as any additional sensitive habitats. The results of which may inform the final construction schedule in close proximity to that specific area, including abbreviating construction time, scheduling activities around avian breeding and/or movement schedules, and lowering levels of associated noise. 	6. 7. 8. 9.	via site inspections and report non-compliance. Appoint an Avifauna Specialist prior to the construction phase to train and guide the ECO in identify potential priority species and signs for potential breeding. ECO to undertake site visits and audits to find breeding sites. ECO to provide training and information sessions to the construction personnel to identify Red Data species. Conduct regular audits of attendance registers for training. Ensure that construction activities are stopped within 500 m of any breeding sites of Red Data species. Ensure that an Avifaunal Specialist is contacted immediately for further assessment. Conduct audits to verify the placement of the buffer area and verify if the Avifaunal Specialist has been appointed. Appointment of		

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring					
inipact	and Outcomes	wittigation/wanagement Actions	Methodology	Frequency	Responsibility			
			Avifaunal Specialist to conduct a site walk through of the final road and power line routes. Record and report any non-compliance.					
Electrocution of Red	d Data avifauna on the proposed 132kV	line and in the on-site substation						
The transmission of electricity generated by the proposed Rietrug WEF	Prevent any electrocutions of Red Data avifauna on the 132kV powerline	The avifaunal specialist must certify that the pole structures to be used on the 132kV powerline are bird- friendly. The pole design must be presented to the avifaunal specialist for sign-off.	Appointment of Avifauna Specialist to sign off on the powerline design. ECO to ensure that this has been complied with by auditing reports, minutes of meetings or sign-off process.	Once-off before construction.	Avifaunal Specialist, Project Developer (Mainstream), ECO and Construction Manager or Contractor			
Mortality of Red Dat	a avifauna due to collisions with the ea	arthwire of the proposed powerline	1					
The transmission of electricity generated by the proposed Rietrug WEF	Mortality of Red Data avifauna due to collisions with the earthwire of the proposed powerline	 An avifaunal specialist must conduct a site walk through of final pylon positions prior to construction to determine if, and where, bird flight diverters (BFDs) are required. Install BFDs as per the instructions of the specialist following the site walk through, which may include the need for modified BFDs 	 Walk-through to be conducted once the final pole positions have been pegged. Ensure that the BFD design is suitable for installation on the proposed powerline design, and install the devices prior to the line being energized. 	 Once-off before construction commences. Once-off before the line is energized. 	 Avifaunal specialist and Project Developer (Mainstream) Construction Manager or Contractor 			

Impact	Mitigation/Management Objectives	Mitigation/Management Actions		Monitoring		
impact	and Outcomes		Methodology	Frequency	Responsibility	
		fitted with solar powered LED lights on certain spans.				

Management Plan for the Operational Phase

Impact	Mitigation/Management	Mitigation Management Actions	Monitoring			
impact	Objectives and Outcomes			Methodology	Frequency	Responsibility
Electrocution of Red Da	ata avifauna on the proposed 132kV	line and in the on-site substation				
The transmission of electricity generated by the proposed Rietrug WEF	Ensure effective reactive mitigation if need be in the proposed on-site substation yard if Red Data species are electrocuted.	The hardware within the proposed on-site substation yard is too complex to warrant any mitigation for electrocution at this stage. It is recommended that if on-going impacts are recorded once operational, site specific mitigation be applied reactively. If any electrocutions of Red Data avifauna are reported in the proposed on-site substation yard, the avifaunal specialist must be notified for an inspection of the problem and advice on how the problem can be resolved, if at all, through appropriate mitigation.	2.	Avifaunal specialist to be appointed to conduct on-site investigation. Environmental Manager to record impacts of electrocution of Red Data avifauna at the proposed on-site substation and ensure that reactive site specific mitigation is implemented if required. Record and report any non- compliance.	As and when required.	Avifaunal Specialist, Project Developer (Mainstream) and Environmental Manager
Mortality of Red Data a	vifauna due to collisions with the ear	rthwire of the proposed powerline				
The transmission of electricity generated from the proposed Rietrug WEF	Mortality of Red Data avifauna due to collisions with the earthwire of the proposed powerline.	The operational monitoring programme must include regular monitoring of the grid connection power line for collision mortalities.	1.	Avifaunal specialist to be appointed and must conduct a quarterly walk-through of the grid connection. Environmental Manager to verify appointment of specialist and monitor the frequency of monitoring by auditing signed reports and minutes of meetings.	Quarterly	Avifaunal specialist and Facility Manager

Management Plan for the Decommissioning Phase

Imnact	Mitigation/Management	Mitigation/Management Actions	Monitoring			
inipact	Objectives and Outcomes	witigation/wanagement Actions	Methodology	Frequency	Responsibility	
Displacement of Red D	ata species due to disturbance					
Removal of the infrastructure	Prevent unnecessary displacement of Red Data avifauna by ensuring that contractors are aware of the requirements of the site-specific Decommissioning Environmental Management Programme (DEMPr).	 A site-specific DEMPr must be implemented, which gives appropriate and detailed description of how decommissioning activities must be conducted to reduce unnecessary destruction of habitat. All contractors are to adhere to the DEMPr and should apply good environmental practice during decommissioning. Following decommissioning, rehabilitation of all areas disturbed (e.g. temporary access tracks) must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist and implemented accordingly. 	 Implementation of DEMPr and oversee activities to ensure that the DEMPr is implemented and enforced, via site audits and inspections. Record and report any non- compliance. Appointment of Rehabilitation Specialist to develop a Habitat Restoration Plan and ensure that it is approved by auditing the final and signed report acceptance. Monitor rehabilitation via site audits and site inspections to ensure compliance. Record and report any non- compliance. 	 On a daily basis Once-off prior to the completion of decommissioning. Monthly during the decommissioning phase. 	 ECO Project Developer (Mainstream) and Rehabilitation Specialist and ECO ECO, Construction Manager or Contractor 	

