

FRONTEER WIND FARM

Makana Local Municipality, Eastern Cape
Province

AVIFAUNA IMPACT ASSESSMENT REPORT



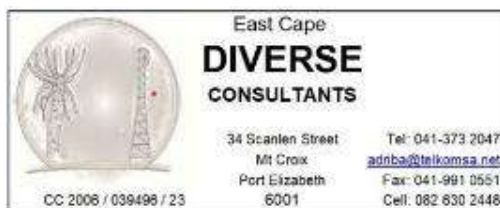
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Executive Summary

It is anticipated that the proposed Fronteer Wind Farm will have a variety of impacts on avifauna, which ranges from low to medium significance with the implementation of the proposed mitigation.

The Fronteer wind farm falls in the Cookhouse REDZ, assessed within the Strategic Environmental Assessment (SEA) report of the Department of Environmental Affairs (2015). It forms one of two wind farms that make up the Eastern block of the Choje cluster of renewable energy developments. This report list 283 bird species while nine Priority species were recorded during the Pre-construction bird monitoring study. These include Blue Crane, Ludwig's Bustard, Denham's Bustard, Southern Black Korhaan, Secretarybird, Verreaux's Eagle, Martial Eagle, Black Harrier and Lanner Falcon.

Two Verreaux's Eagle and two Martial Eagle nests were found in proximity of Fronteer wind farm but outside the appropriate applied buffers. Two Secretarybird territories were noted but no nest was recorded while Jackal Buzzard, African Harrier-hawk, Pale Chanting-goshawk and Rock Kestrel breed in the wider area around the wind farm. No Lanner Falcon was recorded breeding. Few migratory bird species were recorded.

The large terrestrial birds were found in low numbers because of the bushveld limiting their distribution and abundance. High abundance of Southern Black Korhaan were recorded. No Blue Crane nests was found but a few pairs breed in the wider East block of the data collection area. The bushveld has a large diversity of small bush birds.

The site has majority Albany Subtropical Thicket vegetation (bushveld) and to a limited cover of Karoo shrubland. No large croplands or permanent water occur in the area, and no wetlands other than small ground dams (and hence few water birds).

This assessment found the following potential impacts assessed on birds according to the methods provided by Savannah, as:

- Bird collision mortality with turbine blades will be of LOW negative significance.
- Destruction bird habitat during construction will be of LOW negative significance.
- Disturbance of birds during construction (and dismantling) of the wind farm and associated infrastructure will be of MEDIUM negative significance.
- Bird fatalities through Collision and Electrocution on the internal medium voltage powerlines are of LOW negative significance.
- Displacement and disturbance of birds during the operation will be of LOW negative significance.

In conclusion, no significant disturbance impacts have been identified, though mitigation measures must still be implemented to minimise the contribution of the Fronteer Wind farm to the cumulative impact of the whole renewable energy cluster. A range of ornithological mitigation measures will be required, and these are set out in detail in the Ornithological Mitigation Plan (Appendix F). This includes:

- Design Mitigation to avoid higher sensitivity areas including buffers around priority species' nest and roost sites.
- Collision risk reduction (eagles and large terrestrial birds):
 - Increase turbine blade visibility in more sensitive areas;
 - On- and off-site habitat management;
 - Shut-down-on demand, informed by adaptive management programme;
 - Reduce powerline collision risk.
- Comprehensive monitoring of the effectiveness of the mitigation to inform an adaptive management strategy, including post-construction bird surveys, carcass searches and nest/breeding monitoring.

The overall conclusion is that there are likely to be LOW to MEDIUM significant impacts on ornithology as a result of the proposed Fronteer wind farm, assuming that the mitigation measures specified in this report are implemented.

1. INTRODUCTION

Fronteer (Pty) Ltd is proposing the development of a commercial wind farm and associated infrastructure on a site located approximately 12km north-west of Makhanda (Grahamstown) (measured from the centre of the site) within the Makana Local Municipality and the Sarah Baartman District Municipality in the Eastern Cape Province.

A preferred project site with an extent of 5,091ha has been identified by Fronteer (Pty) Ltd as a technically suitable area for the development of the Fronteer Wind Farm with a contracted capacity of up to 213MW that can accommodate up to 38 turbines. The entire project site is located within the Cookhouse Renewable Energy Development Zone (REDZ). Due to the location of the project site within the REDZ, a Basic Assessment (BA) process will be undertaken in accordance with GN114 as formally gazetted on 16 February 2018.

This forms part of a larger cluster of renewable energy facilities, geographically separated into Eastern and Western blocks, consisting of six wind farms (two in the East and four in the West), two solar farms and a 400kV Main Transmission Substation (MTS) in the Makana and Blue Crane Route Local Municipalities. The Fronteer Wind Farm is located in the Eastern block and the site is centred on -33.2192° S latitude and 26.3731°E longitude. Fronteer is neighbouring a second proposed wind farm known as Wind Garden Wind Farm (47 turbines), which has been assessed in a separate AIA report. The Fronteer Wind Farm will connect to the national grid on site to an existing 132kV Eskom power line.

East Cape Diverse Consultants (in collaboration with Ecology Consulting, a UK-based consultancy) has been appointed by Savannah Environmental (Pty) Ltd to conduct the necessary avifaunal impact assessment (including pre-construction monitoring) for this process.

The pre-construction bird monitoring has been designed using the BirdLife South Africa (BLSA) guidance and international best practice (Jenkins *et al.* 2015, SNH 2017, BLSA 2017 Verreaux's eagle guidelines, BLSA 2018 Cape vulture guidelines) and the information in the Strategic Environmental Assessment (SEA) (Department of Environmental Affairs 2015) completed by CSIR for the Cookhouse REDZ Focus Area. The pre-construction bird monitoring data was collected as a combined programme for the entire cluster.

This report assesses the avifaunal impacts of the Fronteer Wind Farm.

1.1. Project Description

The project site comprises the following eight (8) farm portions:

- Remainder of Farm Table Hill Farm No 187
- Portion 2 of Table Hill Farm No 187
- Portion 3 of the Farm Table Hill Farm No 187
- Remainder of the Farm Hounshow No 131
- Portion 1 of Farm Draai Farm No 184
- Portion 1 of Farm No 132
- Portion 1 of Farm Burnt Kraal No 189
- Portion 1 of Farm Table Hill No 187

The Fronteer Wind Farm project will include the following infrastructure, which to enable the wind farm to supply a contracted capacity of up to 213MW:

- Up to 38 wind turbines with a maximum hub height of up to 120m. The tip height of the turbines will be up to 200m;
- A 132kV switching station and a 132/33kV on-site collector substation to be connected via a 132kV overhead power line (twin turn dual circuit). The wind farm will be connected to the national grid

through a connection from the 132/33kV collector substation via the 132kV power line which will connect to the 132kV switching station that will loop in and loop out of the existing Poseidon – Albany 132kV line;

- Concrete turbine foundations and turbine hardstands;
- Temporary laydown areas which will accommodate the boom erection, storage and assembly area;
- Cabling between the turbines, to be laid underground where practical;
- Access roads to the site and between project components with a width of approximately 4,5m;
- A temporary concrete batching plant;
- Staff accommodation (temporary); and
- Operation and Maintenance buildings including a gate house, security building, control centre, offices, warehouses, a workshop and visitors centre.

A development envelope for the placement of the wind energy facility infrastructure (i.e. development footprint) has been identified within the project site and assessed as part of the BA process. The development envelope is 2,689ha in extent and the much smaller development footprint of 49.4ha will be placed and sited within the development envelope. This equates to only 1.8% of the total area.

1.2. Evolution of the Site Design

Two specific areas have been identified for the development of the Choje complex of wind farms, as shown in Figure 1, in an Eastern Block and a Western Block. That Figure illustrates the main habitats across the area (from Mucina and Rutherford 2006). Figure 2 shows the distribution of land cover classes from the 2018 South Africa National Land Cover survey¹ across the area.

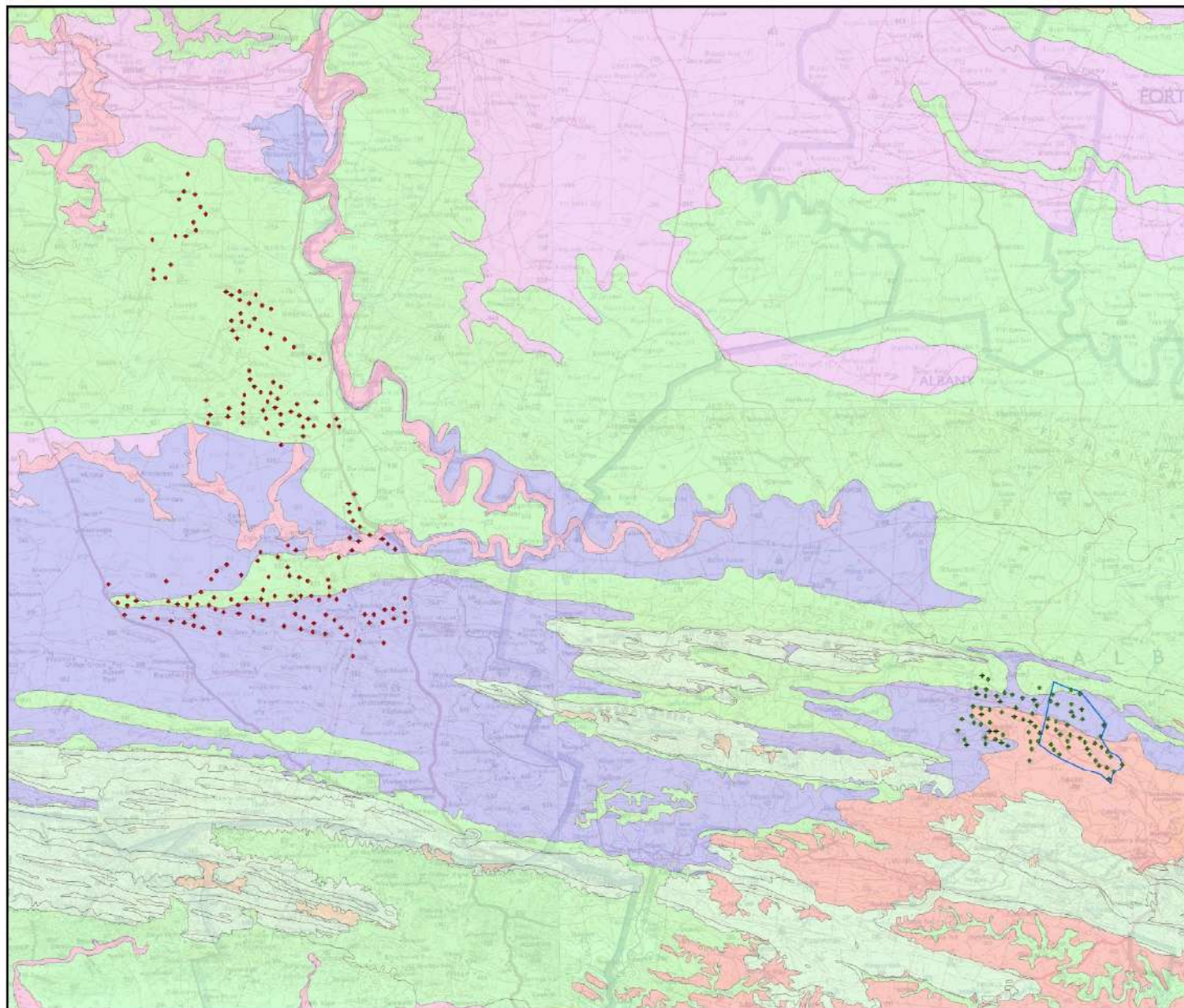
These two blocks have been further sub-divided into six specific zones that will each form the basis of a wind farm application, two in the Eastern Block and four in the Western Block. The Fronteer proposal forms one of these two applications, located in the eastern part of the Eastern Block.

These wind farm development areas were refined in an iterative design process for the wind turbine layouts. The timeline for these changes was as follows:

- February 2019 - initial layout (dated 21/2/19) comprising 139 turbines in the Eastern Block (plus 494 in the Western Block). The initial survey methodology was designed based on this layout.
- August 2019 - second layout iteration (dated 22/8/19). This layout was considerably reduced on the initial layout, and comprised 128 turbines in the Eastern Block (and 297 turbines in the Western Block).
- October 2020 - further refinement of the layout, finalising it for the EIA process. The number of turbines was further reduced to 85 turbines in the Eastern Block (and 175 turbines in the Western Block), removing turbines from more sensitive areas. The proposed turbine locations are shown in Figures 1, 2 and 3.

The proposed Fronteer wind farm now comprises 38 turbines in the Eastern Block.

¹ https://www.environment.gov.za/projectsprogrammes/egis_lander_datasets. Accessed 30/6/20.



**Fronteer
Wind Farm**

FIGURE 1
Current Site Layout and
Mucina & Rutherford
(2006) Biomes

KEY:

- Choje East turbines EIA
- Choje West turbines EIA
- Fronteer Site Boundary

BIOME

- Albany Thicket Biome
- Azonal Vegetation
- Desert Biome
- Forests
- Fynbos Biome
- Grassland Biome
- Indian Ocean Coastal Belt
- Nama-Karoo Biome
- Savanna Biome
- Succulent Karoo Biome
- Waterbodies



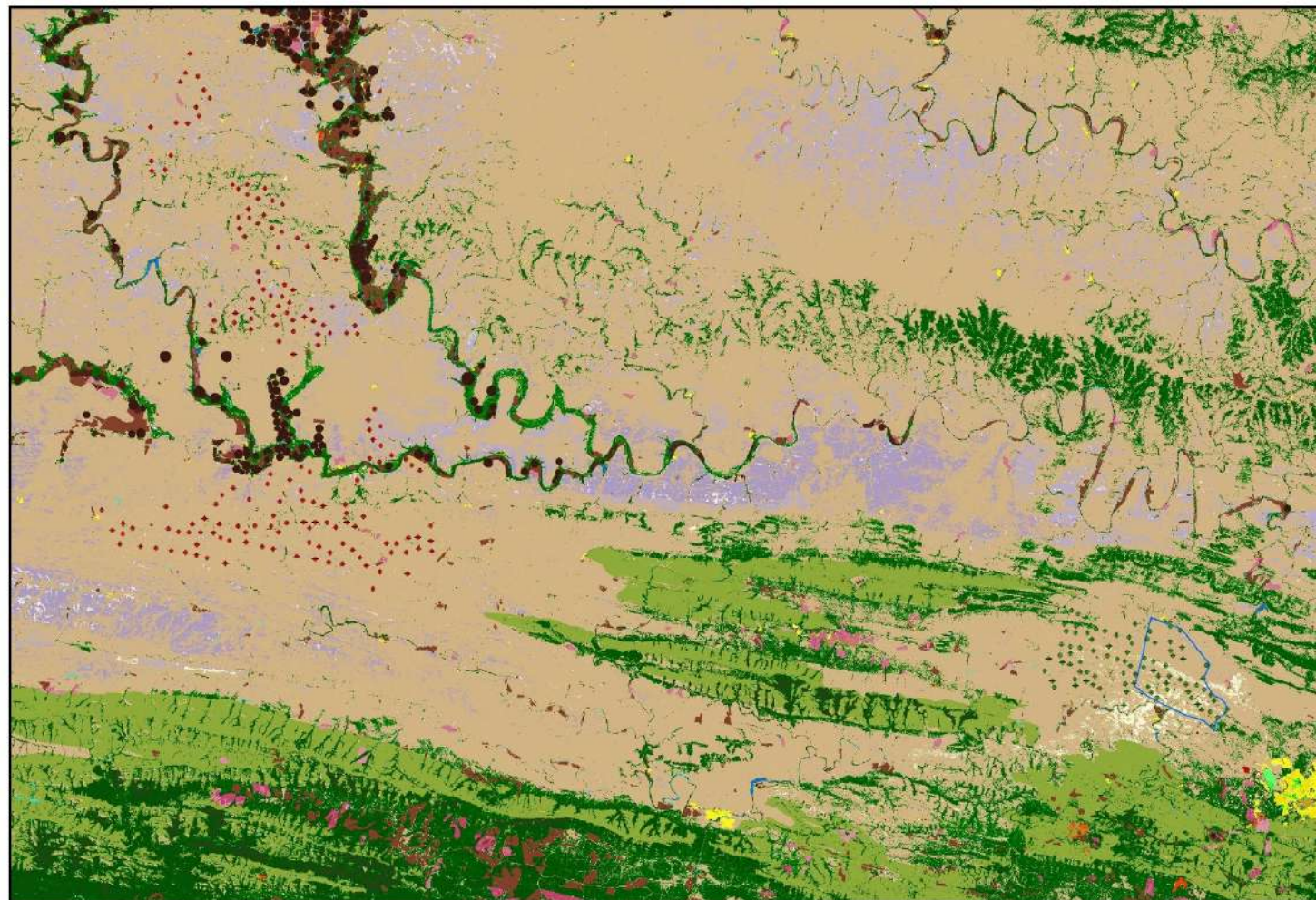
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PROJECT NO: N/A DRAWING NO: N/A

REVISIONS: EC-2020-1

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Frontier Wind Farm

FIGURE 2
Current Site Layout and
Land Cover (2018)
Classes

KEY:

- ✦ Choji West turbines EIA
- ✦ Choji East turbines EIA
- Frontier Site Boundary



Legend

contiguous (indigenous) forest	low shrubland (nama karoo)	herbaceous wetlands (previously mapped)	commercial annual crops non-pivot irrigated	residential formal (bush)	urban recreational fields (bush)
contiguous low forest & thicket	sparsely wooded grassland	natural rock surfaces	commercial annual crops rain-fed / dryland	residential formal (low veg / grass)	urban recreational fields (grass)
dense forest & woodland	natural grassland	dry pans	subsistence / small-scale annual crops	residential formal (bare)	urban recreational fields (bare)
open woodland	natural rivers	eroded lands	fallow land & old fields (trees)	residential informal (tree)	commercial
contiguous & dense plantation forest	natural pans (flooded @ observation times)	bare riverbed material	fallow land & old fields (bush)	residential informal (low veg / grass)	industrial
open & sparse plantation forest	artificial dams (including canals)	other bare	fallow land & old fields (grass)	residential informal (bare)	roads & rails (major linear)
temporary unplanted (clear-felled) plantation forest	artificial sewage ponds	cultivated commercial permanent orchards	fallow land & old fields (bare)	village scattered (bare & low veg / grss combo)	mines: extraction pits, quarries
low shrubland (other)	artificial flooded mine pits	cultivated commercial permanent pineapples	fallow land & old fields (low shrub)	village dense (bare & low veg / grss combo)	land-fills
low shrubland (lymbos)	herbaceous wetlands (currently mapped)	commercial annual crops pivot irrigated	residential formal (tree)	urban recreational fields (tree)	fallow land & old fields (wetlands)

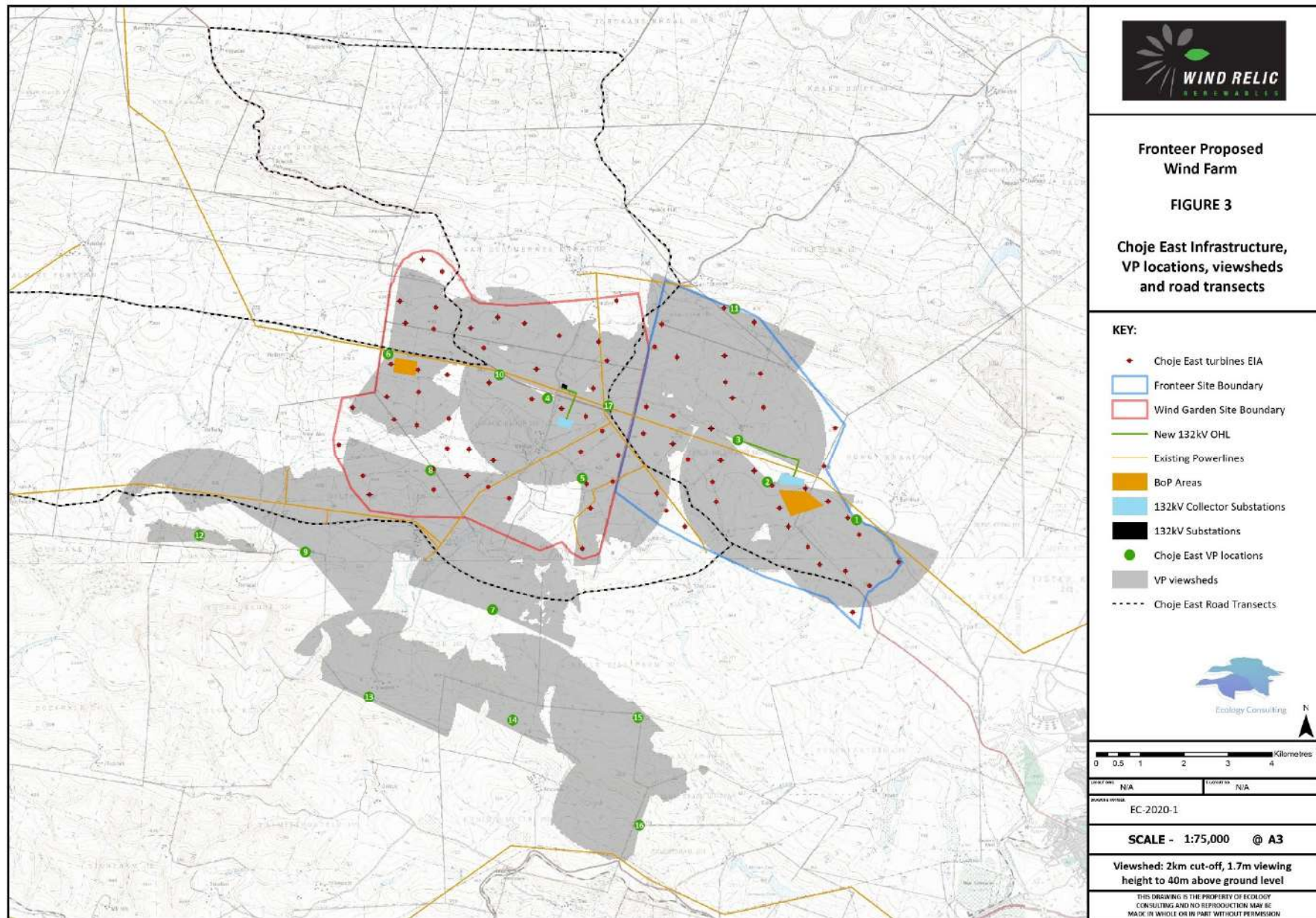
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1.3. Power line and Associated Infrastructure Areas

The map in Figure 3 shows the Fronteer wind farm study area in the blue area (on the eastern side) with the 38 turbine positions. It also plots the 17 bird pre-construction vantage points used across the Eastern block, with their viewsheds, and the 84km vehicle road transect route (dotted lines). The map also shows the locations of the other proposed wind farm in the Choje East complex (Wind Garden).

Figure 3 also shows the additional infrastructure to be constructed as part of the Fronteer wind farm, as described in the Project Description. This includes 1km of new 132kV overhead powerline, that will connect into a new Collector substation (100x100m area) with the existing Eskom 132kV powerline via a new Eskom substation (100x100m area). Additionally, there will be working areas required for the construction site buildings, storage areas and concrete batching of about 12ha and camp site for staff accommodation of about 6ha., which will also require vegetation clearance and hence loss of bird habitat.

2. DESIGN AND METHODOLOGY OF THE BIRD STUDY

This section of the report sets out the preliminary information on the area's ornithological sensitivities that were obtained from the Strategic Environmental Assessment (SEA) report of the Department of Environmental Affairs (2015), that was used to inform the pre-construction study, in conjunction with BirdLife South Africa (BLSA) guidance, international best practice (Jenkins *et al.* 2015, SNH 2017, BLSA 2017, BLSA 2018), and data from initial site surveys. The surveys and the wind farm site layout were designed following an iterative process, refining the design of each in light of bird data being collected and changes to the proposed site layout.

2.1. Strategic Environmental Assessment – Desk study

The site lies within the Cookhouse Focus Area, which the Strategic Environmental Assessment (SEA) (Department of Environmental Affairs 2015) describes as follows:

"This FA (7,366 km²) falls within the Albany Thicket Biome, at the interface between the Albany Thicket and the Sub-escarpment Grassland Bioregions (Mucina and Rutherford 2006). The area features open, hilly grassland, grading into wooded and succulent-rich thicket vegetation along the drainage lines and forest patches along the base of the escarpment. It is bordered by the Winterberge, the Bloemfonteinberge and the Groot-Bruintjieshoogte mountains to the north, crossed by a series of smaller mountains extending to the north-east of Grahamstown, and traversed by the Great and Little Fish Rivers, and the Koonap River, which form deeply incised valleys through the central plains.

The SEA notes that the Focus Area is not located close to any recognised national Important Bird Areas, but that it does support a diverse avifauna. It identified at least 283 bird species that could regularly occur, using data from the South Africa bird atlas (SABAP) project. This includes 19 red-listed species, six of which are endemic (Barnes 1998, 2000); Ludwig's Bustard, Blue Crane, Cape Vulture, Black Harrier, Melodious Lark and African Rock Pipit. The key ornithological features of the Cookhouse Focus Area SEA (from Table 3 from the SEA Appendix A5) is given in Table 1.

Table 1. Key ornithological features of the Cookhouse Focus Area SEA (source: Table 3 from the SEA (Appendix A5), updated for current IUCN status.

Species	Threat status		SA Endemism	National sensitivity rating (wind only)	SABAP2 Rep Rate (%)	FA-specific predicted susceptibility to	
	Regional	Global				Wind	Solar
Denham's Bustard	Vulnerable	Near-threatened	-	19	1.89	High	Moderate
Ludwig's Bustard	Endangered	Endangered	Near-endemic	14	2.83	High	Moderate
Kori Bustard	Near-threatened	Near-threatened	-	38	1.65	High	Moderate
Southern Black Korhaan	Vulnerable	Vulnerable	Endemic	36	8.96	Moderate	Moderate
White-bellied Korhaan	Vulnerable	Least concern	-	35	3.77	Moderate	Moderate
Blue Crane	Near-threatened	Vulnerable	Near-endemic	13	9.91	High	Moderate
African Fish-Eagle	-	-	-	24	12.50	High	Low

Species	Threat status		SA Endemism	National sensitivity rating (wind only)	SABAP2 Rep Rate (%)	FA-specific predicted susceptibility to	
	Regional	Global				Wind	Solar
Cape Vulture	Endangered	Endangered	Near-endemic	1	0.94	Very high	Low
Black Harrier	Endangered	Endangered	Near-endemic	7	6.37	Moderate	Moderate
Jackal Buzzard	-	-	Near-endemic	42	26.18	High	Low
Verreaux's Eagle	Vulnerable	Least concern	-	3	3.30	Very high	Low
Booted Eagle	-	-	-	57	5.19	High	Low
Martial Eagle	Endangered	Endangered	-	5	4.72	Very high	Moderate
African Crowned Eagle	Vulnerable	Near-threatened	-	27	4.25	Very high	Low
Secretarybird	Vulnerable	Endangered	-	12	5.42	High	Moderate
Lesser Kestrel	-	-	-	64	0.47	High	Moderate
Amur Falcon	-	-	-	65	2.59	High	Moderate
Lanner Falcon	Vulnerable	Least concern	-	20	2.59	High	Low
Melodious Lark	Least concern	Near-threatened	Near-endemic	92	1.42	Low	High

The SEA sensitivity mapping was based on the data available at the time on these species' distributions, and on habitat features associated with these species, including high voltage (>132kV) power lines (which could be used for roosting sites by Cape Vultures and nesting large eagles, buzzards and falcons), larger river corridors (potential bird flyway and waterbird communities), wetlands, and an historic migratory kestrel roost site. The key ornithological features of the Cookhouse Focus Area SEA sensitivity mapping are given in Table 2 (extract from Table 4 of the SEA Appendix A5).

Table 2. Cookhouse Focus Area SEA key ornithological features used in the sensitivity mapping (source: Table 4 of the SEA Appendix A5).

Ornithological feature	Information source	Sensitivity and buffer extent
Power lines ≥ 132 kV possibly used by roosting Cape Vultures and nesting large eagles, buzzards, falcons	Eskom Networks layer, 2014	Medium: 5 km
Great Fish River as an avian fly-way; supports waterbirds and riparian communities	NFEPA Rivers layer, 2011	Very High: 1 km from edge of full river

Ornithological feature	Information source	Sensitivity and buffer extent
Little Fish River as an avian fly-way; supports waterbirds and riparian communities	NFEPA Rivers layer, 2011	Very High: 1 km from edge of full river
Koonap River as an avian fly-way; supports waterbirds and riparian communities	NFEPA Rivers layer, 2011	Very High: 1 km from edge of full river
Selected CWAC site, with high total counts, spp. diversities, and presence of Red-listed species	CWAC data base, ADU	Very High: 2 km from edge
Known Cape Vulture roost site at Agieskloof / Lichtenstein	EWT Knowledge Management Database, BLSA, Boshoff <i>et al.</i> 2009 a and b	Very High: 20 km
		High: 40 km
Known Blue Crane nesting areas	EWT Knowledge Management Database	Very High: 150 m
		High: 300 m
Past and possible future migrating kestrel roost site	EWT Knowledge Management Database, BLSA	High: 5 km
Known Lanner Falcon nest sites	A. Stephenson Unpubl. data, Jenkins <i>et al.</i> 2012b, 2013a	Very High: 1 km
		High: 3 km
Presence data for a suite of threatened, impact susceptible large terrestrial birds	SABAP2, ADU	Medium: No buffer

Additionally, though not specifically described in Table 2, an extensive area of high sensitivity is identified in the SEA mapping as 'Cliffs (slope >75°)', presumably for its potential to support large raptors that could be sensitive to wind farm development (such as Verreaux's Eagle).

A key conclusion with regard to this sensitivity mapping is that although potentially important habitats such as cliffs and wetlands/river corridors have been identified, at the time of the SEA analysis there was a lack of detailed knowledge of the baseline conditions, which could mean that (a) important sensitivities may not have been mapped, and (b) some areas mapped in the SEA as higher sensitivity on a precautionary basis may actually not support important bird populations that would be a constraint to the wind farm. The programme of site-based bird baseline surveys have, however, addressed this issue and provided a more accurate local picture of the ornithological sensitivities.

The proposed Fronteer site lies outside several of the key constraint areas identified in the Focus Area SEA. It is beyond the 40km buffer from a Cape Vulture roost (which was used in the SEA to identify high sensitivity areas) and outside the BLSA-recommended 50km buffer to identify high sensitivity areas from main vulture roosts, being 75km from the nearest regular roost at Aggieskloof.

Two of the five Lanner Falcon nests in the Focus Area reported in the SEA lie adjacent to the Eastern Block, though the 2019-20 surveys did not find either territory to be occupied. One is 3.9km from the closest proposed Fronteer Wind Farm wind turbine, the other 10.1km (Figure 4). The SEA considered the area within 1km of these nests to be of a very high sensitivity, and within 3km to be of a high sensitivity. At this distance from the wind farm (and given the lack of regular flights through the site), any significant effects on this species should be unlikely (though have still been fully assessed below).

The SEA identified a range of other key species that are likely to use the area, but no detailed spatial information is available. It is likely that there are other bird sensitivities that could be an issue with the proposed wind farm, but there is not any further information available from the SEA that would enable that risk to be determined. Some of these will be associated with particular habitats, e.g. cliffs and rocky outcrops for nesting Verreaux's Eagle, open grassland for bustards and cranes, wetlands and river corridors for waterbirds, but specific nesting locations for most of these key species were not identified in the SEA. There would therefore be a higher risk of encountering these species in those habitats, but there may be extensive areas of those habitats where they are not present. The SEA mapped cliffs as areas of higher ornithological

risk for this reason, buffered by a 3km distance. The SEA also mapped river corridors as higher risk areas, with a 1km buffer.

2.2. Guidance Documents on Baseline Bird Surveys

The design of the bird study drew primarily on BirdLife South Africa (BLSA) guidance, including general guidance on surveys methods and assessment (Jenkins et al. 2015), as well as being informed by international best practice (SNH 2017). As set out in that guidance, the baseline surveys used a range of methods to obtain quantitative data on the distribution and abundance of small birds (using walked transects), large terrestrial birds (using driven vehicle transects), focal point surveys of key ornithological features such as priority species nests and communal roosts and vantage point surveys to map priority species flight activity.

The surveys were carried out over the recommended 12 calendar months (though with a 1-month gap in May 2020 due to Covid-19 restrictions). For the VP surveys the BLSA recommended minimum of 48 hours survey per VP was achieved for all VPs. Coverage of the proposed wind farm site exceeded the BLSA-recommended 75% minimum (84% was achieved across the Choje East survey area as a whole covering the two wind farm sites).

The study area was defined to include areas outside the potential impact zone of the wind farm, in order to provide a reference area for post-construction monitoring (to compare priority species' numbers, distribution and flight activity in that area with that in the wind farm site) and enable a Before-After-Control-Impact analysis to be carried out.

Additional specific guidance produced for particular species of importance was also taken into account, including:

- Verreaux's Eagle (BLSA 2017): dedicated surveys were carried to identify nest sites within and around the site (up to 3km). BLSA advise that baseline surveys should be extended to two years where this species is at significant risk, and there are two seasons' nest surveys (2019 and 2020). Survey effort in proximity to Verreaux's Eagle nests were not increased to 72 hours as, through early design mitigation, no nests were located within 1.5km of any proposed turbine locations.
- Cape Vulture (BLSA 2018): the area more than 50km of a vulture roost (75km), so it is not classed as high sensitivity following this guidance and therefore would not require additional survey effort with regard to this species.
- Black Harrier (Simmons et al 2020): areas potentially suitable for this species checked out during initial surveys in February-May 2019 but no breeding birds were found. The same result was recorded from the from ongoing surveys through to August 2020, with no data to contradict these initial findings. Overall, there was no evidence that the study area is important for this species.

In summary, the baseline surveys are consistent with BLSA guidance, apart from the following:

- The recommended increase in VP survey hours to 72 was undertaken at key locations where turbines were proposed and where collision risk to species of conservation concern was higher but not all 'high sensitivity' areas. The focus of the work was to obtain key data to inform site design and risk (and at the Fronteer site particularly focussed on Martial Eagle). There has been a very extensive VP survey effort that provides extensive data on all priority species.
- The surveys have not met the BLSA recommendation for two years' baseline in areas of higher sensitivity for Verreaux's Eagle, but have included two seasons for the Verreaux's Eagle breeding surveys.

Furthermore, the spatial modelling that has been undertaken has provided much more insight into the birds' behaviour and site use, than the basic baseline monitoring alone, which has provided an enhanced, more reliable, baseline for the assessment.

The application of these guidance documents in the context of the wind farm site design and mitigation are dealt with in the relevant sections below.

2.3. Terms of reference of the Bird Study

The scope of this report is to assess all expected impacts on birds of the proposed Fronteer wind farm and additional infrastructure, including:

- the effects of the habitat loss on birds;
- the disturbance and displacement of birds during the construction and the dismantling;
- the effect during the operation of the wind farm and other infrastructure, including the power lines.

This Avifauna Impact Assessment Report is required to inform and contribute towards the Basic Assessment phase of the environmental application in terms of NEMA, 1998, and also to satisfy the requirements of Appendix 6 of GN.R982 of NEMA, 1998 (as amended by GNR 326 2017).

SANBI's (2020) National Environmental Screening Reports were not available to inform the baseline survey protocol as they post-date the time that those surveys were designed. It is not considered that they would have materially affected the monitoring strategy had they been available. The survey design pre-dates the avifaunal protocol published under Government Notice No. 320 in The National Gazette, No. 43110 of 20 March, 2020: "National Environmental Management Act (107/1998) Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of sections 24 (5) (a) and (h) and 44 of the Act, when applying for Environmental Authorisation" the compilation of the report post-dates the publication of this legislation and has taken into account the terms of reference relevant to the reporting requirement.

2.4. Pre-construction monitoring Methods

2.4.1. Development of the Survey Methods

The pre-construction bird monitoring methodology was designed at the first stage to address the fact that it was not practically possible to cover the whole of the initial proposed 139-turbine development area across the Eastern Block. Surveys were designed to collect data on (a) key species abundance/distribution, and (b) key species flight activity, to determine the numbers at risk from disturbance and collision.

A site visit was undertaken in January 2019 to inform the initial survey methodology, which was followed up by four visits during February-May 2019 to ground truth the information from the desk study and confirm current eagle and other important raptor breeding locations (to feed into the wind farm site design). The main baseline surveys commenced in June 2019.

Following the revision of the wind farm layout in August 2019 (reducing the number of turbines in the Eastern Block to 128), it was possible to achieve a fuller coverage of the potential impact zone, and the previous sampling methodology was refined to provide a level of coverage in line with BLSA's recommended minimum 75%, through a combination of a reduction in the size of the overall wind farm and an increased number of Vantage Points in the Eastern Block from 11 to 17. This survey protocol was continued through to August 2020 to give 12 months' coverage from all VPs (though with surveys suspended in April 2020 due to Covid-19 restrictions before restarting in May 2020).

The following principles were adopted for the survey design:

- The initial site design has avoided higher sensitivity ornithological features, (where these are known, as identified in the SEA). This continued as an iterative process as more data became available from baseline surveys;
- Key ornithological risks from the project were identified as collision and disturbance. Key species at risk were identified, and updated as more baseline data became available. These species were the focus of the assessment;

- The surveys followed BLSA (Jenkins *et al.* 2015) recommended survey methodologies where possible. Initially a sampling regime was developed to inform modelling of ornithological risks. This specifically included spatial modelling of flight density, flight heights, flights at risk of collision with wind turbines and overhead lines, and bird populations at risk of disturbance (and availability of alternative habitat to better understand impacts of that disturbance). The work drew on the available literature for current developments in bird-habitat modelling, and predicting flight activity (including McLeod *et al.* 2002, Reid *et al.* 2015 and BirdLife South Africa 2017, Fielding *et al.* 2019, and lastly Murgatroyd *et al.* 2021 when it became available). This same analytical approach was followed through the baseline data collection and assessment process, though with coverage meeting the BLSA guidance after the layout had been reduced in August 2019 and more VPs had been incorporated into the surveys.

2.4.2. Survey Area

The survey area was defined to cover the maximum extent of the possible wind turbine envelope (plus relevant buffers as appropriate) and other associated development such as grid connection cables. It was updated in August 2019 to the area shown in Figure 3, to reflect the reduction in the extent of the proposed wind farm across the Eastern Block, and retained at that extent through the remainder of the surveys (to give 12 months' coverage of this survey area).

2.4.3. Control site

An extensive reference area around the wind farm sites (outside the potential impact zone of the wind farm) was surveyed and will be available for post-construction before/after comparison, for example, for before/after gradient analysis. This is shown in Figure 3 as the grey VP viewsheds that lie outside the wind farm sites to the south, with a minimum 48 hours' surveys carried out at each of seven VPs (covering an area of about 43km²).

These areas were also surveyed by 12 monthly vehicle transects (along the route shown in Figure 3) and 12 monthly walking transects (located at each VP, as for the main site surveys).

2.4.4. Vantage Point Surveys

Vantage point (VP) surveys were carried out taking into account the BLSA-recommended survey methodology, based on sample plots viewing to 2km over approximately 180° arcs (giving about 6km² coverage per VP). The specific aim of the surveys was to collect data on key species flight activity to enable estimates to be made of:

- The time each species spends flying over the survey area;
- The relative use each species makes of different parts of the survey area;
- The proportion of flying time each species spends at different elevations above the ground.

All flight lines of target species were mapped, and the flight height of each flock recorded. As 360° viewing was not required at any VP, so a single observer was considered sufficient at each.

The following species were recorded as target species, defined to include all species that could be at risk of collision with the wind turbines:

- All birds of prey and owls;
- All cranes and bustards;
- Large flocks (>100 birds) of other species;
- Other species/sightings considered of note.

A total of 17 VPs were used for the Eastern Block, six of which covered the Fronteer site (either within or over-looking the site). The location of the vantage points and the computer-generated prediction of viewsheds from those VPs (showing the areas visible at 40m above the ground, the lowest point that the rotor sweep of the proposed turbines would reach, from each VP) are shown in Figure 3 in relation to the current Fronteer proposed wind farm layout and for the other Eastern Block proposal (Wind Garden). This covers 84% the proposed Eastern Block turbines (in line with the minimum BLSA-recommended 75% coverage). For the Fronteer wind farm on its own, coverage of the full risk volume was achieved for 33 of the 38 turbine locations (87%).

Current BLSA guidance recommends at least 48 hours per VP, with 12 hours minimum over each of the four seasons, so for the surveys a minimum of four hours surveys have been carried out per VP per month. This target was met for all VPs. A total of 48-56 hours of surveys (mean 50.2 hours) were obtained from each of the six VPs covering the Fronteer site.

All target birds were recorded, irrespective of their distance from the vantage point. Observations were carried out throughout daylight hours (to cover the full daylight period over the survey visits) but not in periods of severely reduced visibility (<3km). Vantage point surveys were usually carried out for a 4-hour block, with a gap of at least 30 minutes for a rest period between surveys to avoid observer fatigue.

During the observation periods all target species flights were mapped and cross-referenced to a standard recording form using a numbering system, and the flight height of each recorded. To estimate flight height as accurately as possible, available reference features (e.g. met masts, summit/ridgelines) were used. Flight heights were estimated as accurately as possible, i.e. not summarised to height classes. Below 10m it was possible to estimate to 1m, between 10 and 20m to 2m, between 20m and 50m to 5m, and above 50m to 10m. In any case of uncertainty, an estimate of the upper and lower range of height were recorded. When birds were observed over an extended period, estimates of flight height were recorded every 30 seconds. The activity during each flight (e.g. striking prey, displaying, food passing) was also recorded. Particular attention was paid to any observations of birds at rotor height crossing the proposed wind farm site that would be at risk of collision.

2.4.5. Raptor Surveys

Breeding raptor surveys were carried out between June 2019 and August 2020, checking all known and other possible raptor nest sites within a 5km buffer of the wind farm site. This included checks of all potential Black Harrier nesting habitat for the presence of this species across the survey area (Simmons et al. 2020). These included mini-VP surveys (VP-type watches but for shorter time periods) and walkover surveys, focussing on likely habitat/nesting sites (which were initially identified from the site visit and from inspection of aerial photographs of the area). Repeat visits were made to monitor range occupancy and breeding success. The following visit protocol for each range was implemented through the breeding period: visit 1 to check for occupancy of the range, visit 2 to locate active nests, visit 3 to check for young, and visit 4 to check for fledged young. This included surveys for all key raptors breeding in the survey area, but with particular focus on Verreaux's and Martial Eagles. A first visit during March 2019 to inform the scoping process was followed up with at least three further visits through 2019 and another four in 2020, focusing on key species' breeding periods. Cape Vulture do not breed the region, so were not included in these surveys.

2.4.6. Vehicle Transect Surveys

Vehicle Transect Surveys were driven along all of the accessible roads within each area (83km in the Eastern Block and 150km in the Western Block), stopping at regular intervals to scan open habitats, counting and mapping the location of all target species encountered. This enabled rapid coverage of wide areas, where vegetation allows adequate viewing, to obtain data particularly on raptors, bustards, storks and cranes. The surveys were undertaken over two days each month for the Western Block and one day for the Eastern Block, to give a total of 12 surveys for each. The Eastern Block vehicle transect route is shown in Figure 3. There was a total length of 8.8km of road transect within the Fronteer site (plus a 500m buffer).

2.4.7. Wetland Surveys

Though there are no Coordinated Waterbird Counts (CWAC) wetlands of importance within either the Western or the Eastern Block, there are several areas of wetland habitat present (predominantly around reservoirs for agricultural irrigation, along river corridors). Each wetland site was visited at least once each month to undertake a count of all of the waterbirds present. There were two dams (D3 and D4) within the Fronteer Wind Farm site, but these remained dry through the survey period and were not regularly used by any waterbirds.

In addition to the wetland areas, it became apparent during the initial surveys that many of the irrigated agricultural areas ('pivots') also supported a range of larger terrestrial bird species, so these were also covered as part of these surveys. None of these areas were, however, within the Fronteer Wind Farm site.