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT





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Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Appendix E.1 Proof of Placement of Newspaper Advertisements and Site Notice Board

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

<u>Project Initiation Phase (Release of BID for 30-day comment period): Newspaper Advertisement – The Cape Times</u> (English)

COMBINED NOTICE OF BASIC ASSESSMENT AND ENVIRONMENTAL AUTHORISATION AMENDMENT PUBLIC PARTICIPATION PROCESS FOR THE PROPOSED DEVELOPMENT OF ELECTRICAL GRID INFRASTRUCTURE TO SUPPORT THE PROPOSED SUTHERLAND, SUTHERLAND 2 AND RIETRUG WIND ENERGY FACILITIES, SUTHERLAND, NORTHERN AND WESTERN CAPE PROVINCES

THE PROPOSED AMENDMENT TO THE ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED SUTHERLAND, SUTHERLAND 2 AND RIETRUG WIND ENERGY FACILITIES, SUTHERLAND, NORTHERN AND WESTERN CAPE PROVINCES

South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter referred to as Mainstream) received three Amended Environmental Authorisations (EAs), dated 10 November 2016 (DEA Reference Numbers: 12/12/20/1782/1; 12/12/20/1782/2; and 12/12/20/1782/3), from the National Department of Environmental Affairs (DEA) to construct and operate the Sutherland Wind Energy Facility (WEF), Sutherland 2 WEF, and Rietrug WEF, each with a generation capacity of 140 MW. EA Amendment Applications will be submitted to the DEA to amend the turbine and hub specifications of each of the separately authorised WEFs (dated 10 November 2016). Mainstream is also proposing to construct electrical infrastructure (including three on-site substations, Operational and Maintenance Buildings, laydown areas, service roads, 132 kV distribution lines, and separately authorised WEF projects.

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 NEMA Environmental Impact Assessment (EIA) Regulations promulgated in Government Gazette 38282 and Government Notice (GN) R982, R983, R984 and R985 on 8 December 2014, the proposed projects require three substantive EA Amendment Application Processes (to amend the turbine specifications) and three Basic Assessment (BA) Processes for the proposed electrical infrastructure. The CSIR has been appointed by Mainstream to undertake the requisite substantive EA Amendment Application and BA Projects, the details of which are indicated in the table below.

Projects	Overall Locality
Substantive EA Amendment Processes (in terms of Regulations 31 to 33 of the 2014 NEMA EIA Regulations): • Sutherland WEF – Amendment 2 • Sutherland 2 WEF – Amendment 2 • Rietrug WEF – Amendment 2	 Rietrug and Sutherland 2 WEFs are located in the Northern Cape, approximately 23 km south of Sutherland and 50 km north of Laingsburg, under the jurisdiction of the Namakwa District Municipality and the Karoo Hoogland Local Municipality. The proposed Sutherland WEF is located in the Northern Cape, within the aforementioned district and local municipalities; however a small portion of the WEF falls within the Western Cape, under the jurisdiction of the Central Karoo District Municipality and the Laingsburg Local Municipality.
 BA Processes: Proposed Electrical Grid Infrastructure Sutherland WEF – Electrical Grid Infrastructure Sutherland 2 WEF – Electrical Grid Infrastructure Rietrug WEF – Electrical Grid 	 All three Electrical Grid Infrastructure projects are located in the Northern Cape, approximately 23 km south of Sutherland and 50 km north of Laingsburg, under the jurisdiction of the Karoo Hoogland Local Municipality and the Laingsburg Local Municipality, within the Northern and Western Cape Provinces, respectively.

The BA projects potentially trigger the following activities:

- GN R983 Listing Notice 1: Activity 9; Activity 11 (i); Activity 12 (x), (xii); Activity 19 (i); Activity 27; and Activity 28 (ii); and
- GN R985 Listing Notice 3: Activity 4 [((a), (ii) and (ee) and ((f), (i) and (aa))]; Activity 12 [((a) and (ii)) and ((d) and (ii))]; and Activity 14 [(x), (xii), [(a), (ii) and (ff)] and [(f), (i) and (ff)]].

To ensure that you are included on the project register, as well as to raise any issues and concerns for inclusion in the EA Amendment and BA Reports, you are kindly requested to register your interest in the projects and submit any comments you may have to Shawn Johnston at Sustainable Futures ZA (at the details indicated below via post, email, and fax) within 30 days of this notification (i.e. by no later than 1 February 2017). Kindly note that available project information can be accessed at the following website: https://www.csir.co.za/environmental-impact-assessment. For more information and/or to register as an Interested and Affected Party (I&AP), please contact: Shawn Johnston at Sustainable Futures ZA on Tel: 083 325 9965, Fax: 086 510 2537, P.O. Box 749, Rondebosch, 7701, or E-mail: swjohnston@mweb.co.za.

<u>Project Initiation Phase (Release of BID for 30-day comment period): Newspaper Advertisement – Die Burger and Noordwester (Afrikaans)</u>

GEKOMBINEERDE KENNISGEWING VAN DIE VOORGESTELDE ONTWIKKELING VAN ONDERSTEUNINGSINFRASTRUKTUUR VIR DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG WINDKRAGAANLEGTE, SUTHERLAND, WESKAAP EN NOORD-KAAP PROVINSIES EN

OMGEWINGSIMPAKSTUDIE VAN DIE VOORGESTELDE WYSIGING AAN DIE OMGEWINGSGOEDKEURING VIR DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG, SUTHERLAND, WESKAAP EN NOORD-KAAP PROVINSIES