2.4.8. Small Terrestrial Bird Surveys (Walking Transect Surveys)

Walking transects were undertaken at each VP location within the site (i.e. four for the Fronteer site) to provide sample data on the abundance of small terrestrial birds within the survey area. Transects were walked for 20 minutes at a rate of 5 minutes per 100m at each VP each month, to provide an index of small bird abundance across the survey area. This gave a total of 1.6km of walking transect within the Fronteer site.

2.5. Screening for Assessment

A two-stage screening exercise was undertaken to determine the bird species to take forward for more detailed assessment. Firstly all '**Species of Conservation Concern**' using the study area were identified on the basis of their conservation value. This included all South African red-listed species and those on the IUCN red list (near-threatened status and higher concern).

The second stage identified the '**Priority Species**' for the Fronteer assessment, i.e. the 'Species of Conservation Concern' that were potentially vulnerable to impacts from the wind farm and its associated infrastructure. This include those species that were at risk of collision (i.e. those that were recorded flying through the wind farm site at rotor height) or could be at risk of disturbance and/or powerline impacts (i.e. those that occurred within the potential impact zone of the wind farm and were potentially vulnerable to these impacts).

3. IDENTIFYING THE IMPACTS

3.1. Potential Effects of a Wind Farm on Birds

The main potential effects of wind farms on birds are considered to be direct loss of breeding or feeding habitat, potential collision risk and indirect loss of habitat from disturbance (either temporary during construction or more permanent from operating turbines) (Percival 2005, Drewitt and Langston 2006, Gove *et al.* 2013). Each of these are considered in turn in the following sections.

3.2. Direct effects: loss of habitat

This would be an effect of negligible magnitude, with only a very small area taken up by the turbine bases and access tracks/roads. Use of existing tracks/roads and the careful selection of routes for the access tracks/roads and turbine locations, alongside use of proven construction techniques would ensure that such effects on birds would be of negligible magnitude (even in a local context) and would not be significant. In addition, the developer has committed to the production of a Construction Method Statement that will be agreed with BLSA and other Stakeholders before construction commences, and would follow industry best practice.

3.3. Direct effects: collision risk

There have been a number of wind farms that have caused bird mortalities through collision, but their characteristics are generally quite different to those at the proposed Fronteer site. Most notably, at Altamont Pass in California and Tarifa in southern Spain, large numbers of raptors have been killed (Orloff and Flannery 1992, Janss 1998, Thelander *et al.* 2003). Such problems have occurred where large numbers of sensitive species occur in close proximity to very large numbers (hundreds/thousands) of turbines, and usually also where the wind farm area provides a particularly attractive feeding resource. At Altamont, for example, the wind turbine bases provided an attractive shelter for ground squirrels which themselves provided an attractive raptor foraging resource (Thelander *et al.* 2003).

A specific problem has been identified for old world vultures, which have much the highest numbers of reported raptor collisions (Hotker *et al.* 2004, Illner 2011). Martin *et al.* (2012) reported that these species have large blind areas in their field of vision above, below and behind the head, such that with the head positions typically adopted by foraging vultures, they will often be blind in the direction of travel. This would make them particularly vulnerable to collision with wind turbines and the studies that have been undertaken bare out this conclusion (Janss 1998, Lucas *et al.* 2012). Vultures also have a high wind loading, reducing their manoeuvrability which also increases their vulnerability to collision (Janss 2000, Barrios and Rodríguez, 2004; Lucas *et al.*, 2008). In addition to this, wind farms have been located in areas of high vulture food resource and several of their populations are vulnerable to additional mortality (Carrete *et al.* 2009).

Another species clearly more vulnerable to collision with wind turbines is the White-tailed Eagle. Small numbers of collisions have been reported at several wind farms including in Germany and Poland, but at one particular site rather more fatalities have occurred, Smøla in NW Norway (an average of 8 collisions per year, May *et al.* 2010). In Australia, White-bellied Sea Eagle and Wedge-tailed Eagle have also both been demonstrated to be vulnerable to collision (Hull and Muir 2013).

Golden Eagles have also been reported as collision victims at wind farms, but generally at a low rate in comparison with vultures and White-tailed Eagles. Whitfield (2009) reviewed the avoidance rates that this species has exhibited and reported estimates varying between 98.64 % and 99.89 % depending on site and uncertainty associated with observed mortality rates before and after adjustment for potential biases. An overall 'worst case' estimate weighted by the scale of study was 99.33 % and the mean unweighted 'worst case' (lowest) avoidance rate for the four wind farms was 99.19 %, and adoption of a precautionary value

of 99.0 % was advised for use in wind farm assessments (and adopted by SNH in their guidance, Urquhart 2010, SNH 2017).

Collision risk of raptors has been shown to be affected by wind conditions (Johnston et al. 2014). That study found that Golden Eagles migrating over a wind farm in the Rocky Mountains experienced lower collision risk with increased wind speed and increased risk under head- and tailwinds when compared with crosswinds.

In wind farm sites with similar large raptor flight densities to Fronteer, collision rates have generally been very low and are not considered to be significant (Meek et al. 1993, Tyler 1995, Dulas 1995, EAS 1997, Bioscan 2001, Percival et al. 2008, Percival et al. 2009a). A study of Golden Eagles at Beinn an Tuirc in Scotland (Walker et al. 2005) has shown them to largely avoid the wind farm site after construction, with a resultant reduction in collision risk. Marsh Harrier, too, has been found to show a similar avoidance of the proximity of wind turbines, with flight density post-construction reduced by 94% within 200m of turbines (Percival et al. 2009a, Percival et al. 2009b). Studies of Red Kite and Hen Harrier in the UK have found they too have exhibited high rates of avoidance of collision (Whitfield and Madders 2006a and 2006b).

Sites where higher numbers of raptor collisions have occurred generally have supported a high density of flight activity that has been maintained post-construction, often associated with attractive ecological resources within the wind farm site, resulting in attraction into the wind farm rather than avoidance.

The key risk features can be summarised as:

- High turbine numbers;
- Turbine design – older design lattice towers can provide a perching resource;
- High bird density within the wind farm – particularly where there is a rich food resource within the wind farm, or attractive breeding sites;
- Source of distraction in close proximity to turbines, e.g. food resource at turbine bases, breeding displays;
- Vultures have a specific issue with their limited field of vision, and a high wing loading that reduces their manoeuvrability;
- Particular vulnerability of populations to additional mortality (e.g. Egyptian vulture – where wind farms have been implicated in population decline often where acting in combination with other factors, Carrete et al. 2009).

3.4. Collision risk in South Africa

Ralston-Paton *et al.* (2017) reviewed the results of operational phase bird monitoring at eight wind farms in South Africa ranging in size from 9 to 66 turbines and totalling 294 turbines (or 625MW). Hub height ranged from 80 to 115m (mean of 87.8m) and rotor diameter from 88 to 113m (mean of 102.4m). The estimated fatality rate at the wind farms (accounting for detection rates and scavenger removal) ranged from 2.06 to 8.95 birds per turbine per year. The mean fatality rate was 4.1 birds per turbine per year. This places South Africa within the range of fatality rates that have been reported for North America and Europe.

The composition of the South African bird fatalities by family group was as follows: Unknown 5%; Waterfowl 3%; Water birds other 2%; Cormorants and Darters 1%; Shorebirds, Lapwings and gulls 2%; Large terrestrial birds 2%; Gamebirds 4%; Flufftails and coots 2%; Songbirds 26%; Swifts, swallows and martins 12%; Pigeons and doves 2%; Barbets, mousebirds and cuckoo's 1%; Ravens and crows 1%; Owls 1%; and Diurnal raptors 36%. Reported collisions included a range of threatened species including three Blue Cranes, five Verreaux's Eagles, two Martial Eagles, and five Black Harriers.

Perold et al. (2020) published a further review in which they reported bird collision rates from 20 wind farms in South Africa. They estimated a mean fatality rate of 4.6 birds per turbine per year, similar to that reported previously by Ralston-Paton et al. (2017) and also within a similar range to those reported in the northern hemisphere. They showed a wide diversity of bird species collided, and a range of species of conservation concern including Cape Vulture (10), Black Harrier (6), Martial Eagle (4), Blue Crane (8), Southern Black Korhaan (5), Verreaux's Eagle (6) and Lanner falcon (6).

3.5. Collision risk mitigation: review

The mitigation of collision risk has been recently reviewed by Marques et al (2014). This publication outlined a range of measures that have been implemented at existing wind farms in order to reduce collision risk. It includes details of several successful schemes, including:

- **Turbine shutdown on demand** - Lucas et al. (2012) showed that wind turbine shutdown on demand halved Griffon Vulture fatalities in Andalusia, Spain, with only a marginal (0.07%) reduction in energy production. This study used human observers but automated (radar and video-based) systems are also now becoming available (Collier et al. 2011; Desholm et al. 2006).
- **Restriction of turbine operation** – this involves avoiding operation of the turbines at key risk times. This has been very effective for bats (Arnett et al. 2010), where reducing turbine operation during periods of low wind speeds reduced bat mortality by 44% - 93%, with marginal annual power loss (<1% of total annual output). For birds (including at the Fronteer site) it is less likely to be such a useful tool as defining the higher risk periods is more difficult and it is unlikely that such a large reduction would be achievable without a much greater loss in power output.
- **Habitat management** – these schemes are usually implemented to reduce the attractiveness of the wind farm site for foraging (e.g. removal of carcasses for carrion feeding species) whilst at the same time increasing food availability elsewhere (to draw birds away from the wind farm and at the same time offset lost foraging opportunity) (Walker et al. 2005).
- **Increasing turbine visibility** – laboratory experiments have shown this to be a potentially effective tool, and there has been a recent field trials that has demonstrated the benefit of such measures. A study at Smøla in Norway (May et al. 2020) found a significant reduction in White-tailed Eagle collisions following painting of one of the three rotor blades black. The annual bird fatality rate was reduced at the turbines with a painted blade by over 70%, and no white-tailed eagle carcasses at all were recorded after painting.
- **Deterrents** – bioacoustic or other scaring devices might have the potential to deter birds from flying in close proximity to wind turbines. Smith et al. (2011) showed that use of an acoustic deterrent (Long Range Acoustic Device) elicited strong reactions from 60% of Griffon Vultures but its efficacy depended on the distance from the bird, altitude and flock size. Deterrents also have the potential to be activated by automated real-time surveillance systems as an initial mitigation step and prior to blade curtailment (May et al., 2012; Smith et al. 2011). A possible problem with this mitigation though, as noted by Marques et al. (2014), is that the deterrent may have an unpredictable effect on the flight path and may not always deflect the bird in the desired direction.
- **Compensation** – these include measures to deliver a wider benefit to the populations that could be affected by the wind farm, including habitat expansion, creation or restoration, predator control and supplementary feeding.

3.6. Indirect effects: disturbance

Disturbance could potentially affect a rather greater area than direct habitat loss. Disturbance itself can result from several factors associated with the wind farm, including operational noise, the visibility of tall structures and increased human presence through maintenance activities, as well as the construction works

prior to operation. Published studies have only been able to look at all of these factors acting together, so it is not possible to separate out the different aspects of disturbance when assessing the potential effects.

The maximum distance that wind turbines have been shown to affect terrestrial birds is 800m (Percival 2005; Pearce-Higgins et al. 2009), though most reliable studies have not reported effects further than 600m from turbines (Drewitt and Langston 2006) and displacement is usually partial rather than complete (i.e. a reduction in use not complete exclusion). Displacement has generally been more widely reported and over a greater distance outside the breeding season.

Several of the studies referred to above (e.g. Walker et al. 2005, Percival et al. 2009a, Percival et al. 2009b, Whitfield et al. 2006) have noted some displacement of raptors from a zone around wind turbines. This has typically been reported over a distance of 1-200m of turbines, though Fielding and Haworth (2013) found evidence of displacement of golden eagle up to 500m. Displacement effects have also been reported for White-tailed Eagles at Smøla, in Norway (May et al. 2013). Campedelli et al (2013) found significant reductions in a range of raptor species at a wind farm in Italy. Though disturbance would reduce collision risk it does mean that the development of a wind farm could result in effective loss of habitat if birds are dissuaded from using the area in proximity to turbines. Any impact on the population would be dependent on importance of that area from which displaced and the availability of alternative areas, but any assessment should take into account the possibility of such small-scale displacement.

The most effective way to mitigate any such losses would be through the provision of alternative resources nearby (but outside the potential impact zone of the wind farm). Such measures have been successfully implemented at several wind farms, including for golden eagles (Walker et al. 2005), and have been agreed (though not yet implemented) for Verreux's Eagle in South Africa (for the Witberg wind farm).

Disturbance is likely to be highest during construction owing to the activities being carried out. Pearce-Higgins et al. (2012) found that Red Grouse, Snipe and Curlew densities all declined on wind farms during construction, whilst densities of skylark and stonechat increased. Construction also involves the presence of work personnel on site which itself can be an important source of potential disturbance. Even at this time displacement from a zone around the wind turbines is likely to be only partial. Pearce-Higgins et al. (2012) for example reported decreases in curlew density during construction of 40% and snipe by 53%.

A further potential disturbance effect could be disruption to important flight lines (barrier effect; Percival 2005, Drewitt and Langston 2006). Birds may see the wind farm and change their route to fly around (rather than through) it. This would reduce the risk of collision but could possibly have other effects, for example potentially making important feeding areas less attractive (by acting as a barrier to the birds reaching them) and (if diversions were of a sufficient scale) resulting in increased energy consumption.

The distance needed to divert around the Fronteer Wind Farm would be relatively small and would not be expected to act as a major barrier to movements (and the vantage point surveys have not shown any important flight routes through the site). Accordingly, the ecological consequences of any such changes in flight lines would be of negligible magnitude and not significant.

3.7. Effects of the Decommissioning Phase

The ornithological effects that are likely to occur during decommissioning will be similar to those during construction, though given the reduced time required, and the presence of existing infrastructure, they would be of a lower magnitude. Significant effects are not likely but precautionary mitigation measures will be implemented to ensure this, as detailed below.

3.8. Potential Effects of Power lines on Birds

In addition to the potential effects of the proposed Fronteer Wind Farm (above) on birds, a power line will be constructed to connect the electricity generated to the national grid. The construction of the power line

will add extra impacts on birds, these can include the disturbance of birds during construction activities and the loss of breeding or feeding habitat.

During the operational phase birds can be at risk of collision with power line conductors or get electrocuted on pole structures (Percival 2005, Drewitt and Langston 2006, Gove et al. 2013).

3.9. Direct effects: loss of habitat

The construction of the power lines will result in some disturbance and habitat loss. New service roads/tracks to be constructed will also have a disturbance and habitat destruction impact.

3.10. Direct effects: from operating power lines

Overhead power lines pose a collision and an electrocution threat to certain bird species (depending on the pole top configuration).

Collision with power lines is one of the biggest single threats facing birds in southern Africa (van Rooyen 2004). The most vulnerable groups are bustards, storks, cranes and various species of water birds. These species are mostly heavy-bodied birds with limited manoeuvrability, which makes it more difficult to take the necessary evasive action to avoid colliding with power lines (van Rooyen 2004, Anderson 2001). Many of these collision-sensitive species are considered threatened in southern Africa. The Red List species vulnerable to power line collisions are generally long living, slow reproducing species under natural conditions.

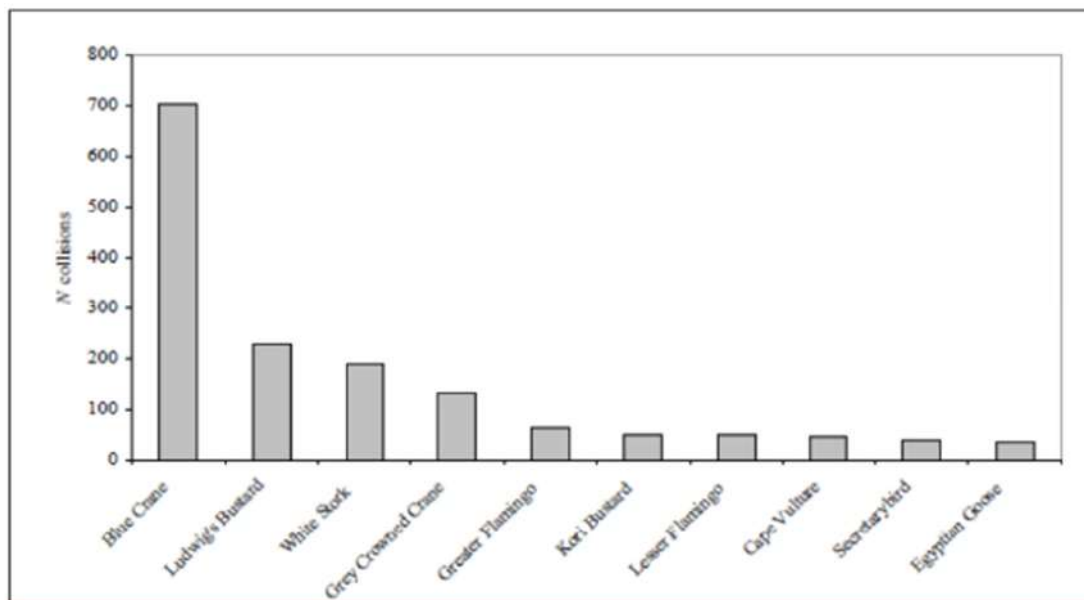


Figure i. The top ten power line collision prone bird species in South Africa, in terms of reported incidents contained in the Eskom/EWT Strategic Partnership central incident register 1996 - 2008 (Jenkins et al. 2010)

Electrocution can occur when a bird perches 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 larger bird species (such as eagles and vultures) are most affected since they are most capable of bridging critical clearances on hardware.

3.11. Potential Collisions and Electrocutions at Fronteer Wind Farm

Several of the bird species of Special Conservation Concern that occur in the Fronteer study area will be at risk from the power lines. This includes:

- collisions occur when birds collide with power line conductors or earth wires; Blue Crane, Ludwig's Bustard, Denham's Bustard, Southern Black Korhaan and Secretarybird (Table 3, 4 and 5). These species are all 'walking-while-feeding' species, and mainly lack the ability to perch, therefore are more prone to collide with lines or wires (van Rooyen 2004).
- electrocutions occur when birds perch on powerline poles or structures, these include Martial Eagle, Verreaux's Eagle and Lanner Falcon (Table 3, 4 and 5) (van Rooyen 2004), these species regularly perch on powerline poles.

4. POLICY AND LEGISLATION

The legislation relevant to this specialist field and development include the following:

- National Environmental Management Act, No 107 of 1998 (NEMA). South Africa's framework environmental act was established to provide for co-operative, environmental governance by establishing principles for decision-making on matters affecting the environment, institutions that will promote co-operative governance and procedures for co-ordinating environmental functions exercised by organs of state; and to provide for matters connected therewith. Through the Environmental Impact Assessment (EIA) Regulations (2014, as amended), the act requires certain activities and developments to undergo an EIA process. Certain specialist studies are required, depending on the development type, scale and location. In the case of a wind farm development, and avifaunal specialist study is required.
- The Convention on Biological Diversity (CBD): dedicated to promoting sustainable development. The Convention recognizes that biological diversity is about more than plants, animals and micro-organisms and their ecosystems – it is about people and our need for food security, medicines, fresh air and water, shelter, and a clean and healthy environment in which to live. It is an international convention signed by 150 leaders at the Rio 1992 Earth Summit. South Africa is a signatory to this convention and should therefore abide by its' principles.
- An important principle encompassed by the CBD is the precautionary principle which essentially states that where serious threats to the environment exist, lack of full scientific certainty should not be used as a reason for delaying management of these risks. The burden of proof that the impact will not occur lies with the proponent of the activity posing the threat.
- The Convention on the Conservation of Migratory Species of Wild Animals (also known as CMS or Bonn Convention): aims to conserve terrestrial, aquatic and avian migratory species throughout their range. It is an intergovernmental treaty, concluded under the aegis of the United Nations Environment Programme, concerned with the conservation of wildlife and habitats on a global scale. Since the Convention's entry into force, its membership has grown steadily to include 117 (as of 1 June 2012) Parties from Africa, Central and South America, Asia, Europe and Oceania. South Africa is a signatory to this convention.
- The Agreement on the Conservation of African-Eurasian Migratory Water birds (AEWA): is the largest of its kind developed so far under the CMS. The AEWA covers 255 species of birds ecologically dependent on wetlands for at least part of their annual cycle, including many species of divers, grebes, pelicans, cormorants, herons, storks, rails, ibises, spoonbills, flamingos, ducks, swans, geese, cranes, waders, gulls, terns, tropic birds, auks, frigate birds and even the South African penguin. The agreement covers 119 countries and the European Union (EU) from Europe, parts of Asia and Canada, the Middle East and Africa.
- The National Environmental Management – Biodiversity Act - Threatened or Protected Species list (TOPS).
- The Provincial Nature Conservation Ordinance (Nature Conservation Ordinance 19 of 1974) identifies very few bird species as endangered, none of which are relevant to this study. Protected status is accorded to all wild bird species, except for a list of approximately 12 small passerine species, all corvids (crows and ravens) and all Mousebirds.
- The Civil Aviation Authority has certain requirements regarding the visibility of wind turbines to aircraft. It is our understanding that these may preclude certain mitigation measures for bird collisions, such as the painting of turbine blades in different colours.

5. LIMITATIONS AND ASSUMPTIONS

The presence of the observers on site will have an effect on the birds. For example during walked transects, certain bird species will flush more easily than others (and therefore be detected), certain species may sit undetected, certain species may flee, and others may be inquisitive and approach the observers. Likewise with the vantage point counts, observers sitting in position for four hours at a time will likely affect bird flight activity. Some species may avoid the vantage point position because there are people there, and others may approach out of curiosity. In almost all data collection methods larger birds will be more easily detected, and their position in the landscape more easily estimated. This is particularly relevant at the vantage points where a large eagle may be visible several kilometres away, but a smaller Rock Kestrel will be detectable over a smaller distance. A particularly important challenge is that of estimating the height at which birds fly above the ground where there were no reference points against which to judge. For this reason, the flight height data were treated cautiously in this report, and collision modelling has been based on conservative estimates of the percentage of birds flying at rotor height.

Spotting and identifying birds whilst walking is a significant challenge, particularly when only fleeting glimpses of birds are obtained. As such, there is variability between observers' ability and hence the data obtained. The above data is therefore by necessity subjective to some extent. In order to control for this subjectivity, the same team of observers was used for all the baseline surveys. Despite this subjectivity, and a number of assumptions that line transects rely on (for more details see Bibby et al, 2000), this field method returns the greatest amount of data per unit effort (Bibby et al, 2000) and was therefore deemed appropriate for the purposes of this programme. Likewise, in an attempt to maximise the returns from available resources, the walked transects were located close to each Vantage Point. This systematic selection may result in some as yet unknown bias in the data but it has numerous logistical benefits.

Limitations in relation to BLSA guidance included use of a single year's baseline and less than the full recommended 72 hours' surveys recommended in some of the more sensitive areas are discussed in section 2.2 above. It is considered that the extensive nature of the data collection from a large number of VPs, in combination with spatial modelling of these data, has provided a robust baseline for the assessment.

There is still limited information available on the environmental effects of wind energy facilities in South Africa, though a review published by Ralston-Paton et al. in 2017 using data from eight wind farms has been recently updated to use data from 20 wind farms (Perold et al. 2020), and overall collision rates appear similar to those in the northern hemisphere. Estimates of impacts are therefore also based on knowledge gained internationally, applied with caution to local species and conditions.

The collision risk assessment has also been limited by the lack of availability of quantitative comparisons of bird flight activity and collision rates on the priority species at other wind farm sites, but has adopted a precautionary approach, making reasonable worst-case assumptions but also drawing on empirical evidence from similar species elsewhere. As a result, it is considered that the predicted collision risks are unlikely to be exceeded.

6. DESCRIPTION OF HABITAT

6.1. Biomes and Vegetation types

The climate of the Fronteer Wind Farm site is semi-arid and the site is predominantly two natural vegetation types (Mucina and Rutherford, 2006), see Figure 1:

- 'Albany Thicket' (with AT8 Kowie Thicket and AT10 Great Fish Noorsveld); and
- 'Nama-Karoo' Lower Karoo NKI4 Albany broken veld, dominated by small shrubs (bossies).

Thicket (bush) vegetation covers about 70% of the site and mainly hosts small bird species (bush birds) while the open Karoo veld covers the remainder and attract mainly large terrestrial bird species. No large agricultural croplands occur on site therefore the Fronteer site is relatively pristine.

However, the Thicket vegetation occurs in varying states of degradation (openness) likely because of over-grazing by livestock. When the bush is degraded due to over-grazing, the open areas get covered with Karoo bossies (see Figure 3b), a phenomenon that is not clearly understood by local botanists (Becker et al. 2015). During periods/seasons of good rain the Karoo shrub areas gets overgrown by grass while during times of drought the grass disappears.



Figure 3b. Shows the contrast between Thicket bushveld and Karoo shrub vegetation (the open patches between the trees).

6.2. Bird microhabitats

To determine which bird species are likely to occur on the proposed Fronteer Wind Farm development site, it is important to understand the habitats available to birds at a smaller spatial scale, i.e. micro-habitats. Micro-habitats are shaped by factors other than vegetation, such as topography, land use, food sources and man-made factors as mentioned above. Aerial photographs, satellite imagery and a vegetation type layer supplemented the field work of the bird monitoring team and has been used to identify the following micro-habitats on the proposed development site:

Albany Thicket vegetation

Most of the Choe Eastern block, including the Fronteer Wind Farm, falls within the Albany Subtropical Thicket (Valley bushveld) biome (Mucina and Rutherford 2006), particularly associated with slopes of the ridges and hills. These areas generally coincide with the Kowie thicket vegetation type (which in pristine vegetation can reach 6-8m tall). On the southern slopes (being more moist and shadier) the Thicket is more dense (close canopy) while on the northern slopes (being more sunny and more arid) the Thicket is less dense, having more a savanna pattern of cover. Small bush birds inhabit the Thicket.

Nama Karoo veld

Nama-Karoo biome (Mucina and Rutherford 2006) with Karoo shrubland (bossieveld) vegetation is a complex mix of dwarf shrub (30-40cm) and a grass dominated vegetation type. This is intertwined with Thicket vegetation especially in degraded areas. It is also attractive to Large Terrestrial birds that forage in this Bossieveld.

Rivers and Drainage Lines

No permanent rivers occur in the Fronteer Wind Farm Site. There are many dry drainage lines that may not always carry water, but these features are dominated by dense *Acacia karroo* and generally have a higher abundance of small bird life than the surrounding vegetation. These drainage lines are flyways followed by many bird species on daily foraging trips.

Farm Dams

Dams are important attractions for various bird species in the Karoo landscape, and are often the only source of water during the dry season in the area. No large dams were present in the Fronteer Wind Farm site but there were many small dams which attracted various waterfowl, herons and African Spoonbill. African Fish Eagle was often seen at these dams while Blue Cranes used small farm dams as night roost sites.

Cliffs and rocky areas

Cliffs in deep eroded draining kloofs (small valleys) below ridges occur in the proposed development site, especially in the southern areas of the Eastern block. These cliffs and the surrounding bush with tall trees, especially on south-facing slopes, are important breeding areas for various raptors, e.g. Rock Kestrel, Lanner falcon, African Harrier-Hawk, Jackal Buzzard, Martial Eagle and Verreaux's Eagle. Rock Dassies frequent rocky areas, which are the main prey of Verreaux's Eagles.

Natural Forest

Although no forests occur within the Fronteer site, some small clumps of Yellowwood trees occur. One such clump has an active Crowned Eagle nest (though outside the Fronteer site, on the East block Road transect route). Some deep south-draining kloofs in the study area have small patches with tall trees, this is where, for example, Martial Eagles nest.

Ridge slopes and Thermal areas

Many raptors use the wind blowing over the slopes of ridges and hills (slope soaring) to gain lift and to hunt. Raptor abundance can be affected by wind direction and strength, for example Verreaux's Eagles may be seen more frequently in stronger winds.

Thermal conditions vary between habitats. On hotter days bare ground heats faster than more vegetated ground, causing the rising of hot air (thermal soaring), which can attract large raptors such as Martial Eagles.

Power lines

One large 132kV (single steel pole) power line crosses the proposed Fronteer Wind Farm site from Makhanda to the west. Raptors use these poles as hunting perches.

Farmsteads and livestock kraals

Farmsteads are disturbed areas surrounding farmhouses or areas of human activity, while feeding kraals are areas where livestock gather for food, shelter and water provided by the farmers. These habitats are frequented by a high diversity of small passerine birds. Spotted eagle-owl and Barn Owl often breed around homesteads.

Stands of Alien Trees

Stands of alien trees such as blue gums occur scattered around the landscape, mainly near farmsteads, rivers and drainage lines. These are utilised as roosts and/or perches by raptors while African Fish Eagle often have nests in such clumps.

Bhisho thornveld

The 'Bhisho Thornveld' vegetation type (whether disturbed or natural, depending on land use practises), occurs on the southern end outside the Fronteer Wind Farm development site. These areas have low vegetation cover and may be important for various priority species.

Fynbos vegetation

The topmost areas of ridges and hills have rocky patches and sometimes Fynbos vegetation with mainly Renosterbos, but Proteas were often present.

7. RESULTS OF THE PRE-CONSTRUCTION BIRD MONITORING (JUNE 2019 – AUGUST 2020)

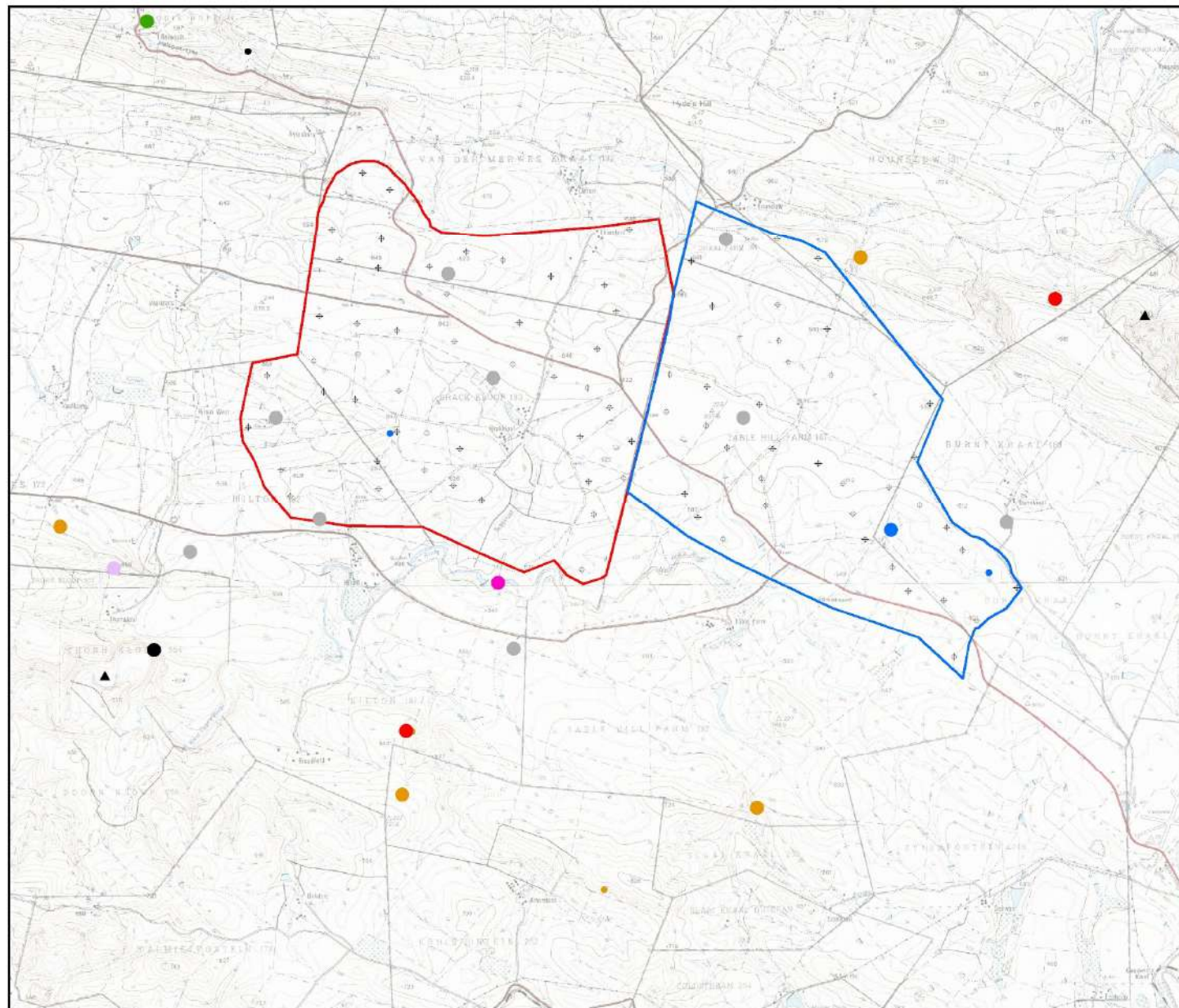
7.1. Raptor Breeding Locations (Choje East block)

This section of the report provides information on the raptor breeding locations across the whole of the Choje Eastern block (to provide a wider context), then focusses on the nest sites that are located in the areas that could be affected by the Fronteer wind farm.

Three Martial Eagle (one to the west 19km from the wind farm site, one 5.9km south-west and one 2.7km north-east of the Fronteer site), two Verreaux's Eagle (one confirmed location 9km south-west from the Fronteer site and one potential territory 8km north-west), three Crowned Eagle (at Palmietfontein (active), Hellsport (one historic site) and at Smoerfontein (a potential site), all relatively distant (10-18km) from Fronteer) and one African Fish-eagle (3.4km south-west from Fronteer) territories were confirmed in the Eastern Block and its surrounds during the raptor surveys.

Other breeding locations identified included two Secretarybirds and three Jackal Buzzards.

The locations of all these breeding locations in proximity to the Fronteer site are shown in Figure 4.



Frontier Proposed Wind Farm

FIGURE 4

Eastern Block: Raptor Nest Locations 2019-2020

KEY:

- Choje East turbines EIA
- Wind Garden Site Boundary
- Frontier Site Boundary

Species (large=2020, small=2019)

- African Harrier-hawk
- Crowned Eagle
- Fish Eagle
- Jackal Buzzard
- Martial Eagle
- Pale Chanting-goshawk
- Secretarybird
- Verreaux's Eagle
- SEA avian sensitivity (Lanner)



0 0.4 0.8 1.6 2.4 3.2 Kilometres

UNIT: N/A

SCALE: N/A

EC-2020-1

SCALE - 1:60,000 @ A3

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Table 3. Flight rates at rotor height and the TOTAL flights of target species through the proposed Fronteer wind farm, June 2019 - August 2020 and their conservation status (IUCN and South Africa Red Data Book Listings) ['- = no records in that month].

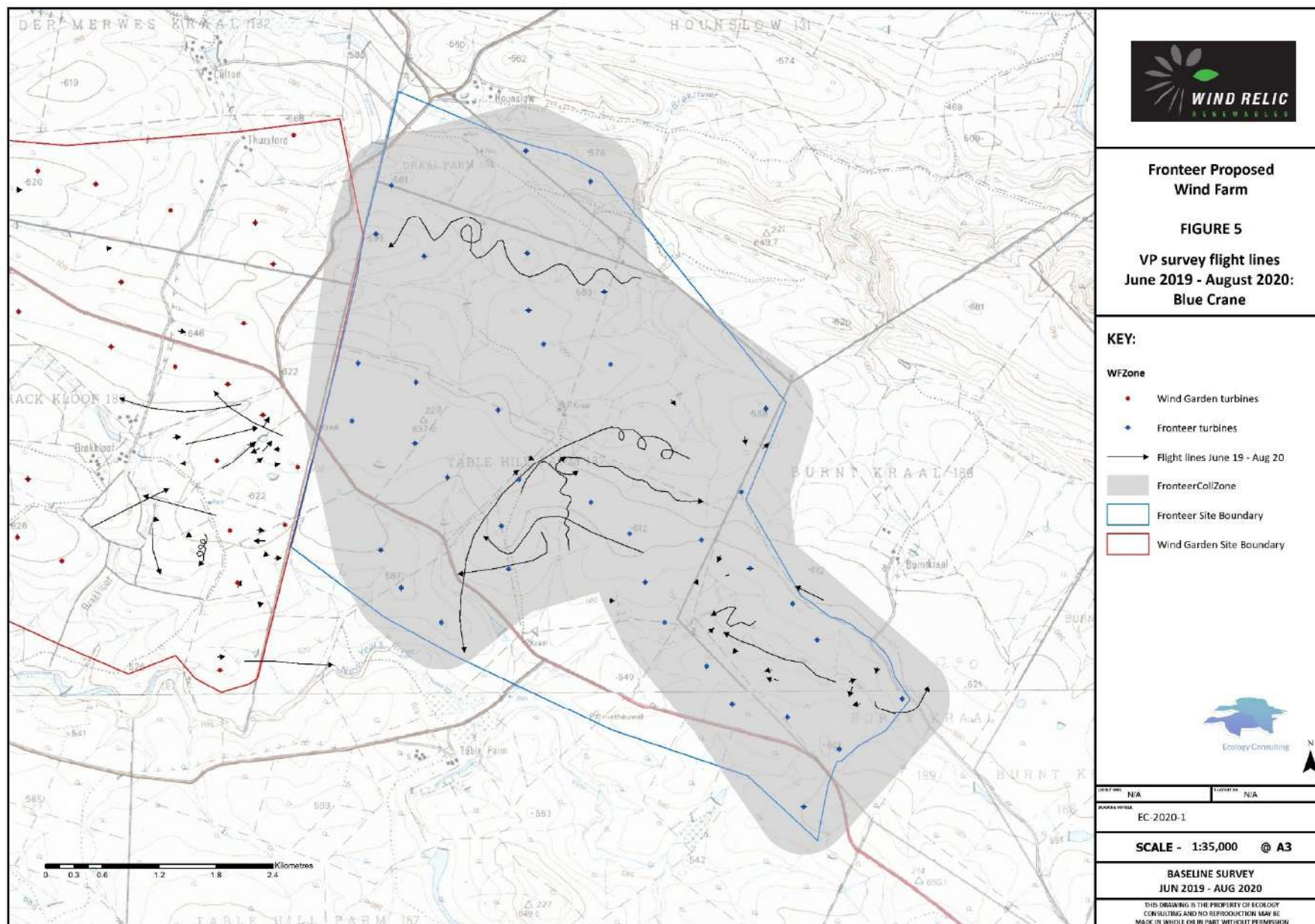
Species	IUCN	SA	Jun 19	Jul	Aug	Sep	Oct	Nov	Dec 19	Jan 20	Feb	Mar	May	Jun	Jul	Aug 20	TOTAL FLIGHTS @ ROTOR HT	TOTAL FLIGHTS OBSERVED
Egyptian goose	LC		-	-	-	-	-	-	-	-	-	-	0.036	-	-	-	1	1
South African shelduck	LC		-	-	-	0.042	-	-	-	-	-	-	0.036	-	-	-	2	2
Blue crane	VU	NT	-	-	-	0.083	0.042	0.417	-	0.083	-	0.083	0.036	-	-	-	18	25
Ludwig's bustard	EN	EN	-	0.150	-	0.042	-	-	-	-	-	-	-	-	-	-	4	6
Denham's bustard	NT	VU	0.048	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1
Southern black bustard	VU	VU	0.095	-	-	-	0.042	-	0.042	-	0.042	-	-	-	-	-	5	27
Black-headed heron	LC		-	-	0.042	-	-	-	-	-	-	-	-	-	-	-	1	2
Black-winged kite	LC		-	-	-	-	-	0.042	-	-	-	-	-	-	-	-	1	1
Martial eagle	VU	EN	0.048	-	0.042	-	-	0.042	-	-	-	-	0.036	-	-	-	4	5
Verreaux's eagle	LC	VU	-	0.050	-	-	-	-	-	-	-	-	-	-	-	-	1	1
Booted eagle	LC		-	-	-	-	-	0.208	-	-	-	-	-	-	-	-	5	6
Pale chanting-goshawk	LC		0.095	-	0.042	0.042	0.125	0.083	-	0.042	0.083	0.042	0.071	0.083	-	0.250	19	46
Jackal buzzard	LC		0.048	0.050	-	-	-	0.083	-	0.167	-	-	-	-	-	-	8	8
Eurasian buzzard	LC		-	-	-	-	-	0.042	-	-	-	-	-	-	-	-	1	2
Common kestrel	LC		0.048	-	-	0.042	-	0.125	0.167	-	-	-	-	-	-	-	9	17
Lanner falcon	LC	VU	0.095	-	-	-	-	-	-	-	-	-	-	-	-	-	2	3

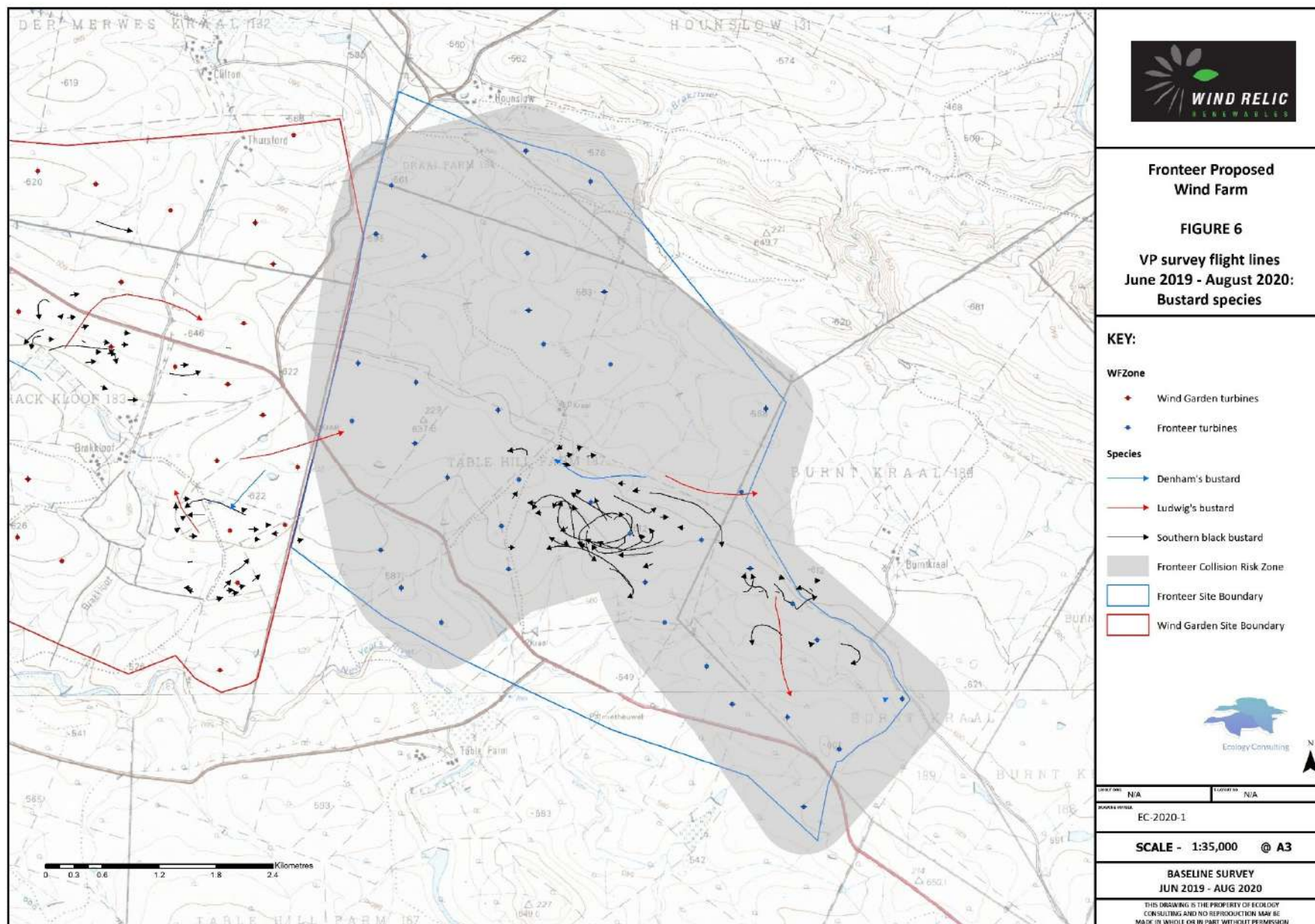
Note: LC = least concern, NT = near threatened, VU = vulnerable, EN = endangered. Species in bold were taken forward for collision risk modelling as species of conservation concern/vulnerable species at risk of collision.