South Africa Mainstream Renewable Power Developments (Pty) Ltd ("Mainstream") het omgewingsmagtiging ontvang by die Nasionale Departement van Omgewingsake (DOS) op 22 Februarie 2012 (DOS verwysingsnommer: 12/12/20/1782, NEAS verwysingsnommer: DEAT/EIA/12225/2011) om 'n hernubare energie aanleg te bou, bestaande uit 'n sonkragaanleg en windkragaanleg. 'n Nie-materiële wysiging aan die omgewingsgoedkeuring was onderneem en is op 06 Oktober 2015 (DOS verwysingsnommer: 12/12/20/1782/AM1) toegestaan. 'n Materiële wysigingsproses aan die omgewingsgoedkeuring was onderneem vir die opdeel van die hernubare energie aanleg in drie aparte projekte, naamlik Sutherland, Sutherland 2 en Rietrug (DOS verwysingsnommers: 12/12/20/1782/1; 12/12/20/1782/2; and 12/12/20/1782/3) en is op 10 November 2016 toegestaan. Die goedkeuring vervang die oorspronklike goedkeuring (gedateer 22 Februarie 2012) en die gewysigde goedkeuring (gedateer 06 Oktober 2015). Die drie windkragaanlegte kom voor in die Karoo Hoogland Munisipaliteit en die Namakwa Distrik Munisipaliteit, 23 km Suid van Sutherland. 'n Deel van die Sutherland windkragaanleg kom ook voor in die Laingsburg Munisipaliteit en Sentrale Karoo Distrik Munisipaliteit, 50 km Noord van Laingsburg, Wes-Kaap Provinsie.

Ingevolge die Nasionale Omgewingsbestuurswet (Wet 107 van 1998, soos gewysig) (NEMA) en die 2014 NEMA Omgewingsimpakstudie Regulasies gepubliseer op 08 Desember 2014 in die staatskennisgewing 38282 en Regulasie 982, 983, 984 en 985, moet die wysigingsproses voldoen aan die vereistes van Artikel 32 van die Regulasies en die Basiese Evaluering aan Artikel 19. Die volgende gelyste aktiwiteite is waarskynlik van toepassing op die Basiese Evalueringsprosesse: GN R 983: Aktiwiteit 9; 11(i); 12(x), en (xii); 19(i); 27; en 28(ii) en GN R 985: Aktiwiteit 4 [(a), (ii) en (ee) en (f) en (i) en (aa)]; Aktiwiteit 12 ((a) en (ii)) en ((d) en (ii))]; en Aktiwiteit 14 [(x), (xii), [(a), (ii) en (ff)] en [(f), (i) en (ff)]]. Die WNNR is aangestel deur Mainstream om die proses te bestuur. Die huidige ingligting besikbaar vir die projek word in the table vertoon:

Projekte	Ligging
MateriëlewysigingsaandieOmgewingsgoedkeuring:••Sutherland WEF – Amendment 2•Sutherland 2 WEF – Amendment 2•Rietrug WEF – Amendment 2	 Die Rietrug and Sutherland 2 windkragaanlegte word voorgestel in die Karoo Hoogland Munisipaliteit en die Namakwa Distrik Munisipaliteit, 23 km Suid van Sutherland en 50 km Noord van Laingsburg. Die Sutherland windkragaanleg word ook in die Noord-Kaap voorgestel, met 'n klein gedeelte wat in die Laingsburg Munisipaliteit en Sentrale Karoo Distrik Munisipaliteit, 50 km Noord van Laingsburg, Wes-Kaap Provinsie voorkom.
 BA Prosesse: Voorgestelde Ondersteuningsinfrastruktuur Sutherland WEF – Electrical Grid Infrastructure Sutherland 2 WEF – Electrical Grid Infrastructure Rietrug WEF – Electrical Grid Infrastructure 	 Die ondersteuningsinfrastruktuur word voorgestel in die Karoo Hoogland Munisipaliteit en die Namakwa Distrik Munisipaliteit, 23 km Suid van Sutherland en 50 km Noord van Laingsburg.

'n Geïntegreerde openbare deelname proses word vir die prosesse voorgestel, aangesien die projekte in dieselfde area gaan plaasvind, dieselfde aktiwiteit omskryf en ook op dieselfde windkragaanleg van toepassing is. Aparte verslae sal wel vir elk van die projekte saamgestel en vrygestel word.

G&BP's word hiermee in kennis gestel van die registrasie van belanghebende partye die projekte. Die agtergrondsinligting dokument is vir 30-dae beskikbaar vir kommentaar (vanaf 09 Desember 2016 to 01 Februarie 2017, uitsluitend openbare vakansiedae). Harde kopieë van die agtergrondsinligting dokument is beskikbaar by die Laingsburg Openbare Biblioteek, Sutherland Openbare Biblioteek en die Laingsburg en Sutherland Munisipaliteite. Die projek se webtuiste is as volg: https://www.csir.co.za/environmental-impact-assessment

Vir meer inligting, kontak gerus vir: Shawn Johnston by Sustainable FuturesZA op Tel: 0833259965, Faks: 0865102537 of E-pos: swjohnston@mweb.co.za.