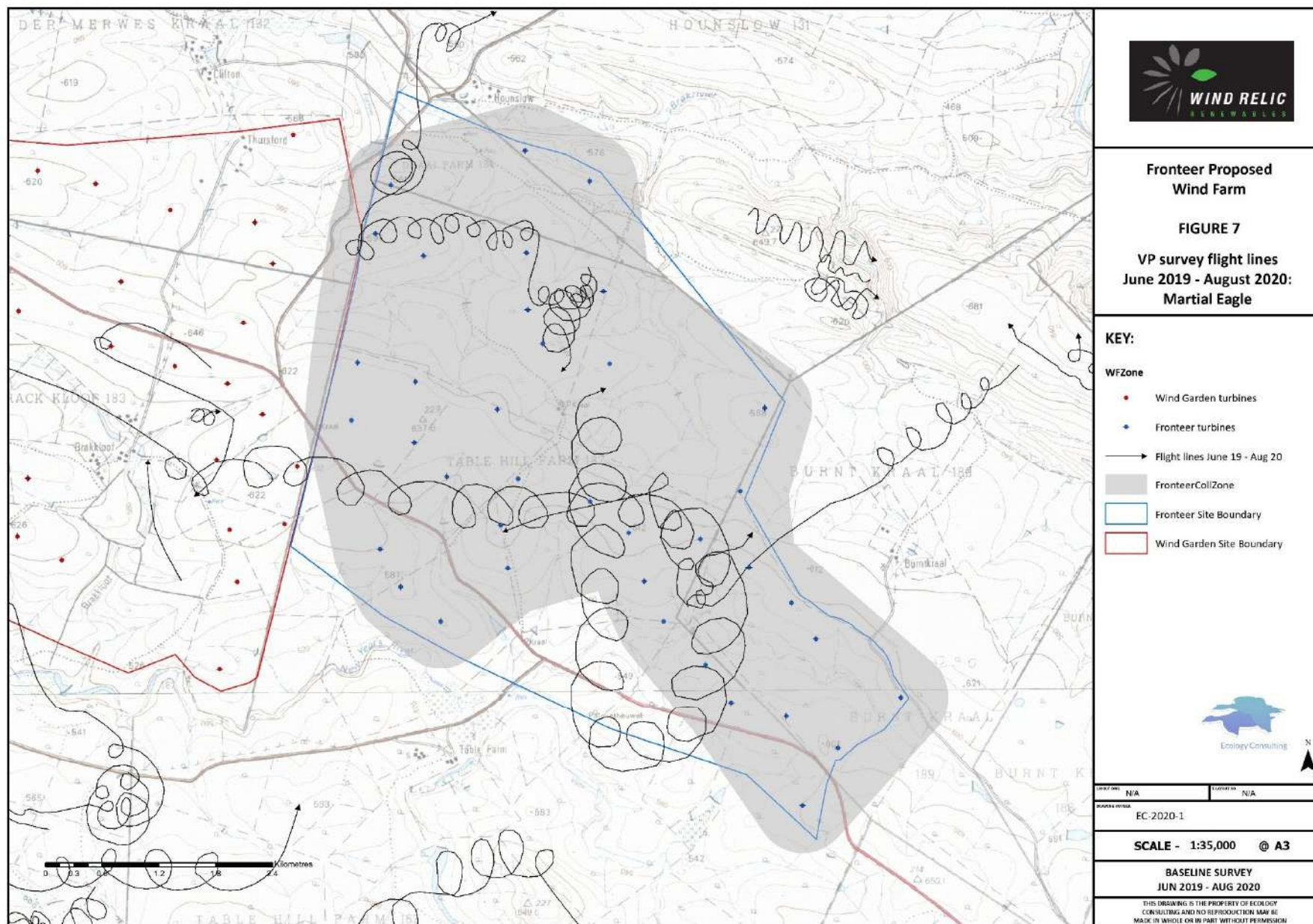
7.2. Vantage Point Survey Results

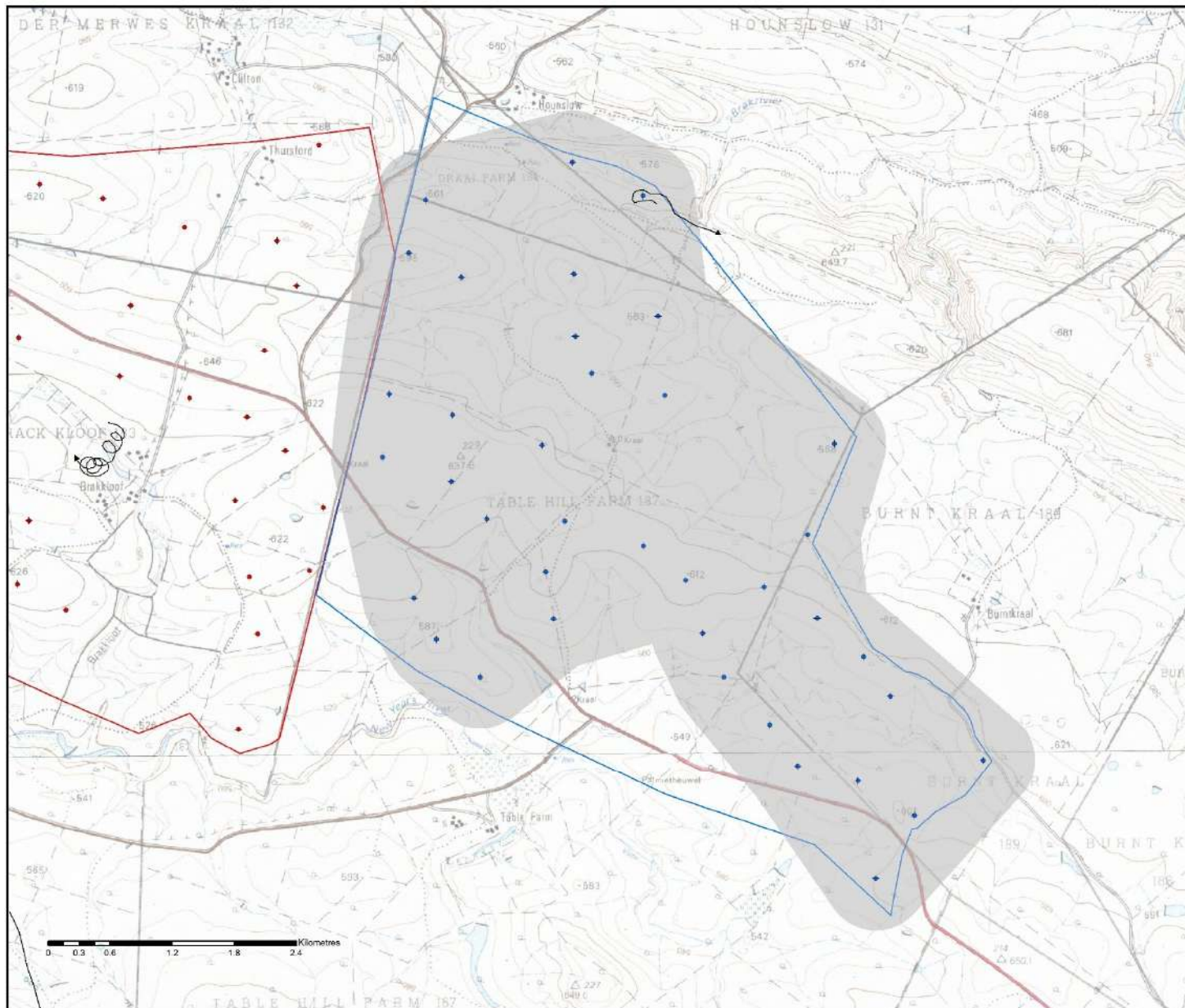
The flight rates at rotor height recorded during the VP surveys over the Frontier site are summarised in Table 3. This Table gives the mean number of flights recorded per hour observation for each month from June 2019 through to August 2020. The Table also gives the conservation status of each species (its IUCN 2019 and South Africa Red Data Book Listings), the total number of flights observed, and the percentage of those flights that were recorded at rotor height (taken for the purposes of this assessment conservatively as 35-250m above ground, to allow for errors in flight height estimation (the actual rotor height would be 40-200m above ground level)).

The Eastern Block VP surveys, which covered the Frontier Wind Farm, recorded nine species of conservation concern: Blue Crane, Ludwig's Bustard, Denham's Bustard, Southern Black Korhaan, Secretarybird, Martial Eagle, Verreaux's Eagle, Black Harrier and Lanner Falcon. Flight line maps for these species at risk of collision (i.e. seen flying at rotor height within the Frontier site) are presented in Figures 5-9. The bustard species were more frequent in the northern (more open, flatter) part of the site. No notable concentrations of flight activity of any of these species was noted in this area.









Fronteer Proposed Wind Farm

FIGURE 8
VP survey flight lines
June 2019 - August 2020:
Verreux's Eagle

KEY:

WFZone

- Wind Garden turbines
- ◆ Fronteer turbines
- Flight lines June 19 - Aug 20
- Fronteer CollZone
- Fronteer Site Boundary
- Wind Garden Site Boundary



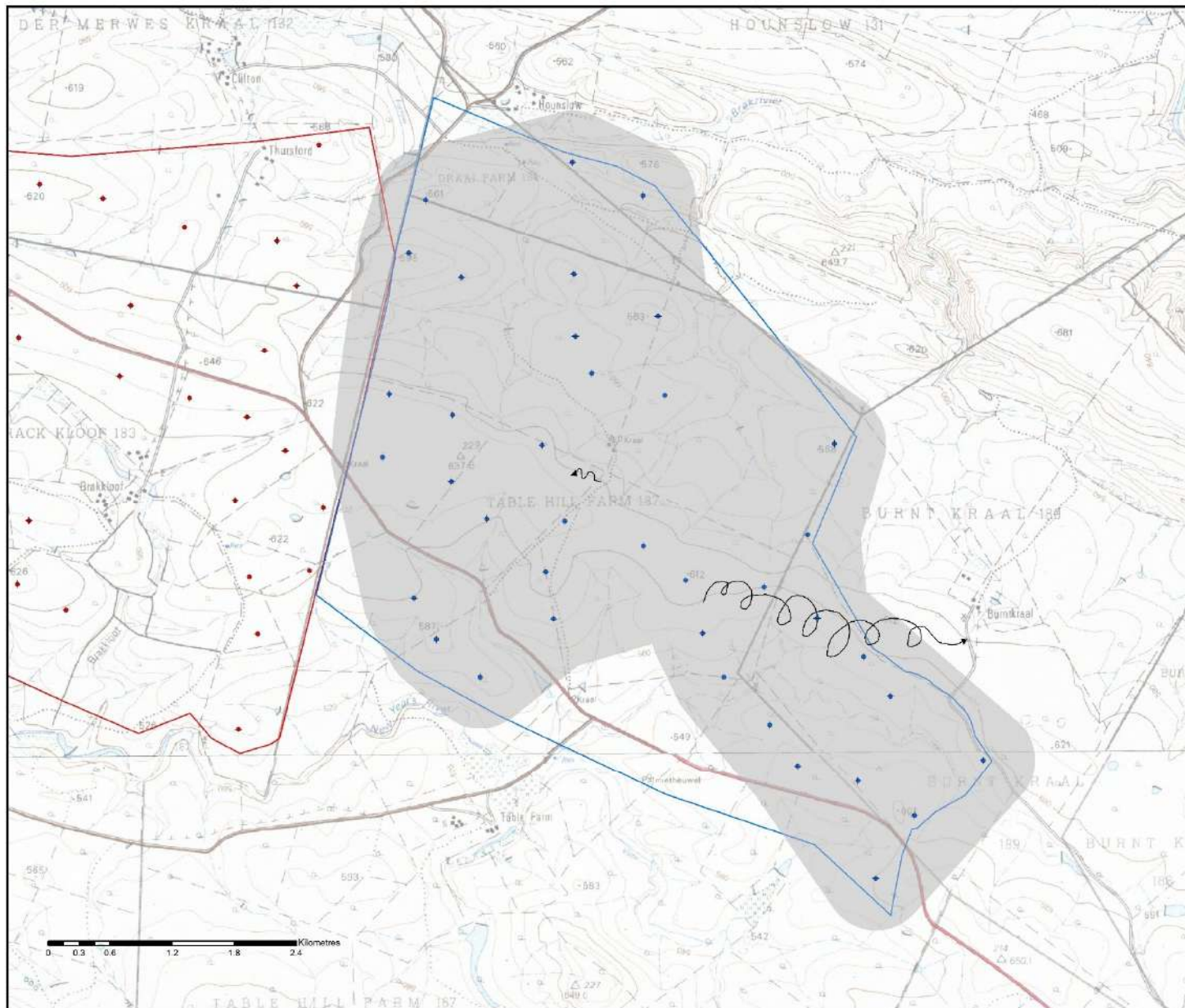
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SCALE - 1:35,000 @ A3

BASELINE SURVEY
JUN 2019 - AUG 2020

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Fronteer Proposed Wind Farm

FIGURE 9
VP survey flight lines
June 2019 - August 2020:
Lanner Falcon

KEY:

WFZone

- Wind Garden turbines
- ◆ Fronteer turbines
- Flight lines June 19 - Aug 20
- FronteerCollZone
- Fronteer Site Boundary
- Wind Garden Site Boundary



DATE: N/A

EC-2020-1

SCALE - 1:35,000 @ A3

BASELINE SURVEY
JUN 2019 - AUG 2020

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7.3. Road Transect/Wetland Survey Results

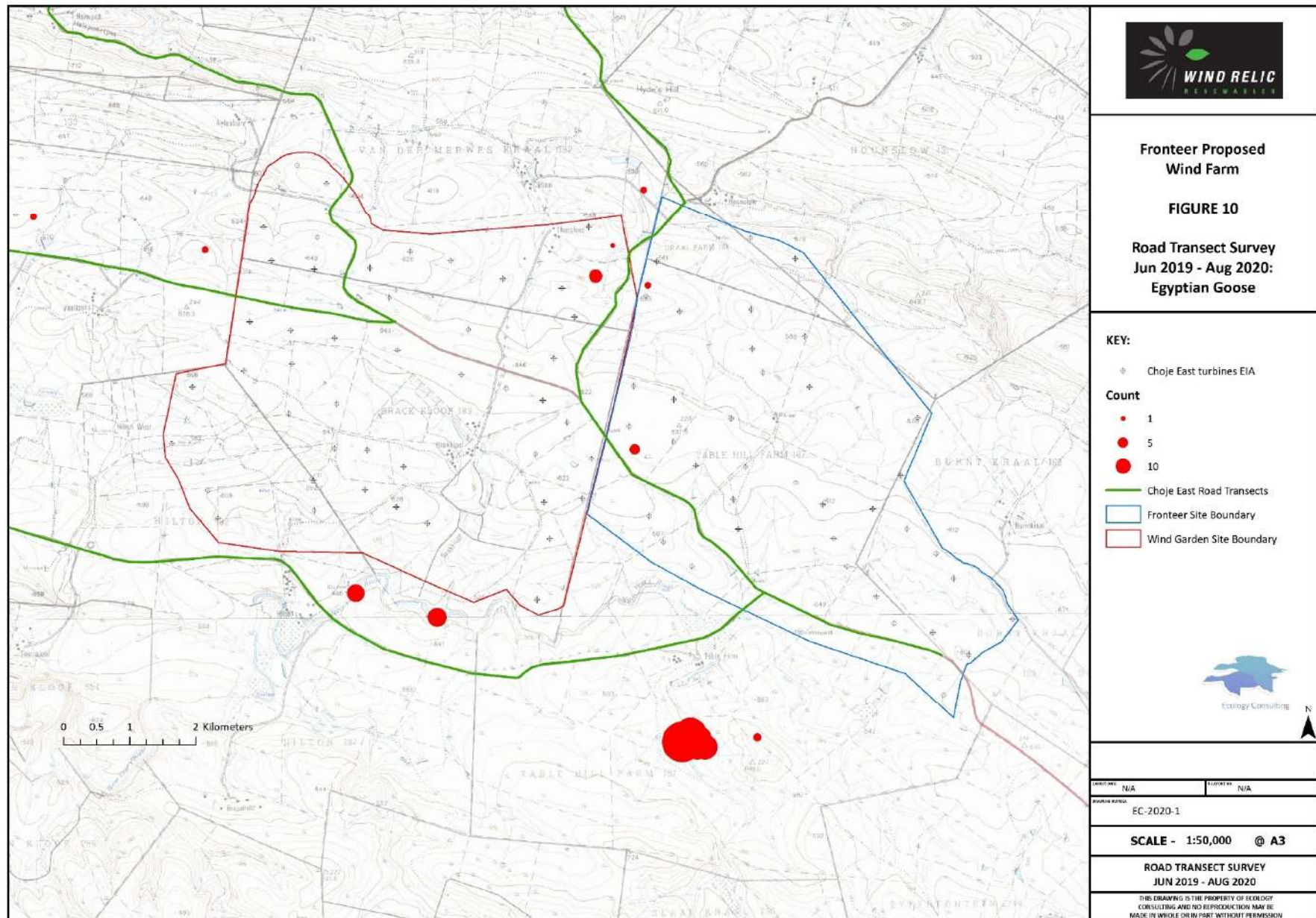
The results of the road transect survey of the Eastern Block during June 2019-August 2020 are summarised in Table 4. This gives the total number of each target species counted each month per km transect within the Fronteer wind farm site (plus a 500m buffer), along with their conservation status (IUCN/South Africa Red Data Book). Generally, only low numbers were recorded during these surveys, even of waterbirds from the various wetland areas that were covered. Nine species of Special Conservation Concern were noted within the whole of the Choje East road transect survey area: Blue Crane, Ludwig's Bustard, Denham's Bustard, Southern Black Korhaan, Martial Eagle, Verreaux's Eagle, African Marsh-harrier, Black Harrier and Lanner Falcon, though the number of records of all of these were low. Three of these were recorded within the Fronteer site: Blue Crane, Southern Black Korhaan and Black Harrier (Table 4).

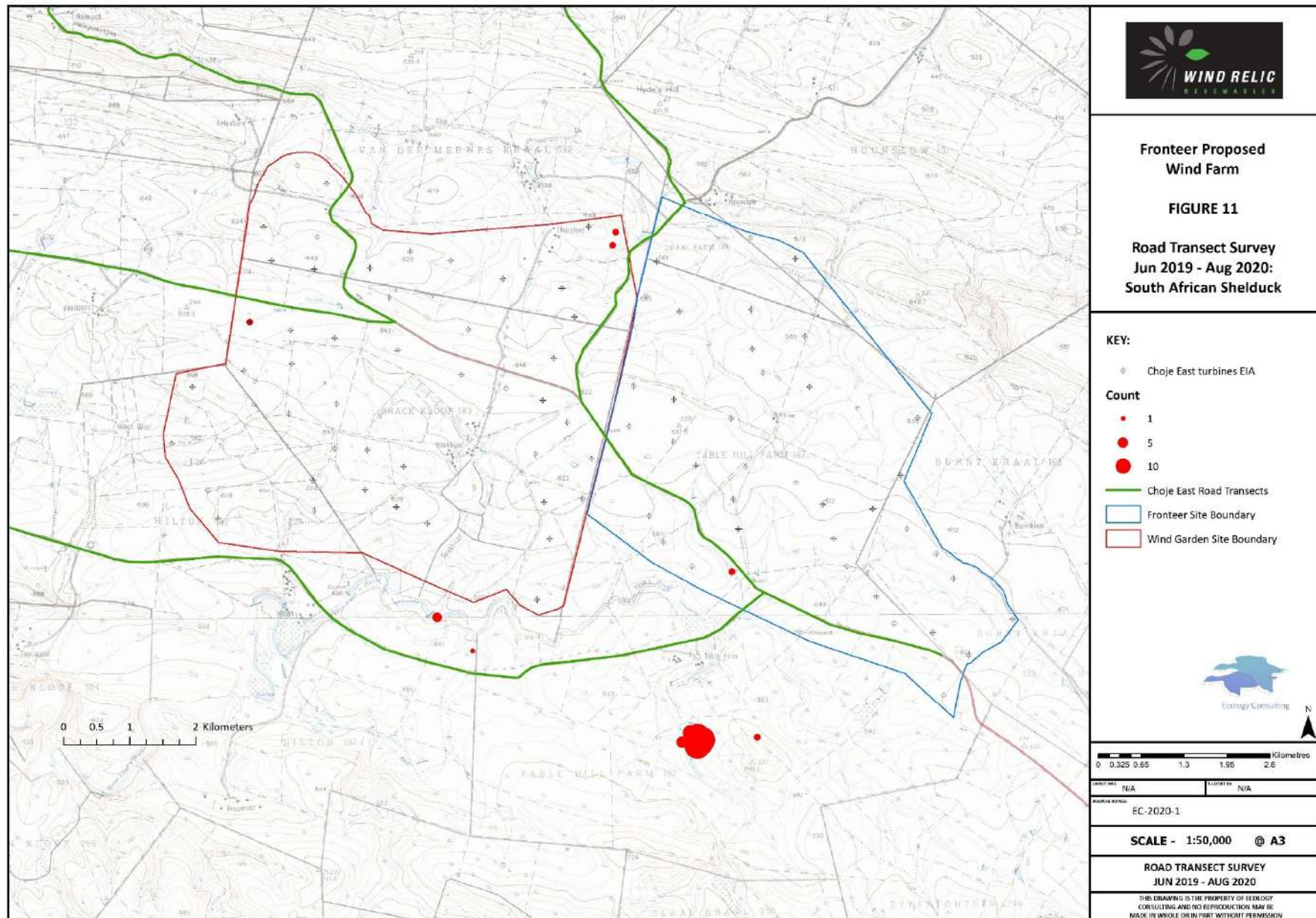
Distributions of the two more common wetland species, Egyptian Goose (Figure 10) and South African Shelduck (Figure 11), are shown to illustrate the main wetland areas (which lie outside the Fronteer site boundary). No important concentrations of wetland birds were recorded within the whole of the Eastern Block, including the Fronteer Wind Farm site.

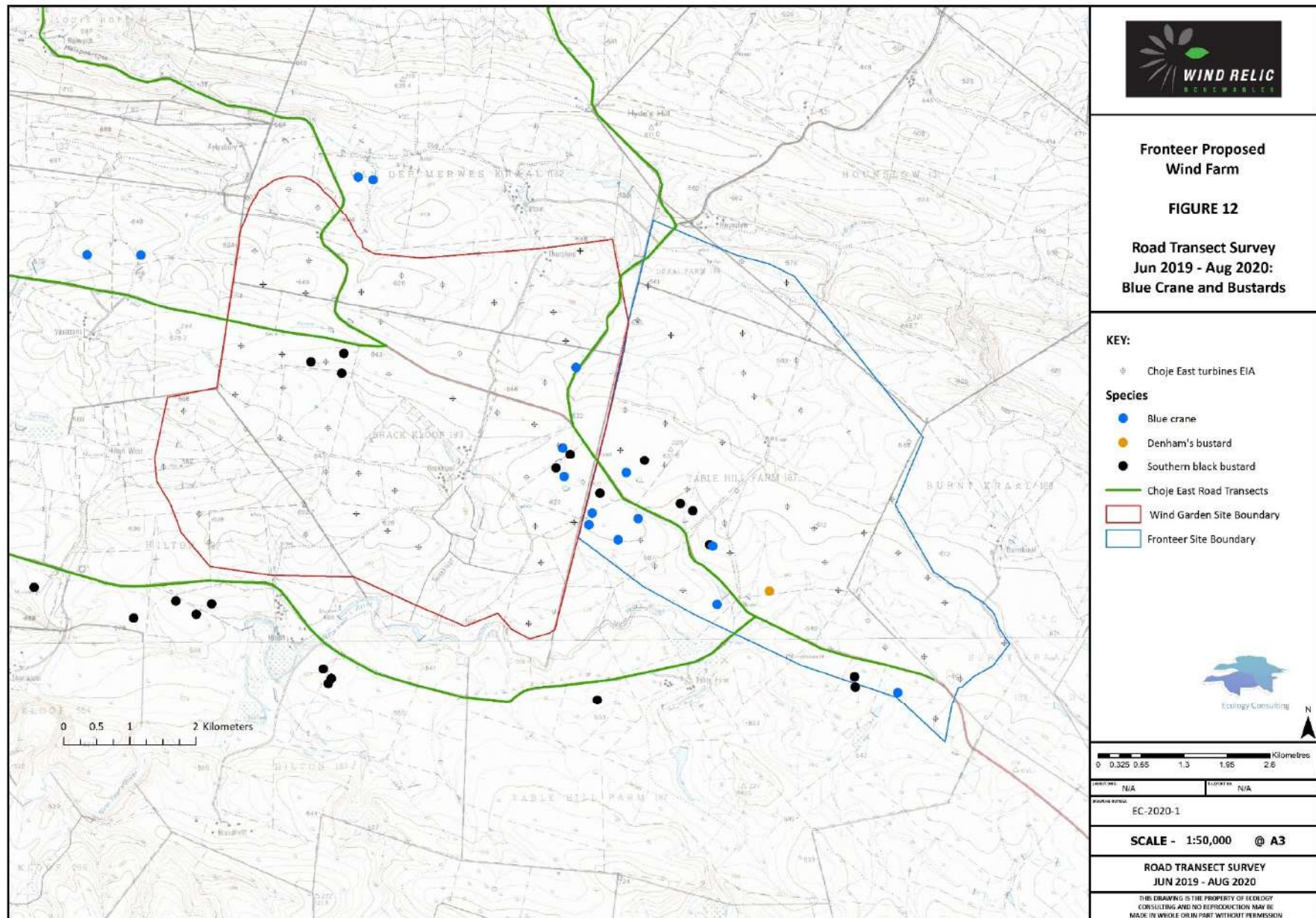
The records of cranes and bustards during these surveys are shown in Figure 12, and other key species in Figure 13. All were widely scattered across the survey area, with no particular concentration identified.

Table 4. Vehicle transect survey counts (birds/km transect) by month in the proposed Fronteer wind farm site (plus 500m buffer), June 2019-August 2020.

Species	IUCN	SA RDB	Jun 2019	Jul	Aug	Sep	Oct	Nov	Dec	Jan 2020	Feb	Mar	May	Jun	Jul	Aug 2020
Egyptian goose	LC		-	-	-	-	-	-	-	-	-	-	-	0.795	-	-
South African shelduck	LC		-	-	0.227	-	-	-	-	-	-	-	-	-	-	-
Cape shoveler	LC		-	-	-	-	-	-	-	-	-	-	-	0.455	-	-
Little grebe	LC		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Blue crane	VU	NT	-	-	-	-	-	0.455	0.227	-	0.227	-	-	0.341	-	0.227
Southern black bustard	VU	VU	-	-	0.114	-	0.227	0.114	0.114	-	-	-	-	-	-	-
Black-headed heron	LC		-	-	-	-	0.114	-	-	-	-	-	-	-	-	0.114
Black-winged stilt	LC		-	-	-	-	-	-	-	-	-	-	-	0.227	-	-
Pale chanting-goshawk	LC		-	-	-	-	-	-	-	0.114	-	-	-	-	-	-
Black harrier	EN	EN	0.114	-	-	-	-	-	-	-	-	-	-	-	-	-







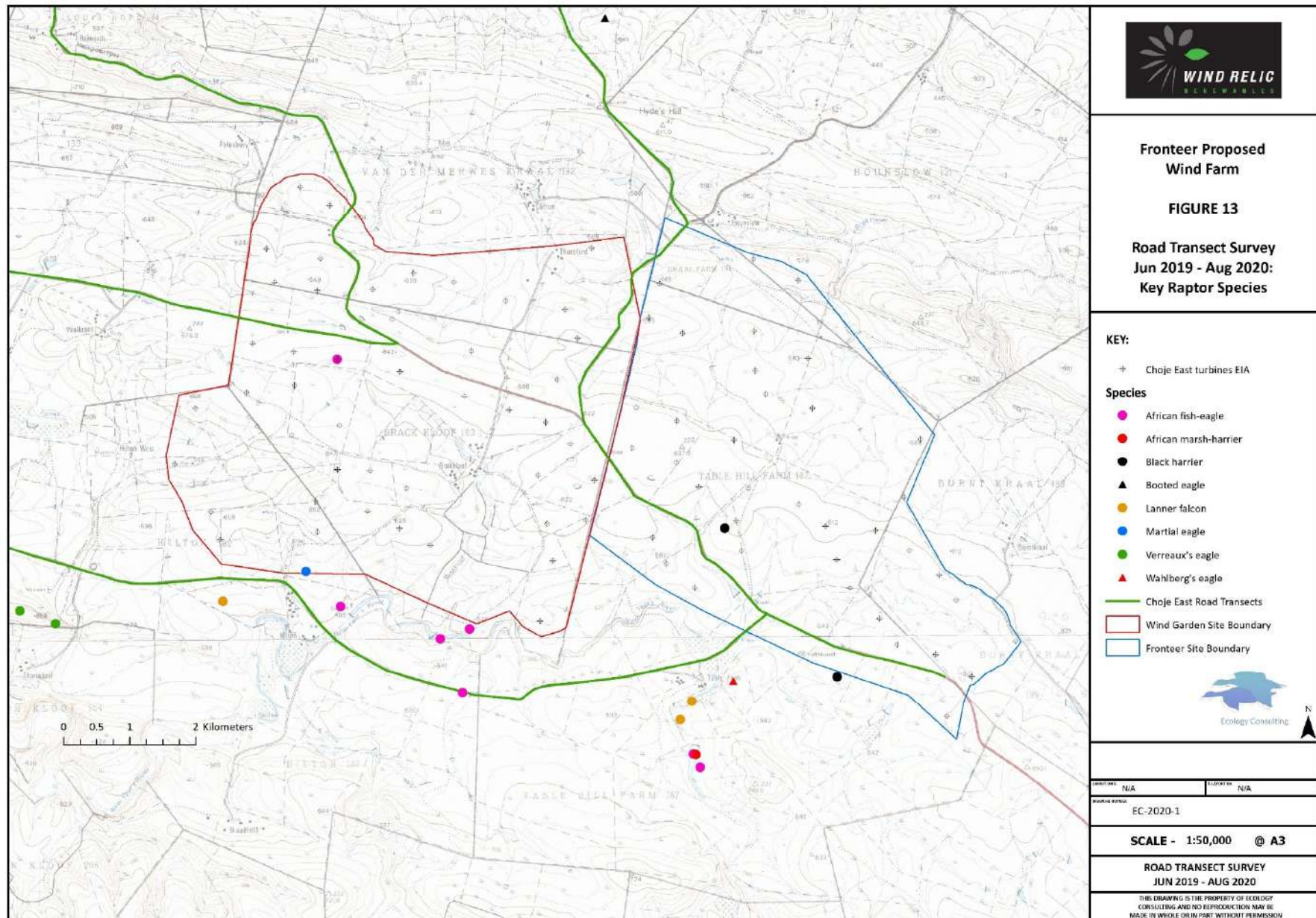


Table 5. Walking transect survey counts (birds per km transect) by month in the Fronteer proposed wind farm site, June 2019 - August 2020.

Species	IUCN	SA RDB	Jun 2019	Jul	Aug	Sep	Oct	Nov	Dec 2019	Jan 2020	Feb	Mar	May	Jun	Jul	Aug 2020
Helmeted guineafowl	LC		-	-	-	-	0.63	-	-	-	-	-	-	-	-	-
Common quail	LC		-	-	-	-	-	-	-	-	-	-	0.63	-	-	-
Red-necked francolin	LC		-	1.88	-	-	-	-	-	-	-	-	-	-	-	-
Rock dove	LC		-	-	-	-	-	0.63	-	-	-	-	-	-	-	-
Ring-necked dove	LC		1.25	2.50	2.50	0.63	1.25	1.25	1.88	-	1.88	-	1.88	1.25	-	-
White-rumped swift	LC		-	-	-	-	-	0.63	-	-	-	-	-	-	-	-
Blue crane	VU	NT	-	-	-	1.25	-	-	-	-	-	-	-	-	-	-
Southern black korhaan	VU	VU	-	-	-	0.63	1.88	0.63	1.88	0.63	0.63	-	-	0.63	-	-
Crowned lapwing	LC		-	-	-	-	-	-	-	-	-	1.25	-	-	-	-
Speckled mousebird	LC		2.50	1.25	-	0.63	1.25	2.50	-	3.13	-	-	-	-	-	-
Red-faced mousebird	LC		5.00	1.88	10.63	5.00	7.50	4.38	-	3.13	-	-	-	4.38	-	-
Common hoopoe	LC		-	-	-	-	-	-	-	-	0.63	-	-	-	-	-
Acacia pied barbet	LC		0.63	-	0.63	1.88	-	0.63	-	0.63	0.63	0.63	-	1.25	-	-
Black-collared barbet	LC		-	-	-	-	-	-	-	0.63	-	-	-	-	-	-
Rufous-necked wryneck	LC		-	-	1.25	0.63	-	1.25	-	-	-	-	0.63	-	-	-
Cardinal woodpecker	LC		-	-	-	-	-	1.25	-	-	-	-	-	-	-	-
Common kestrel	LC		-	-	-	-	-	-	-	-	-	-	-	0.63	-	-
Cape batis	LC		-	-	-	1.25	-	-	-	-	-	-	0.63	-	-	-
Southern tchagra	LC		-	-	0.63	-	-	-	-	-	-	-	-	-	-	-
Southern boubou	LC		-	1.25	-	-	1.25	-	-	-	-	-	-	-	-	-
Bokmakierie	LC		4.38	1.88	2.50	3.13	3.13	6.25	-	1.25	1.25	2.50	3.75	1.25	-	-
Fork-tailed drongo	LC		-	0.63	-	-	-	-	-	-	-	-	-	-	-	-

Species	IUCN	SA RDB	Jun 2019	Jul	Aug	Sep	Oct	Nov	Dec 2019	Jan 2020	Feb	Mar	May	Jun	Jul	Aug 2020
Common fiscal	LC		-	-	-	0.63	1.25	3.13	-	1.25	-	-	-	0.63	-	-
Cape crow	LC		-	1.25	-	-	-	2.50	-	-	-	1.25	-	-	-	-
White-necked raven	LC		1.25	-	-	-	-	-	-	-	-	-	-	-	-	-
Pied crow	LC		2.50	1.25	0.63	1.88	0.63	-	0.63	-	-	1.25	-	2.50	-	-
Southern black tit	LC		-	-	-	-	0.63	-	-	-	-	-	-	-	-	-
Grey tit	LC		-	-	-	-	-	0.63	-	-	-	-	-	-	-	-
Spike-heeled lark	LC		8.75	-	2.50	3.75	1.88	3.75	-	3.13	3.75	3.75	1.88	1.88	-	-
Eastern clapper lark	LC		-	-	-	0.63	1.88	1.88	-	-	3.13	0.63	-	-	-	-
Rufous-naped lark	LC		-	-	-	-	-	-	-	0.63	1.88	-	-	-	-	-
Victorin's warbler	LC		-	0.63	-	-	-	-	-	-	-	-	-	-	-	-
Bar-throated apalis	LC		-	0.63	0.63	0.63	0.63	1.88	-	-	1.25	0.63	1.25	1.88	-	-
Rufous-eared warbler	LC		-	-	-	-	0.63	-	-	1.25	-	-	-	-	-	-
Grey-backed cisticola	LC		0.63	-	1.25	1.88	2.50	2.50	-	-	1.88	1.25	0.63	1.88	-	-
Neddicky	LC		1.25	0.63	0.63	-	1.88	1.88	-	2.50	1.25	0.63	-	0.63	-	-
Karoo prinia	LC		-	0.63	-	-	0.63	2.50	-	-	1.88	0.63	1.25	1.88	-	-
Greater striped swallow	LC		-	-	-	-	0.63	-	-	-	-	-	-	-	-	-
Barn swallow	LC		-	-	-	-	-	1.25	-	-	3.13	3.75	-	-	-	-
Pearl-breasted swallow	LC		-	-	-	2.50	-	-	-	-	-	-	-	-	-	-
Large rock martin	LC		-	-	1.88	-	-	-	-	-	-	-	-	0.63	-	-
Sombre greenbul	LC		-	1.25	-	0.63	-	0.63	-	-	-	-	-	-	-	-
Common bulbul	LC		-	0.63	0.63	0.63	-	1.25	-	-	-	1.25	-	-	-	-
Chestnut-vented warbler	LC		-	-	0.63	-	0.63	0.63	-	1.25	0.63	-	-	1.25	-	-
Red-winged starling	LC		-	-	1.25	1.25	6.88	-	-	-	-	3.13	-	-	-	-

Species	IUCN	SA RDB	Jun 2019	Jul	Aug	Sep	Oct	Nov	Dec 2019	Jan 2020	Feb	Mar	May	Jun	Jul	Aug 2020
African pied starling	LC		-	-	-	-	3.13	-	-	-	-	-	-	-	-	-
Cape starling	LC		1.88	-	3.13	3.13	-	5.00	-	1.25	-	-	-	-	-	-
Karoo scrub-robin	LC		-	0.63	0.63	1.25	1.25	-	-	-	0.63	0.63	1.25	1.88	-	-
Fiscal flycatcher	LC		1.25	3.75	-	-	-	0.63	-	0.63	-	-	0.63	0.63	-	-
Cape robin-chat	LC		-	1.25	-	-	-	-	-	-	-	-	-	-	-	-
Cape rock-thrush	LC		0.63	-	-	-	-	-	-	-	-	-	-	-	-	-
Common stonechat	LC		3.13	-	1.25	1.25	0.63	-	-	1.25	1.25	1.25	1.25	1.88	-	-
Sickle-winged chat	LC		-	-	-	0.63	-	-	-	-	-	-	-	-	-	-
Southern anteater-chat	LC		1.25	-	-	-	-	0.63	-	-	0.63	-	-	-	-	-
Familiar chat	LC		-	2.50	0.63	1.25	-	-	-	-	-	-	1.25	1.88	-	-
Malachite sunbird	LC		-	-	0.63	1.25	0.63	1.88	-	-	-	-	-	-	-	-
Greater double-collared sunbird	LC		2.50	0.63	0.63	0.63	-	2.50	-	-	-	-	0.63	-	-	-
Cape weaver	LC		-	-	-	-	-	0.63	-	-	-	-	0.63	-	-	-
Southern masked weaver	LC		-	-	-	-	-	-	-	-	1.88	-	-	-	-	-
African firefinch	LC		-	-	-	-	-	-	-	-	-	-	1.25	-	-	-
Cape sparrow	LC		-	-	-	1.88	-	0.63	-	-	-	-	-	-	-	-
African pipit	LC		5.00	1.88	2.50	1.88	2.50	2.50	0.63	3.13	2.50	1.88	1.88	0.63	-	-
Yellow-fronted canary	LC		-	-	0.63	-	-	-	-	-	-	-	-	-	-	-
Streaky-headed seedeater	LC		1.88	1.25	-	-	-	-	-	-	-	-	-	0.63	-	-
Cape canary	LC		-	-	1.88	-	-	-	-	-	-	-	-	-	-	-
Cape bunting	LC		-	1.88	1.25	-	-	-	-	-	-	0.63	1.88	1.25	-	-
Lark-like bunting	LC		-	-	-	-	-	-	-	-	-	1.88	3.75	-	-	-

7.4. Walking transect surveys

The results of the walking transect surveys within the Fronteer site are summarised in Table 5. This gives the number of birds counted each month, per km length of transect along with their conservation status (IUCN/South Africa Red Data Book). Generally, only low numbers were recorded during these surveys. These surveys did record a high diversity of small terrestrial species, though only two species of higher conservation importance (Blue Crane and Southern Black Korhaan).

7.5. Survey Weather and Climate Conditions

It is important when considering the results of these baseline surveys to consider that the surveys coincided with a very dry period, with very little rainfall across the entire Karoo region. Weather patterns and conditions change annually and this will influence the ecological state of the area. Consideration therefore has been given to the longer-term conditions that will occur over the lifetime of the wind farm.

8. BIRD DATA ANALYSIS

Given the potential impacts identified above that could affect the birds on the Fronteer site, further analyses were undertaken to better understand the factors affecting the distributions of key species and the risks of collision and disturbance. This included spatial modelling, potential range loss calculations and collision risk modelling to quantify risk to the Priority species (i.e. those Species of Conservation Concern at risk of impact).

8.1. Avifaunal Sensitivities: Species of Conservation Concern

Key species have been identified as those of higher conservation value that would be at risk from the proposed wind energy development. Species of Conservation Concern identified during the June 2019 - August 2020 baseline bird surveys in the Eastern Block included:

- **Martial Eagle** - two territories were found in proximity to the proposed wind farm, and a third further to the west outside the surveyed area (19km west from the site). One nest site on the eastern edge of the survey area (2.7km from the nearest Fronteer turbine) was found in May 2019 with prey delivery observed. The second was found in June 2020 at a new location (Figure 4), 5.9km from the nearest Fronteer turbine. The VP surveys through did not indicate any areas of notably higher flight activity, apart from around the active nest to the south of the wind farm site (Figure 7).
- **Verreaux's Eagle** - one active nest was confirmed in the Eastern Block, 9km south-west from nearest proposed Fronteer turbine location. Another potential site was found 8km to the north-west of the nearest proposed Fronteer turbine. As these sites all lay outside the proposed wind farm, they were not covered in detail by the VP surveys, but those surveys did indicate that the closest wind turbines did not support notably higher flight activity than the generally low level observed across the survey area (Figure 8).
- **Cranes, Bustards and Secretarybird** - Blue Crane, Ludwig's Bustard, Denham's Bustard, Southern Black Korhaan and Secretarybird were all recorded during the baseline surveys. All are species of higher conservation importance. No particular concentrations of flight activity of any of these species was noted in this area during the VP surveys, and all were widely scattered at low density across the survey area during the vehicle transect surveys with no particularly important areas identified.
- **Lanner Falcon** - two Lanner Falcon nests adjacent to the Eastern Block were reported in the REDZ SEA, though the 2019-20 surveys did not find either territory to be occupied. One is 3.9km from the nearest Fronteer proposed wind turbine, the other 10.1km (both are historic records). This species was recorded on only three occasions during the VP surveys and three times during the road transect surveys, with no evidence found of nesting within the survey area.
- **Other Species of Conservation Concern** - Caspian Tern, African Marsh-harrier, Black Stork, Black Harrier, Pallid Harrier and African Rock Pipit - only a very low level of use was recorded for all of these species and no evidence of breeding within the wind farm site. A single Black Harrier was regularly seen hunting on the road verges of the R335 of the Wind Garden wind farm site (and rest of Eastern Block) in 2019, but it disappeared, returned a few months later and then left again. It was never seen in 2020.
- **Additional species** - two additional large raptor species were recorded during the baseline surveys, African Fish-eagle and Crowned Eagle. Both are classes as Least Concern so are of lower conservation importance, but as larger raptor could be at higher risk of collision. A pair of African Fish-eagles was found nesting 3.4km from the nearest Fronteer turbine location, but very little flight activity was observed through the wind farm site. The nearest Crowned Eagle breeding location was 10km from any Fronteer turbine, and this species was not observed flying through the wind farm site.

8.2. Spatial Modelling

Though the vantage point survey area did meet BLSA recommendations with regard to their coverage (exceeding 75% cover), that coverage was not complete (87% of the Fronteer wind turbines). Spatial modelling of the VP survey data was undertaken to provide additional information on two species of particular concern at higher

risk of impact (Martial Eagle and Verreaux's Eagle). The Cape Vulture modelling was not relevant to the Choke Eastern block as this species was not recorded in this area. This enabled the VP data to be used, in conjunction with data on the factors affecting the birds' flight activity, to predict these species' use of the areas that were not covered by the surveys. This provided a more complete picture of their use of the area in general, and an improved estimate of flight activity in areas that were not covered by the surveys (including for use in the collision risk modelling). The modelling methodology and results are summarised here, with more details provided in Appendix 2.