Newspaper Advertisement – English (For the Release of the Background Information Document) – The Cape Times – 9 December 2016



(PTY) LTD internets to make epolicitation to CIPC for the re-instatement of the axid Company with registration number 2000/000237/07. Prease refer any dopro- tonis to the re-instatement to CIPC 'PO' Lioo 428.	julgment may be granted against you without further reference to you. Detect Athone on this the Oth dayof March 2015. LEGAL AID SOUTH ATRICA, per W LITTLE, Athone batter Contra An-	ach let co, PAU com Net 2421, Not NY VOY 1922 C Looking for ajob, Visit car website www.jolijob.co.za	Todaks may only be submitted in hard copy on the bit documentation for his been inset. The completed original loader documentation match be fooded in a stated even- lope - clearly stating the leader market (CTICC 020/2017. REFRIGERATION PLANT INSTALLATION FOR THE FOOD AND BEVERAGE COLD ROOMS, COLD KITCHEN AND KITCHEN FREEZER - CTICC EAST WING DEVELOPMENT) and the norm of the	I formand gambing constitutes a legitimate basiness operation, moral objections for or against gambing will mable considered by the Board An objection that merely states that one is operated to any barboar much substantiation will not be viewed with much theorally our ano haraby an coursiged to read the Act and barm more about the Board's powers and the matters persuant to which	geneting constitute a legitimate bioiness operation, moral objections for or- aginer gmindly will not be considered by the Band. An objection that merely states that one is opposed to gambing, without much substantiation, will not be viewed with much shour. You are hereby excanged to read the Act and learn more about the Boardh powers and the matters pursuant to which objections
Pretara, 0001 within 21 days of the publication of this botics. (10519314)	picant's Atomays, 2nd Roor, Meloth Cantra, Old Opfortein Road, Athlona, Tel: 021 697 5252. Pasc 021 697 5316.	Looking for ajob, Visit our website waw.joljpbs.co.za	Indexe. The sealed after must be depended into the Tender Bax 1 stated at the reception area on the ground foor of the Cape Town International Convention Centre. The closing time for receive of fundas is 1 2000 on Wednesday. 18 January 2017 .	objections may be lodged. These are outlined in Sections 28, 30, 31 and 35 of the Act. Members of the public can obsain a copy of the objections guidelines, which is an explanatory guide through the legal framework governing the lodgement of objections, public hearings and the Board's adjudication	May be to deal. These are outsided in bactions 25, 30, 31 and 35 of the Act. Members of the public can obtain a copy of the objection guiddlines, which are an explanatory guide through the legal framework governing the lodgen out of objections and the Board's adjudication procedures. The objection guidelines are
Sell it quick sticks, we have great advertising rates.	TO: THE REDISTRAR REGIONAL COURT, MITCHELL'S PLAIN. (10519209)	sell it quick sticks, we have great	Telegraphic, telephonic, teles, facutable, electronic and and late tenders will not be accepted Requirements for tealing, addressing, delivery, opening and assessment of tenders are stated both models and the TECC means	procedures. The objections guidelines are accessible from the Board's website at www.wogrbco.as and copies can also be made available on request.	acclassible from the boards website at www.wogroco.st and copies can also be made awaitatie on reguest. The Board will consider all commersion and objections lodged on or before the closing date during the adjudication of the application.
Call today and one of our friendly consultants will assist you with your advertising requirements.	NOTICE Planation take note that the members of Toxice Avail 274 CC, Registration Number 2001/032578/22, instands making application to the Commissioner of CIPC for	Call today and one of our friendly consultants will assist you with your advertising	Is needentine or to reach any proposal. The CFCC reserves the right to accept one toxic in full or a partitional. The CFCC deas not like in the line accepting the lowest bid or to award a contract to the bidder who access the highest number of parts. Cape Town International Convention Centre	Intervised parties are referred to Social II of the ACL which permits parties to lodge comment on the application. ¹ The times, address and takephonel number of the person submitting the objection or othering the comment must also be provided. Comments or objections must reach the Board not hair than 1640 on Friday, 30 December 2016. Objections or comments must be forwarded to the Chief Executive	In the case of written objections to an application, the grounds on which such objections are founded must be intributed. Where comment in respect of an application is furnished, full particulars and facts to substantiate such comment instate be prodied. The many, address and telephone number of the perion substituting the objection or offwring the comment must also be prodied. Comments or objection must rush the Bard by no later than
Telephone (021) 488 4888 or email cape.classifieds@ inl.co.za for 24 hour service 7 days a week	ib neinaticitienent. Places rota further that any objection to the application must be lodged with the Commissioner of CIPC within 21 (fuwinty one) days of the date of publication hereof. (10519572)	Telephone (021) 488 4888 oremail cape.classified.s0 inl.co.za for 24 hour service	For all your Legal Advertisements Contact us on	Office; Western Cape Gambling and Racing Board, P.O. Box 8 175, Roggebaai 8012 or handed to the Chief Executive Officer, Western Cape Gambling and Racing Board, Stafare House, 68 Orange Screet, Gardens, Cape Town or faxed to 021 422 2603 or e-mailed to objections.licersing@wcgrb.co.za	Objections or comments must be forwarded to the Chief Executive Officer, Western Cape. Gambling and Racing Board, P.O. Box 8175, Rogge Bay 6012 or handed to the Chief Executive Officer, Western Cape Gambling and Racing Board, Sadare House, 60 Compos Erenet, Gardens, Cape Town or faxed to the Chief Executive Officer on 021 422 2602, or emailed to objections. licensing@wcgh.cn.az
Visit our website www.wegotads.co.za	Looking for a job, Visit our website: www.isijebszoza	Visit our website: www.wegotads.co.za	- Tel: 021 488 4898	OFFICIAL NOTICE • OFFICIAL NOTICE • OFFICIAL NOTICE	OFFICIAL NOTICE + OFFICIAL NOTICE + OFFICIAL NOTICE

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF - Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Newspaper Advertisement – Afrikaans (For the Release of the Background Information Document) – Die Noordwester – 9 December 2016



soek gemeld word

Rietrua WEF - Electrical Grid Infrastructure

Grid Infrastructure

'n Geintegreerde openbare deelname proses word wr die prosesse voorgestel, aangesien die projekte in dieselfde area gaan plaasvind, dieselfde aktiwiteit amskryf en ook op dieselfde windkraggaanleg van toepassing is. Aparte verslae sat wel vir eik van die projekte sacmgestel en vrygestel word.

Boosting and an arysen motion of a second and a second a se ite. Die projek se webtuiste is as volg: https://www.csir.co.za/environmentalimpact-assessment

vir: Shawn Johnston by Sustainable FuturesZA op Tel: Vir meer inligting, kontok gerus vir: Shawn Johnston by Sustainable 0833259965, Faks: 0865102537 of E-pos: swjohnston@mweb.co.zo.



ONS VOORSIEN DIE NOORDWESTE WILLISTON, CARNARVON, LOXTON, VICTORIA-WES, PRIESKA, EN VANWYKSVLEI

SKAKEL JANETTA BY TEL. 027 3411026 FAKS 027 3411686 s-pos: noordwestersheniem.co.za

- * Geldige SARS Sertifikaat van u besigheid moet aan geheg wees
- Munisipale Diensterekening moet by u kwotasies ingesluit wees
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- * MBD4 vorms moet voltooi word.

Pryse sal oorweeg word volgens die voorgeskrewe Voorsieningskanaal Bestuurs Regulasies, en die 90/10 pun-testelsel soos voorgeskryf deur die PPPFA, 5 van 2000.

Riaan van Wyk

Waarnemende Munisipale Bestuurder

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Newspaper Advertisement – Afrikaans (For the Release of the Background Information Document) – Die Burger – 9 December 2016



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Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Copy of the Site Notice Boards: English and Afrikaans

JOINT NOTICE OF BASIC ASSESSMENT AND SUBSTANTIVE ENVIRONMENTAL AUTHORISATION AMENDMENT PROCESSES

THE PROPOSED CONSTRUCTION OF ELECTRICAL GRID INFRASTRUCTURE, AND AMENDMENT OF THE TURBINE AND HUB SPECIFICATIONS OF THREE WIND ENERGY FACILITIES NEAR SUTHERLAND, NORTHERN AND WESTERN CAPE PROVINCES

South Africa Mainstream Renewable Power Developments (Pby) Ltd (hereinafter referred to as Mainstream) received three Amended Environmental Authorisations (EAs), dated 10 November 2016 (DEA Reference Numbers: 12/12/20/1782/1; 12/12/20/1782/2; and 12/12/20/1782/3; from the National Department of Environmential Afriaris (DEA) to construct and operate the Sutherland Wind Energy Facility (WEF), Sutherland 2 WEF, and Rietrug WEF; each with a generation capacity of 140 MW, Notes is hereby given in terms of Regulation 41 of the Environmental Impact Assessment (EA), Regulationes of the Environmental Management Act (Act 107 of 1984), and Rietrug WEF; Sutherland 2 WEF, and Rietrug WEF; each with a generation capacity of 140 MW, Notes is hereby given in terms of Regulation 41 of the Environmental Impact Assessment (EA), Regulationes of the National Environmental Management Act (Act 107 of 1984), that Mainstream is proposing to amend the turbline and hub specifications of each of the separately authorised WEF (as part of a substations, Operational and Maintenance Buildings, Isydom areas, service roads, 132 kV distribution lines, and connection to a proposed collector hub or the proposed Escon Nuverust substation) to support the separately authorised Suberland VIEF; and Rietrug WEF. The Rietrug and charter and and a part of a substational proporticity existing and bio specification and Substational VIEF and Rietrug and Substational VIEF and Rietrug and Substational VIEF and Rietrug and Substational VIEF, and Rietrug and Charter and and a part of a substational varies and and portional existing and substational varies and and a proposed collector hub or the proposed and VIEF is Netherland and Substational VIEF, and Rietrug VIEF. Substations Operational authoris and VIEF, Substational VIEF and Rietrug VIEF. The Rietrug VIEF is a substation in compositive substation in complexity authorised VIEF is a substational substational varies and and substational varies and varies and varies and varies and varies and varies and varies a

The proposed amendment to the turbine specifications constitutes a substantive EA Amendment Process (in terms of Regulations 31 to 33 of the 2014 NEMA EIA Regulations). Basic Assessment (BA) Processes are required for the construction of the proposed supporting electrical infrastructure. The CSIR has been appointed by Mainstream to undertake the requisite substantive EA Amendment Application and BA Projects, which are referred to as:

Substantive EA Amendment Processes BA Processes: Proposed Electrical Grid Infrastructure		
 Sutherland WEF – Amendment 2 	 Sutherland WEF – Electrical Grid Infrastructure 	
 Sutherland 2 WEF – Amendment 2 	 Sutherland 2 WEF – Electrical Grid Infrastructure 	
 Rietrug WEF – Amendment 2 	 Rietrug WEF – Electrical Grid Infrastructure 	

The need for a BA is triggered by the following potential listed activities listed in GN R983 and GN R985:

Process	Government Notice	Listed Activity Number
	GN R983 - 8 December 2014	Activity 9; Activity 11 (i); Activity 12 (x), (xii); Activity 18 (i); Activity 27; and Activity 28 (ii)
BA Processes	GN R985 - 8 December 2014	Activity 4 [((a), (ii) and (ee) and ((f), (i) and (aa))]; Activity 12 [((a) and (ii)) and ((d) and (ii))]; and Activity 14 [(x) (xi) ((a) (ii) and (f) and (f) (i) and (ff)]

Since the three BA and three substantive EA Amendment projects are located within the same geographical area and constitute the same type of activity (i.e. generation of electricity via wind resources and transmission to the National Grid), an integrated Public Participation Process will be undertaken for the propoed projects. However, separate Applications for EA for each BA project and separate Applications for EA Amendment for each WEF Amendment 2 project will be fodged with the Competent Authority (i.e. the DEA). As such separate reports (i.e. EA Amendment and BA Reports) will be compiled for each project.