8.2.1. Analysis Methods

Flight activity data from the VP surveys were analysed using a 200 x 200m grid overlaid onto the survey area, to determine a flight activity index (measured as the total observed track length per unit observation time, using ArcGIS) of each key species in each grid square, and this value was used as the response variable in the further analysis. The grid square flight densities were analysed in relation to the following explanatory variables:

- Distance from nest site (Martial Eagle and Verreaux's Eagle);
- Habitat type (derived from South African National Land Cover 2018 survey);
- Altitude (derived from NASA Shuttle Radar Topographic Mission (SRTM) digital elevation data);
- Distance from nearest ridge line, calculated using SRTM data in Global Mapper software to identify ridge lines, using those at higher altitude (>600m);
- Slope (maximum within grid square, derived from SRTM data).

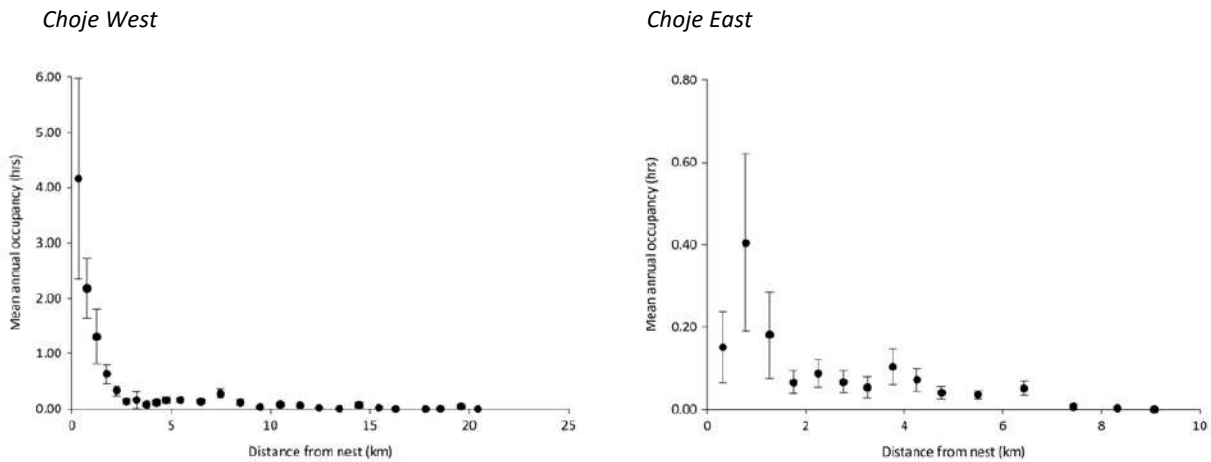
Other measures of local terrain variability were also investigated, including standard deviation of altitude with each grid square, terrain ruggedness index (Riley et al. 1999) and mean slope, but as they were strongly correlated with each other only one (maximum slope) was selected for inclusion in the modelling (as the one that gave the strongest relationship with flight activity). Similarly, alternative measures of topographic measures were considered, including topographic position index (Guisan et al. 1999) and mean slope, but these did not give as high a correlation with flight activity as maximum slope and were highly inter-correlated, so only maximum slope was taken forward for the modelling. Habitat was initially included in the analysis but was dropped from the final models as it did not improve the precision of those models.

Spatial Autoregressive Modelling (StataCorp 2019) was used to analyse these data to test whether each species' abundance was statistically significantly related to these explanatory variables. This enabled the latitude and longitude of the central point of each grid square to be included in the modelling to account for spatial autocorrelation in the data. Data are presented for the Choke East and West blocks, though there were more data available over a wider area in the West, so that was used as the primary data source to inform the optimal buffer extents.

8.2.2. Martial Eagle

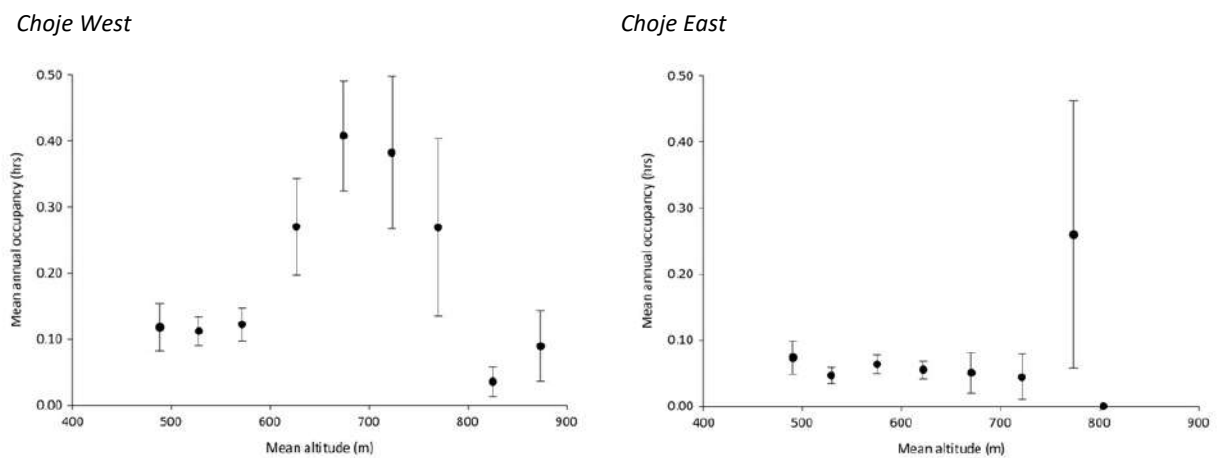
Martial Eagle flight density was strongly related to distance from the nest, but this relationship flattened out beyond 2.5km (Figure 14). The highest densities were recorded within 500m of nests and there was a steady decline in flight density with distance from the nest, but only up to a distance of 2.5km. Beyond 2.5km flight density was consistently lower.

Figure 14. Martial Eagle flight density and distance from the nest, June 2019 - August 2020 (mean + 95% confidence limits).



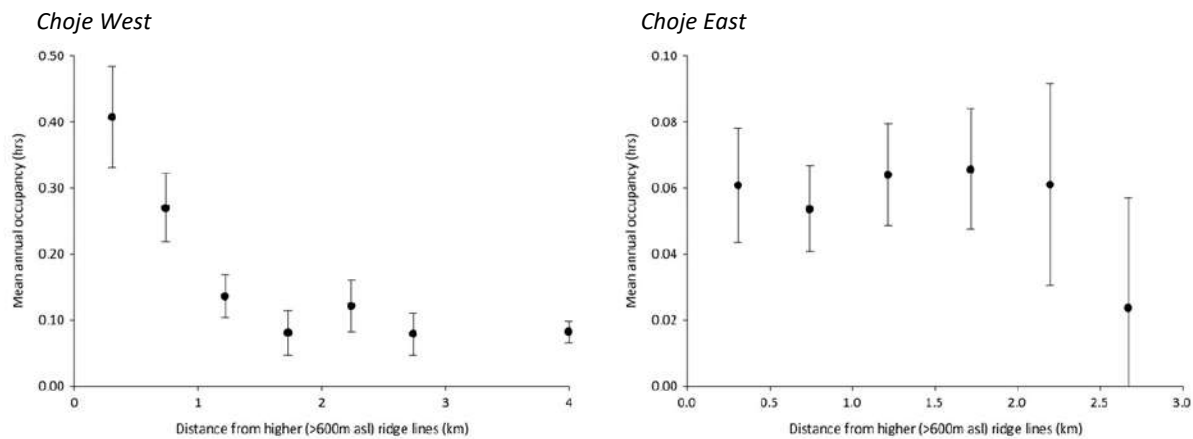
Martial Eagle flight density was lower at lower altitudes (below 600m asl) and at higher (above 800m), with higher flight activity in the 600-800m range (Figure 15), probably as a result of the altitudinal zones of the nest locations (and subsequent higher activity in proximity to nests).

Figure 15. Martial Eagle flight density and altitude (m above sea level), June 2019 - August 2020 (mean + 95% confidence limits)



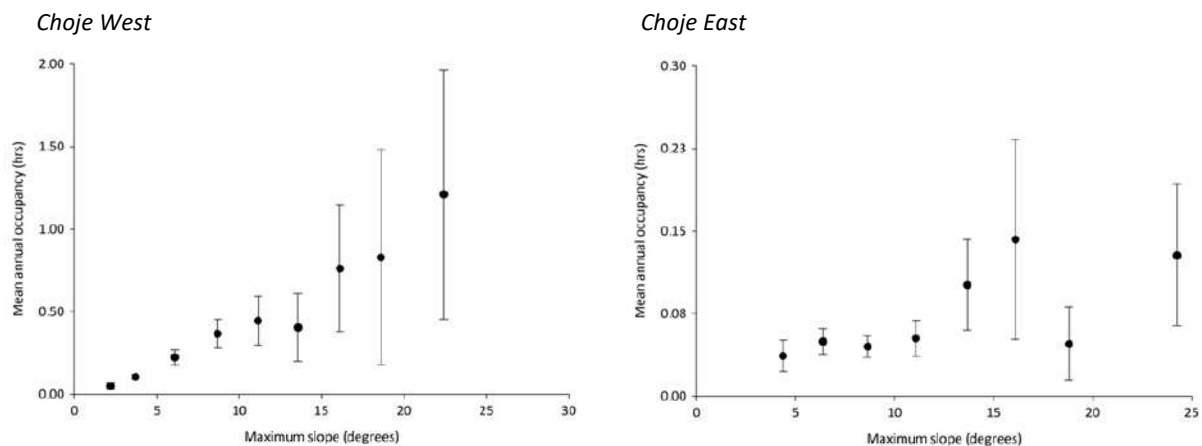
Martial Eagle flight density was also strongly influenced by proximity to higher ridge lines, with higher activity within 1km (Figure 16).

Figure 16. Martial Eagle flight density and distance from higher (>600m) ridge lines, June 2019 - August 2020 (mean + 95% confidence limits)



Martial Eagle flight density was lower in flatter areas (lower maximum slope), increasing steadily with increasing slope (Figure 17), though with increased variability on steeper slopes.

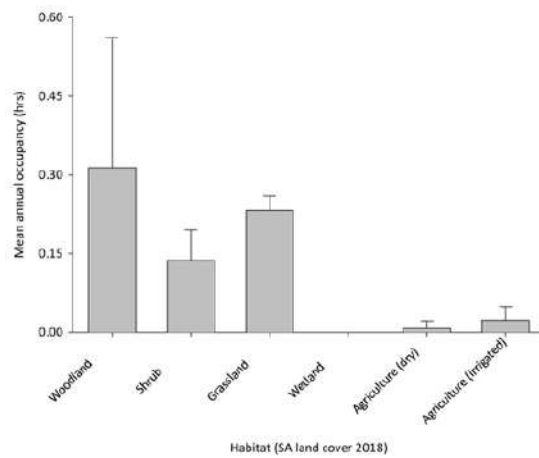
Figure 17. Martial Eagle flight density and maximum slope, June 2019 - August 2020 (mean + 95% confidence limits).



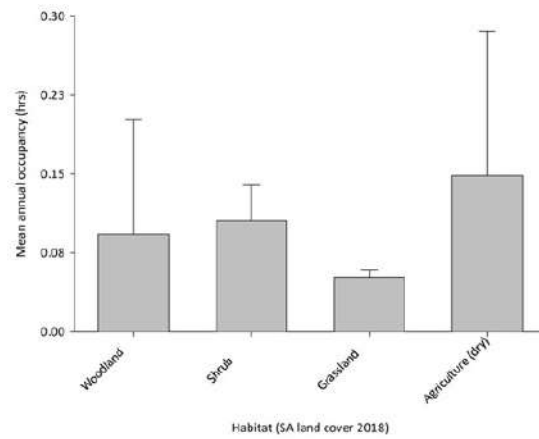
There was variation in Martial Eagle flight density between habitats, with more activity over grassland and woodlands (Figure 20), though also high variability (indicated by the large confidence interval bars). This may reflect the habitat types in proximity to the birds' nest sites, given the much higher flight densities around those sites.

Figure 18. Martial Eagle flight density and habitat type (land cover 2018), June 2019 - August 2020 (mean + 95% confidence limits).

Choje West

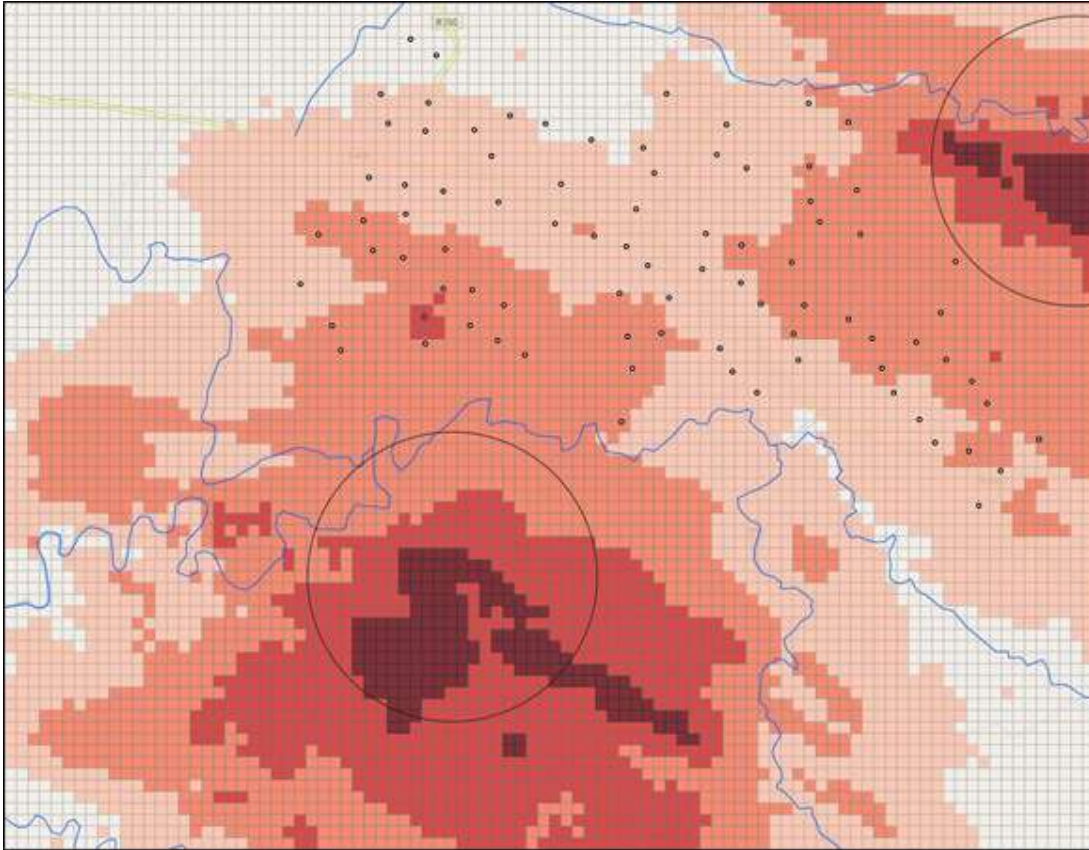


Choje East



The results of the spatial modelling for Martial Eagle showed distance from the nest and altitude to be the two variables most strongly related to flight density. The predicted distribution from the spatial modelling is shown in Figure 19. The Figure also shows a recommended turbine exclusion zone around Martial Eagle nests where flight activity was predicted to be higher. Delineation of buffers zones around nest and roost sites of more vulnerable species, drawing on the results of the spatial modelling, are discussed further in the design mitigation section below.

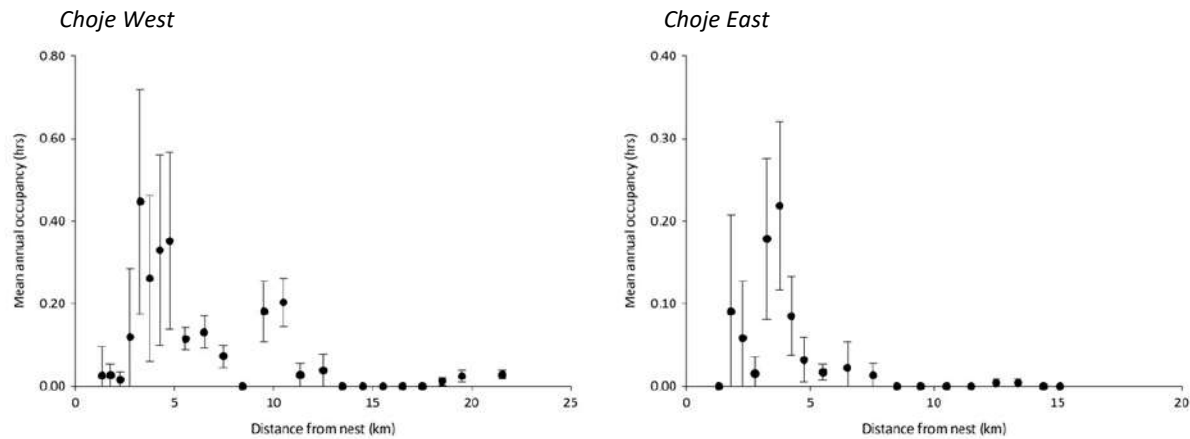
Figure 19. Predicted Martial Eagle distribution in the Choje Eastern Block. Darker shading indicates higher predicted use, with the proposed turbines (small white dots) and turbine exclusion zones (larger black extended circles) also shown. Also see Appendix 2 for further information on the spatial modelling.



8.2.3. Verreaux's Eagle

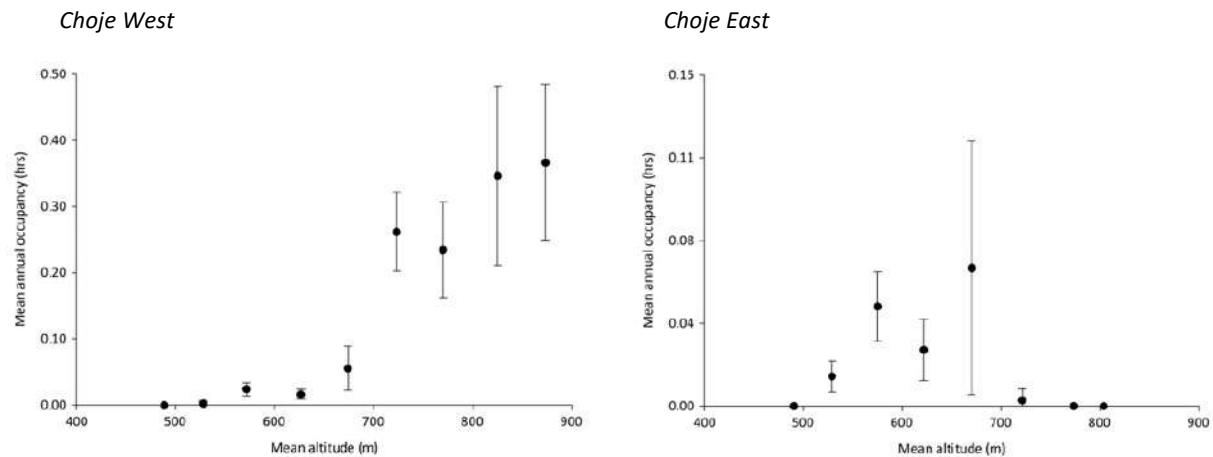
There were no Verreaux's Eagle nests within 1.5km of any proposed wind turbine locations (to comply with BLSA guidance, BLSA 2017), so there was less coverage of areas in proximity to nests during VP surveys (which were designed primarily to maximise coverage of the wind farm site). As a result, flight activity data within that zone are limited, and the usual increased flight activity in closer proximity to the nest site was not apparent (Figure 20).

Figure 20. Verreaux's Eagle flight density and distance from the nest, June 2019 - August 2020 (mean + 95% confidence limits).



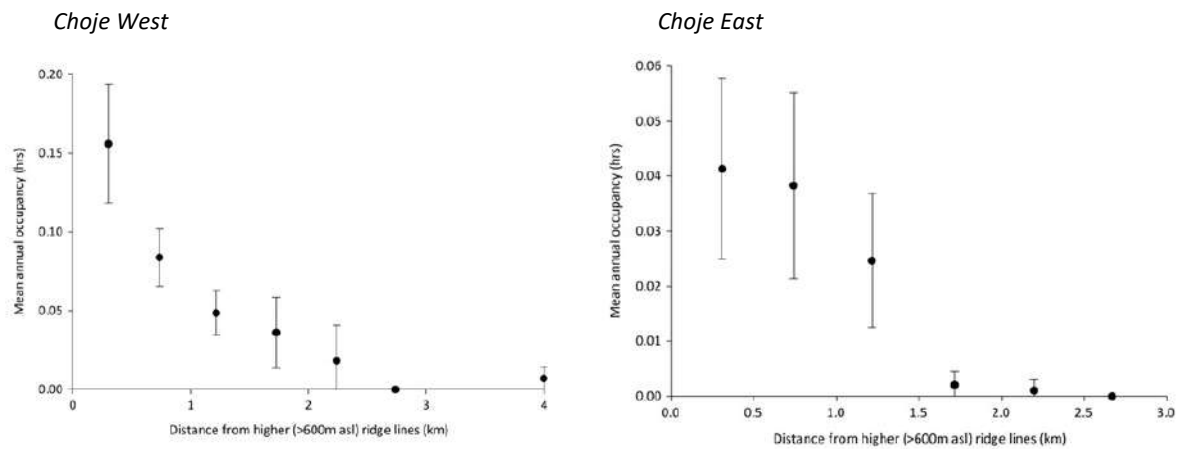
Verreaux's Eagle flight density showed a strong positive relationship with altitude, with very little flight activity in areas below 700m, and higher activity above 800m above sea level (Figure 21).

Figure 21. Verreaux's Eagle flight density and altitude (m above sea level), June 2019 - August 2020 (mean + 95% confidence limits).