To ensure that you are included on the project register as an interested and Affected Party (I&AP), as well as to raise any issues and concerns for inclusion in the EA Amendment and BA Reports, you are kindly requested to register your interest in the projects and submit any comments you may have to the Public Participation Facilitator, Shawn Johnston at Sustainable Futures 2A (at the details indicated below via post, email, and fax). Available project information can be accessed at the following website: https://www.csic.co.zie/environmental-impact-assessment. A Background information Document is currently available for a 30-day commenting period (9 December 2016 – 1 February 2017).





Figure 1: Locality Map depicting the location of the Proposed Projects

GEKOMBINEERDE KENNISGEWING VAN DIE VOORGESTELDE ONTWIKKELING VAN ONDERSTEUNINGSINFRASTRUKTUUR VIR DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG WINDKRAGAANLEGTE, EN OMGEWINGSIMPAKSTUDIE VAN DIE VOORGESTELDE WYSIGING AAN DIE OMGEWINGSGOEDKEURING DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG, SUTHERLAND, WESKAAP EN NOORD-KAAP PROVINSIES

South Africa Mainstream Renewable Power Developments (Pty) Ltd ("Mainstream") het omgewingsmagtiging ontvang by die Nasionale Departement van Omgewingsake (DOS) op 22 Februarie 2012 (DOS verwysingsnommer; 12/12/20/1782, INEAS verwysingsnommer; DEA/TEJA/1225/2011) om 'n hernubare energie aanleg te bou, bestaande uit 'n sonkragaanleg en windkragaanleg, 'n Nie-materiële wysiging aan die omgewingsgoedkeuring was onderemen nie too pl6 Oktober 2015 (DOS verwysingsnommer; 12/12/20/1782/3); 12/12/20/1782/3); en la op pl6 Oktober 2015 (DOS verwysingsnommer); DEA/TEJA/12/2017/2017); 12/12/20/1782/3); en la op pl6 Oktober 2015 (DOS verwysingsnommer); DEA/TEJA/12/2017/2017); 12/12/2017/2022, and 12/12/2017/82/3) en la op 10 November 2016 toegestaan. Die goedkeuring was dre aparte projekte, naamitk Sutherland, Deswysingsnommers, 12/12/2017/2017, 12/12/2017/82/3) en la op 10 November 2016 toegestaan. Die goedkeuring vas Oran Sutherlag, 'n Desward, Bestaande Sutherlag, IND, Sutherlag, IND,

Ingevolge die Nasionale Omgewingsbestuurswet (Wet 107 van 1998, soos gewysig) (NEMA) en die 2014 NEMA Omgewingsimpakstudie Regulasies gepubliseer op 08 Desember 2014 in die staatskennisgewing 38282 en Regulasie 82, 983, 984 en 965, most die wysigingsprozes voldeen aan die vereistes van Artikel 32 van die Regulasies en die Basiese Evaluering aan Artikel 19. Die WINIR is aangestel deur Mainstream om die proses te bestuur. Die huidige ingligting bestkaar vir die projek word in the table hieronder vertoon:

1.	Projekte			
Materiële wysigings aan die Omgewingsgoedkeuring:		BA Prosesse: Voorgestelde Ondersteuningsinfrastruktuur		
•	Sutherland WEF – Amendment 2	•	Sutherland WEF - Electrical Grid Infrastructure	
٠	Sutherland 2 WEF - Amendment 2		Sutherland 2 WEF - Electrical Grid Infrastructure	
٠	Rietrug WEF – Amendment 2	٠	Rietrug WEF – Electrical Grid Infrastructure	

In Basiese evalueringsproses word benodig omdat die volgende aktiwitelte ingesluit in GN R983 and GN R985 van belang is op die voorgestelde projekte:

Process	Staatskennisgewings	Gelyste aktiwiteit
	GN R983 - 8 Desember 2014	Aktiwiteit 9; 11(i); 12 (x), en (xii); 19(i); 27; en 28(ii)
BA Prosesse	GN R985 - 8 Desember 2014	Aktiwiteit 4 [(a), (ii) en (ee) en (f) en (i) en (aa)]; Aktiwiteit 12 [((a) en (ii)) en ((d) en (ii))]; en Aktiwiteit 14 [(x), (xii), [(a), (ii) en (ff)] en [(f), (i) en (ff)]

In Geïntegreerde openbare deelname proses word vir die prosesse voorgestel, aangesien die projekte in dieselfde area gaan plaasvind, dieselfde aktiwiteit omskryf en ook op dieselfde windkragaanlegte van toepassing is. Aparte verble sal wid vir efk van die projekte saangeste ien vrygestel word.

Verside Samon na en na en en en proper consigner. G&BP's word hiermee in kennis gestel van die registrasie van belanghebbende partye die projekte. Die agtergrondsinligting dokument is vir 30-dae beskikbaar vir kommentaar (vanaf 09 Desember 2016 to 01 Februarie 2017. uitsluiten doenhere vakaniedae). Harde kopiele van die agtergrondsinligting dokument is beskikbaar by die Laingsburg Openbare Biblioteek, Sutherland Openbare Biblioteek en die Laingsburg en Sutherland Munisipatiete. Die projek ex webkuiste is as volg: https://www.csic.co.zatervironmental-impact-assessment. U word wiendelike versoek om die publiekedeelname fasiliteerder, Shawn Johnston by Sustainable Futures ZA vir die projekte te registreer.





Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Proof of Placement of Site Notice Boards: 7 and 8 December 2016

Site Notice Board 2a (English and Afrikaans) placed at the boundary of the Sutherland 2 WEF Site A, Sutherland, Northern Cape

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Site Notice Board 2b (English and Afrikaans) placed at the boundary of the Sutherland 2 WEF Site B, Sutherland, Northern Cape



Site Notice Board 2c (English and Afrikaans) placed at the boundary of the Sutherland 2 WEF Site C, Sutherland, Northern Cape

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Site Notice Board 6 (English and Afrikaans) placed at the Sutherland Public Library, Sutherland, Northern Cape

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Site Notice Board 8 (English and Afrikaans) placed at the boundary of the Rietrug WEF Site (Farm Entrance), Sutherland, Northern Cape

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT



Site Notice Board 9 (English and Afrikaans) placed at the boundary of the Sutherland WEF Site (Farm Entrance), Sutherland, Northern Cape

Appendix E.2 Correspondence Sent to I&APs, Organs of State and Stakeholders

Copies of Correspondence Sent to I&APs, Stakeholders and Organs of State Prior to the Release of the Basic Assessment Report for I&AP Review (i.e. during the Project Initiation Phase)

Note from the CSIR: During the Project Initiation Phase, an integrated PPP was undertaken for the proposed BA Projects and the Amendment 2 Projects.

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Letter 1 dated 9 December 2016: English: Notification of the BA (and Amendment 2) Processes



9 December 2016

COMBINED NOTICE OF BASIC ASSESSMENT AND ENVIRONMENTAL AUTHORISATION AMENDMENT PUBLIC PARTICIPATION PROCESS

PROPOSED DEVELOPMENT OF SUPPORTING ELECTRICAL GRID INFRASTRUCTURE TO THE SUTHERLAND, SUTHERLAND 2 AND RIETRUG WIND ENERGY FACILITIES, SUTHERLAND, NORTHERN AND WESTERN CAPE PROVINCES

AND

ENVIRONMENTAL IMPACT ASSESSMENT OF THE PROPOSED AMENDMENT TO THE ENVIRONMENTAL AUTHORISATION FOR THE SUTHERLAND, SUTHERLAND 2 AND RIETRUG WIND ENERGY FACILITIES, SUTHERLAND, NORTHERN AND WESTERN CAPE PROVINCES

Dear Stakeholder

South Africa Mainstream Renewable Power Developments (PTY) Ltd ("Mainstream") received Environmental Authorisation (EA) from the National Department of Environmental Affairs (DEA) on 22 February 2012 (DEA Reference Number: 12/12/20/1782) for the proposed construction of the Sutherland Renewable Energy Facility, consisting of a Solar Energy Facility and a Wind Energy Facility (WEF). An amended EA was issued on 06 October 2015 (DEA Reference Number: 12/12/20/1782/AM1), following a non-substantive process. Mainstream undertook a second amendment process to split the original EA into three separate WEF projects entitled the Sutherland, Sutherland 2, and Rietrug WEFs. On 10 November 2016, the National DEA accordingly granted three separate EAs for the WEFs (DEA Reference Numbers: 12/12/20/1782/1; 12/12/20/1782/2; and 12/12/20/1782/3). These EAs replace the original EA (dated 22 February 2012) and the amended EA (dated 6 October 2015). The Sutherland, Sutherland 2 and Rietrug WEFs are located within the Karoo Hoogland Local Municipality and the Namakwa District Municipality, 23 km south of Sutherland, Northern Cape Province. A portion of the Sutherland WEF occurs in the Laingsburg Local Municipality and the Central Karoo District Municipality.

This notice serves as a notification to inform potential Interested and Affected Parties (I&APs) of the following processes proposed by Mainstream:

- Substantive EA Amendment Processes to increase the turbine hub height and rotor diameter of the Sutherland, Sutherland 2 and Rietrug WEFs.
- Basic Assessment (BA) Processes for the proposed supporting electrical grid infrastructure, including (but not limited to) an on-site substation and 132 kV distribution line, and connection to a proposed collector hub or the proposed Eskom Nuwerust substation in order to connect the approved Sutherland,

Sutherland 2 and Rietrug WEFs to the national grid. The proposed collector hub and Eskom Nuwerust Substation have been assessed as part of the separate Moyeng Energy (PTY) Ltd Suurplaat WEF Environmental Impact Assessment (EIA) (DEA Reference Number: 12/12/20/1583).

In terms of the National Environmental Management Act (Act 107 of 1986, as amended) (NEMA) and the 2014 NEMA EIA Regulations promulgated in Government Gazette 38282 and Government Notice (GN) R982, R983, R984 and R985 on 8 December 2014, the Amendment Processes must adhere to the provisions included within Section 32 of the EIA Regulations which outlines the process and consideration of an application for amendment Where a change in scope occurs and the BA Processes must be undertaken in accordance with Section 19 of the Regulations. The proposed BA Process potentially triggers the following activities, GN R 983: Activity 9; 11(i); 12(x), and (xii); 19(i); 27; and 28(ii) and GN R 985: Activity 4 [((a), (ii) and (ee) and (ff) and ((b), (i) and (ff)].

An integrated Public Participation Process is being undertaken for the processes as they are located within the same geographical area, constitute the same type of activity and is applicable to the same WEFs. However, separate reports (i.e. BA and Amendment Reports) will be compiled for each process.

I&APs are hereby notified of the release of the background information document for the proposed projects for a 30-day review period, which will extend from 9 December 2016 to 1 February 2017 (excluding public holidays in terms of Regulation 3(2) of the 2014 EIA Regulations).

Hard copies of the background information document are available for public viewing at the Laingsburg Library, Sutherland Library, Karoo Hoogland and Laingsburg Local Municipalities. The background information document can also be downloaded from the following website: https://www.csir.co.za/environmental-impact-assessment

You are kindly requested to submit any comments you may have on the background information document to Shawn Johnston at Sustainable Futures ZA within 30 days of this notification (i.e. by no later than 1 February 2017). For more information, please contact: Shawn Johnston at Sustainable FuturesZA on Tel: 0833259965, Fax: 0865102537 or E-mail: swjohnton@mweb.co.za.

Sincerely, Shawn Johnston Process Facilitator Sustainable Futures ZA

Basic Assessment for the Proposed Construction of Electrical Grid Infrastructure to support the Rietrug Wind Energy Facility (WEF), Northern and Western Cape Provinces (Rietrug WEF – Electrical Grid Infrastructure): BASIC ASSESSMENT REPORT

Letter 2 dated 9 December 2016: Afrikaans: Notification of the BA (and Amendment 2) Processes



P.O. Box 749 Rondebosch 7701 Tel: 0833259965 Fax: 0865102537 E-Mail: swjohnston@mweb.co.za

09 DESEMBER 2016

GEKOMBINEERDE KENNISGEWING VAN DIE VOORGESTELDE ONTWIKKELING VAN ONDERSTEUNINGSINFRASTRUKTUUR VIR DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG WINDKRAGAANLEGTE, SUTHERLAND, WESKAAP EN NOORD-KAAP PROVINSIES

EN

OMGEWINGSIMPAKSTUDIE VAN DIE VOORGESTELDE WYSIGING AAN DIE OMGEWINGSGOEDKEURING VIR DIE SUTHERLAND, SUTHERLAND 2 EN RIETRUG, SUTHERLAND, WESKAAP EN NOORD-KAAP PROVINSIES

Geagte Belanghebende Party

South Africa Mainstream Renewable Power Developments (Pty) Ltd ("Mainstream") het omgewingsmagtiging ontvang by die Nasionale Departement van Omgewingsake (DOS) op 22 Februarie 2012 (DOS verwysingsnommer: 12/12/20/1782, NEAS verwysingsnommer: DEAT/ELA/12225/2011) om 'n hemubare energie aanleg te bou, bestaande uit 'n sonkragaanleg en windkragaanleg. 'n Nie-materiële wysiging aan die omgewingsoedkeuring was ondermeem en is op 06 Oktober 2015 (DOS verwysingsnommer: 12/12/20/1782/AM1) toegestaan. 'n Materiële wysigingsproses aan die omgewingsgoedkeuring was ondermeem en kietrug (DOS verwysingsnommers: 12/12/20/1782/1, 12/12/20/1782/2) en is op 10 November 2016 toegestaan. Die goedkeuring vara ofte ongevenikle goedkeuring (gedateer 22 Februarie 2012) en die gevysigde goedkeuring (gedateer 06 Oktober 2015). Die drie windkragaanlegte kom voor in die Karoo Hoogland Munisipaliteit en die Namakwa Distrik Munisipaliteit, 23 km Suid van Sutherland. 'n Deel van die Sutherland windkragaanleg kom ook voor in die Laingsburg Munisipaliteit en Sentrale Karoo Distrik Munisipaliteit, 50 km Noord van Laingsburg, Weskaap Provinsie.

Hierdie dien as 'n kennisgewing om enige potensiële Geïnteresseerde en/of Belanghebbende Party (G&BP) te laat weet van die die volgende prosesse wat deur Mainstream voorgestel word:

- Materiële wysigingsprosesse om die turbine groottes van die goedgekeurde Sutherland, Sutherland 2 and Rietrug windkragaanglegte te verhoog.
- 2. Basiese Evalueringsprosesse vir die ontwikkeling van ondersteuningsinfrastruktuur, insluitend, maar nie beperk tot, 'n 132 kV kraglyn en 'n substatsie, om sodoende die goedgekeurde windkragaanleg aan die Moyeng Suurplaat windkragaanleg (DOS verwysingsnommer: 12/12/20/1583) se substasie of die Eskom Nuwerust substasie te verbind.

Ingevolge die Nasionale Omgewingsbestuurswet (Wet 107 van 1998, soos gewysig) (NEMA) en die 2014 NEMA Omgewingsimpakstudie Regulasies gepubliseer op 08 Desember 2014 in die staatskennisgewing 38282 en Regulasie 982, 983, 984 en 985, moet die wysigingsproses voldoen aan die vereistes van Artikel 32 van die Regulasies en die Basiese Evaluering aan Artikel 19. Die volgende gelyste aktiwiteite is waarskynlik van toepassing op die Basiese Evalueringsprosesse: GN R 983: Aktiwiteit 9; 11(i); 12 (x), en (xiii); 19(i); 27; en 28(ii) en GN R 985: Aktiwiteit 4 [(a), (ii) en (ee) en (f) en (i) en (aa)]; Aktiwiteit 12 [((a) en (ii)) en ((d) en (ii))]; en Aktiwiteit 4 [(x), (xii), ([a), (ii) en (ff)] en ((f), (i) en (ff)].

'n Geïntegreerde openbare deelname proses word vir die prosesse voorgestel, aangesien die projekte in dieselfde area gaan plaasvind, dieselfde aktiwiteit omskryf en ook op dieselfde windkragaanleg van toepassing is. Aparte verslae sal wel vir elk van die projekte saamgestel en vrycestel word.

G&BP's word hiermee in kennis gestel van die registrasie van belanghebende party die projekte. Die agtergrondsinligting dokument is vir 30-dae beskikbaar vir kommentaar (vanaf 09 Desember 2016 to 01 Februarie 2017, uitsluitend openbare vakansiedae). Harde kopieë van die agtergrondsinligting dokument is beskikbaar by die Laingsburg Openbare Biblioteek, Sutherland Openbare Biblioteek en die Laingsburg en Sutherland Munsispaliteite.

Die projek inligting kan ook afgelaai word vanaf die projekwebtuiste: https://www.csir.co.za/environmental-impact-assessment

U word vriendelik uitgenooi om te registreer en enige kommentaar aan Shawn Johnston by Sustainable Futures ZA binne 30 dae van die kennisgewings te stuur (teen nie later as 01 Februarie 2017). Vir meer inligting, kontak gerus vir: Shawn Johnston by Sustainable Futures ZA op Tei: 0833259965, Faks: 0865102537 of e-pos: swjohnton@mweb. co.za.

Die uwe, Shawn Johnston Proses fasiliteerder Sustainable Futures ZA