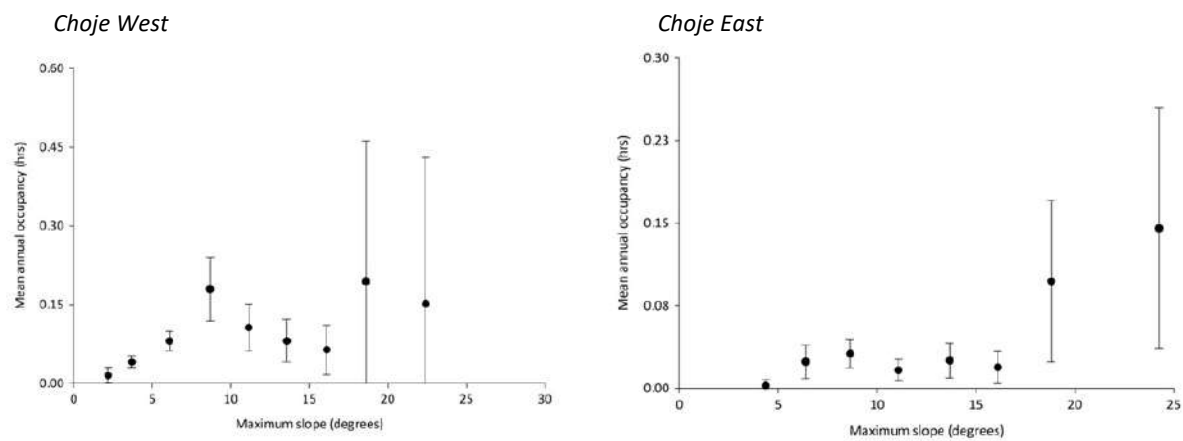
Verreaux's Eagle also exhibited a strong preference for flying near higher ridge lines, with higher flight density within 1km of ridges (Figure 22).

Figure 22. Verreaux's Eagle flight density and distance from higher (>600m) ridge lines, June 2019 - August 2020 (mean \pm 95% confidence limits).



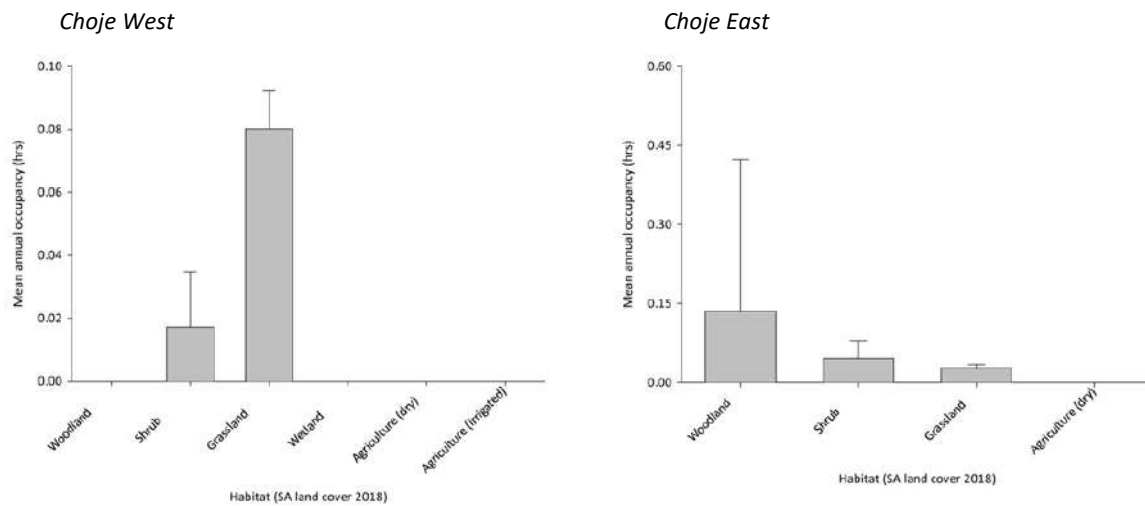
Verreaux's Eagle flight density was lower in flatter areas (lower maximum slope), with notably higher activity on slopes exceeding 15 degrees (Figures 23), and with higher variability on steeper slopes.

Figure 23. Verreaux's Eagle flight density and maximum slope, June 2019 - August 2020 (mean \pm 95% confidence limits).



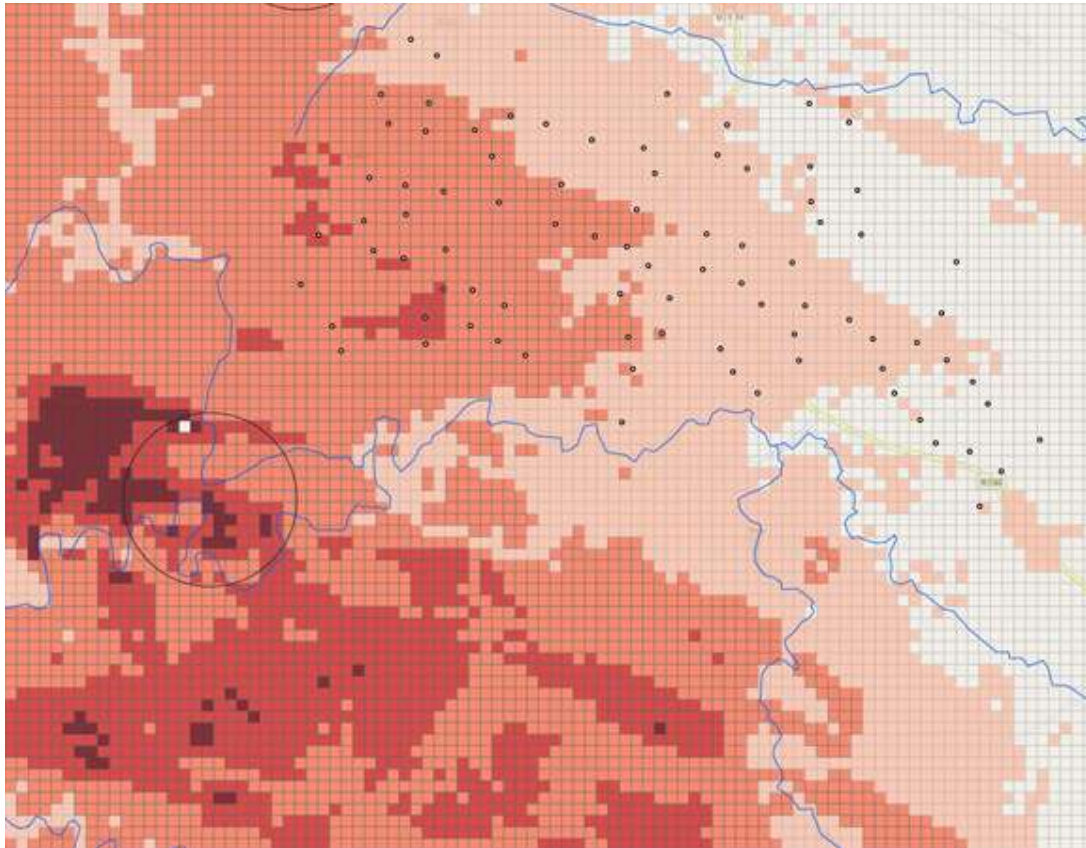
Verreaux's Eagle showed a strong preference for open grassland habitat, with the majority of records from this habitat class (Figure 24), more records were observed over woodlands in the East.

Figure 24. Verreaux's Eagle flight density and habitat type (land cover 2018), June 2019 - August 2020 (mean + 95% confidence limits).



The results of the spatial modelling for Verreaux's Eagle showed distance from the nest to be less important for this species (as discussed above, few data were collected in closer proximity to Verreaux's Eagle nests, where flight activity would be expected to be higher), but altitude was strongly related to flight density. The predicted distribution from the spatial modelling is shown in Figure 25. The Figure also shows a recommended turbine exclusion zone around Verreaux's Eagle nests where flight activity was predicted to be higher (and in line with BLSA 2017 guidance). Delineation of buffers zones around nest and roost sites of more vulnerable species, drawing on the results of the spatial modelling, are discussed further in the design mitigation section below.

Figure 25. Predicted Verreaux's Eagle distribution in the Choke Eastern Block. Darker shading indicates higher predicted use, with the proposed turbines (small white dots) and turbine exclusion zones (larger black extended circles) also shown. Also see Appendix 2 for further information on the spatial modelling.



8.3. Collision Risk Modelling

One of the main potential ornithological impacts of concern for the Fronteer wind farm is collision with the operational turbines. Collision risk modelling (CRM) has been undertaken following the method of Band *et al.* (2007), as extensively used in the UK and elsewhere. The model runs as a two-stage process. Firstly, the risk is calculated making the assumption that flight patterns are unaffected by the presence of the wind turbines, i.e. that no avoidance action is taken. This is essentially a mechanistic calculation, with the collision risk calculated as the product of (i) the probability of a bird flying through the rotor swept area, and (ii) the probability of a bird colliding with a turbine if it does so. This probability is then multiplied by the estimated numbers of bird movements through the wind farm rotors at the risk height (i.e. the height of the rotating rotor blades) in order to estimate the theoretical numbers at risk of collision if they take no avoiding action.

The second stage then incorporates the probability that the birds, rather than flying blindly into the turbines, will actually take a degree of avoiding action, as has been shown to occur in all studies of birds at existing wind farms (Urquhart 2010, SNH 2017). Discussion as to the most appropriate avoidance rates to apply is included in the following section.

The CRM was carried out for all six key Species of Conservation Concern that were observed flying within the Fronteer collision risk zone at rotor height; Martial Eagle, Verreaux's Eagle, Blue Crane, Ludwig's Bustard, Southern Black Korhaan and Lanner Falcon.

It is important to remember that the aim of this collision modelling is not to produce the most likely outcome in terms of the numbers of collisions likely to occur during operation of the wind farm, but rather to produce a reasonable worst-case estimate in order to inform the assessment process, i.e. the highest numbers of collisions that could reasonably occur in the absence of mitigation.

The collision model requires data on bird body size and flight speed. Body sizes and baseline mortality rates were taken from Roberts Birds of South Africa (Hockey et al. 2005) and Kemp and Marks (2020). Flight speeds were taken from Alerstam et al. (2007) for ecologically similar species, as none were available for any of the six key species. The data used in the collision risk modelling are shown in Table 6.

Table 6. Key species body size and flight speed data used in the collision risk modelling

Species	Body length (m)	Wing span (m)	Flight speed (m/s)
Verreaux's Eagle	0.88	2.40	11.9
Martial Eagle	0.81	2.15	10.4
Blue Crane	1.15	1.90	15.0
Ludwig's Bustard	0.85	1.65	15.0
Southern Black Korhaan	0.52	1.01	15.0
Lanner Falcom	0.44	1.01	12.1

The collision modelling requires a range of input data on the wind turbine specifications, which were provided by the client and the turbine manufacturers (Table 7). This modelling has taken a reasonable worst-case approach, running the model for the turbine option likely to give the highest collision risk of the options being considered. The model was run for this report on the current proposed 38-turbine layout being assessed for the EIA.

Table 7. Wind turbine data used in the Fronteer collision risk modelling.

Specification	Wind turbine input data
Number of turbines	38
Hub height	120m
Rotor diameter	160m
Height to blade tip	200m
Minimum height of blade above ground	40m
Rotational speed (variable – mean of range used)	11 rpm
Blade maximum chord	4.2m
Blade pitch (variable – mean value used)	15°
Turbine operation time (when not constrained by high/low wind speed or maintenance activity)	90%

Data from the VP surveys were used to determine the proportion of flights at rotor height, with all flights between 35m and 250m treated (conservatively to take into account the difficulty of accurately estimating flight heights) as being at rotor height (actual rotor height would be 40-200m above ground level).

The collision risk zone was defined, as per Band et al (2007) and SNH (2017) guidance as a 500m zone around the proposed wind turbine locations.

The VP survey protocol enabled viewing to 2km and enabled a high coverage of this zone (including viewing of the full risk volume of 33 of the 38 turbine locations, i.e. 87%).

The results of any collision risk modelling using the Band et al. (2007) approach is highly sensitive to the avoidance rate used (Chamberlain et al. 2006). Application of an appropriate rate is therefore of fundamental importance in undertaking such modelling. However, there are very few studies at existing wind farm where avoidance rates have been fully determined, comparing pre-construction flight activity with the actual numbers of collisions post-construction (Urquhart 2010). The approach generally used to address this is to apply a precautionary rate based on the available data, such that any collision prediction is unlikely to be exceeded (i.e. represents a reasonable worst case). Where data on actual avoidance rates of particular species/groups have been established, then this has usually enabled a higher rate to be safely applied. For example, SNH has recently recommended a move from a 99% rate to 99.8% for geese based on recent research (Douse 2013). SNH now recommends using a value of 99.8% as an avoidance rate for geese (Douse 2013), 99.5% for divers and several seabird species, 99% for several birds of prey (including Golden Eagle and Hen Harrier), and 98% for most other species (Urquhart 2010, SNH 2017).

There is a lack of specific avoidance rate data from South Africa and on the Species of Conservation Concern at Fronteer. As collision avoidance rates are not yet known for the species of concern, suitable international species have been used as proxies, following the same assumptions as made for the previous CRM. The selection of appropriate rates followed SNH guidance and with reference to the bird-wind farm literature. As recommended in SNH guidance, a precautionary 98% was adopted as the default value (SNH 2017) but the work has also explored whether particular species exhibit similar behaviour to more vulnerable species such as White-tailed Sea Eagle and Kestrel, or such behaviour that would reduce risk (and hence allow higher rates to be used as is recommended by SNH for Golden Eagle and Hen Harrier for example). The collision risk modelling results have been presented for each layout for a range of avoidance rates to inform the assessment but the most appropriate rate to apply in each specific case is also indicated. Most weight has been given to the precautionary SNH position of applying a 98%, though Verreaux's Eagle in particular shares an ecological similarity with Golden Eagle (albeit at a generally higher breeding density), for which SNH recommends a 99% avoidance rate, so applying that rate could be justified (particularly in relation to adult birds). The Golden Eagle is recognised as the Verreaux's Eagle's closest relative (Wink and Sauer-Gürth 2000).

8.3.1. Collision Modelling Results

The results of the collision risk modelling for the proposed 38-turbine layout for each of the six key species are summarised in Tables 8 and 9. Table 8 gives the number of collisions predicted per year based on a range of avoidance rates (95% - 99.5%). Verreaux's and Martial Eagle are both large non-colonial eagles, and the area in proximity to their nest sites has been avoided in the design process (so 'riskier' display flights and early juvenile flights would be less likely to occur in the wind farm). As a result, 99% should be a suitable precautionary avoidance rate to apply (as is used in the UK for Golden Eagle, an ecologically similar species), and this has been used as the primary value to inform the assessment. For the other species the SNH default precautionary 98% value has been used as the primary value to inform the assessment.

Table 8. Collision risk modelling predictions based on 2019-20 data for the Fronteer wind farm 38-turbine layout, applying a range of avoidance rates. Predictions in bold represent the precautionary result used in the further assessment.

Species	Precautionary predicted number of collisions per year			
Avoidance Rate	95%	98%	99%	99.5%
Martial Eagle	0.737	0.295	0.147	0.074
Verreaux's Eagle	0.024	0.009	0.005	0.002
Blue Crane	0.752	0.301	0.150	0.075
Ludwig's Bustard	0.024	0.010	0.005	0.002
Southern Black Bustard	0.041	0.016	0.008	0.004
Lanner Falcon	0.191	0.076	0.038	0.019

Table 9. Collision risk modelling predictions based on 2019-20 data for the Fronteer wind farm 38-turbine layout: annual risk, year per collision and total collisions in 25 years.

Species	Martial Eagle	Verreaux's Eagle	Blue Crane	Ludwig's Bustard	Southern Black Korhaan	Lanner Falcon
Primary avoidance rate used for assessment	99%	99%	98%	98%	98%	98%
Collision prediction (annual)	0.147	0.005	0.301	0.010	0.016	0.076
Years per collision	6.8	211.2	3.3	103.0	61.6	13.1
Total collisions in 25 years:	3.69	0.12	7.52	0.24	0.41	1.91

* Note this is an extrapolation from baseline data in absence of mitigation, not a prediction of the actual number of collisions expected from the wind farm.

The cumulative collision risk from the Choje wind farms in combination also needs to be considered. Table 10 gives the predicted collision risks for the two proposed wind farms in the Choje Eastern Block.

Table 10. Cumulative collision risk for the Choje wind farms in the Eastern Block (annual risk).

	Martial Eagle	Verreaux's Eagle	Cape Vulture	Blue Crane	Secretary-bird	Lanner Falcon	Ludwig's Bustard	Southern Black Korhaan
Avoidance rate:	99%	99%	95%	98%	98%	98%	98%	98%
Wind Garden	0.04	0.11	0	0.22	0	0	0.04	0.03
Fronteer	0.15	0.005	0	0.30	0	0.08	0.01	0.02
TOTAL EAST	0.19	0.12	0	0.52	0	0.08	0.05	0.05

8.3.2. Collision Modelling Interpretation

Whilst the Band collision model produces a quantitative estimate of the numbers of birds that might collide with the wind turbines, those numbers need to be put into the context of the existing mortality to enable their significance to be assessed. The same level of additional mortality on a population that has a low level of background mortality could potentially have a much more important effect than on a population with a higher level of existing mortality. The collision mortality needs to be assessed in the context of each species population dynamics. In the UK, a 1% increase over the baseline mortality is now frequently being used as an initial filter threshold above which they may be a concern with the predicted collision mortality (and hence requiring further investigation). Collision risks below this level are usually considered not to be significant.

It is not currently possible to carry out a detailed population analysis on any of the species at this site because of a lack of data on the key species from local population studies. We are not aware of such information being available (or presented in any other avifaunal assessments in this region). Rather an alternative approach has been taken, making a professional judgement on the collision impacts, informed by the predicted risk from the collision modelling.

No specific guidance or assessment methodology is currently available in South Africa in relation to the determination of levels of predicted additional mortality that should be considered significant, or the appropriate spatial scale at which population impacts should be assessed, so this has instead been based on professional judgement (and mitigation will be implemented on a precautionary basis, requiring the implementation of collision risk reduction measures wherever any moderate/high risk to key species was identified by the collision modelling).

In the case of the predicted collision risks from the Fronteer wind farm, it is clear that the predicted levels of additional mortality for all species are low numerically, and as such it can be reasonably concluded without any detailed population analysis that these effects would not be significant, at either the regional or the national scale. Notwithstanding this, mitigation measures should still be implemented to minimise the risk of collision to Martial Eagle and Verreaux's Eagle in particular, so that the Fronteer site makes as small as possible a contribution to the overall cumulative risk from all the Choje wind farms as a whole.

8.4. Disturbance Effects – determining Range Loss

The implementation of the recommended buffers from known eagle nest sites that were put in place primarily to reduce collision risk (1.5km for Verreaux's Eagle and 2.5km for Martial Eagle; see Design Mitigation section below), also removes possibility of disturbance to these eagle nest sites. The main residual disturbance issue would therefore be the loss of foraging habitat around the wind farm as a result of displacement. From experience at existing wind farms, birds are likely to avoid the close proximity of the wind turbines. There is uncertainty as to the precise extent of such an effect, but would be reasonable in the assessment to assume that

it could occur. Given results from post-construction studies of other raptor species, particularly Golden Eagle (e.g. Walker et al. 2005), it has been considered that these raptors at this site might have reduced flight activity within 500m of the wind farm (as a reasonable worst case). A 500m buffer has therefore been used in this assessment as a precautionary distance over which disturbance to eagles might reasonably occur. The assessment also considered a smaller potential disturbance zone of 250m around the wind turbines, as the area in which disturbance (and hence displacement of foraging eagles) was more likely to occur (though the assessment focused primarily on the more precautionary 500m buffer).

There are two raptor Species of Conservation Concern using the wind farm site and breeding within the survey area that make repeated use of traditional nest sites (and hence could be more affected by disturbance), Verreaux's Eagle and Martial Eagle. In order to inform the assessment, range analyses have been carried out for these two species, following the process set out by McGrady et al (1997) developed for Golden Eagle:

- Determination of range centre – taken as the active nest location for both species. Where more than one nest location was known for a territory the one closest to the wind farm was used (as a worst case). Where the precise nest location had not been determined the best estimate was used.
- Determination of territory boundaries with neighbouring eagles – (i) draw a straight line joining the two range centres, (ii) find a point on this line half-way between centres, (iii) draw a line through the half-way point at right angles to the first line.
- Determination of territory boundaries without neighbouring eagles – draw a curved line at 2.9 km (Verreaux's Eagle) or 5.8km (Martial Eagle) radius from the range centre to connect adjacent boundary lines drawn in Step 2. These distances were derived from reported territory sizes for these species (26km² for Verreaux's Eagle, from Davies 1994, and 106km² for Martial Eagle (van Eeden *et al.* 2017). Whilst these studies were undertaken in higher-density areas for both species than in the Choje region (and hence at Choje range sizes may be larger), this would just reduce the magnitude of the proportionate impact on the range.

Range loss was predicted by overlaying a 500m and a 250m buffer around the proposed wind turbines onto the estimated ranges and measuring the percentage of each range that could be lost through displacement. The results of this range analysis are summarised in Table 11.

The magnitude of these disturbance impacts (and hence significance of effect) relates to the ecological consequences of any range loss. Ranges of golden eagles have been reported as being abandoned following a 40% loss of habitat (Watson et al. 1987) and reduced productivity associated with a 10-15% loss (Whitfield et al. 2001), though not in all cases and the effects of habitat loss generally can be complex. For a heavily constrained range (for example by a close neighbour or reduced availability of suitable habitat in the wider area), any additional loss is likely to be more ecologically important than an unconstrained range (Whitfield et al. 2001, 2007).

The magnitude of the potential habitat loss for Verreaux's Eagles is clearly negligible, and would not constitute a significant impact for either of the two ranges in proximity to the wind farm site.

Martial Eagles have much larger ranges than Verreaux's Eagles, so would be predicted to be less vulnerable to range loss. The greater impact would be on the north-eastern range, but even so this would constitute a loss of only 19.3% of the birds' range. Given the low use that these birds make of this area (from the vantage point survey results and from the range modelling), such a loss would not be considered significant.

Table 11. Predicted Verreaux's Eagle and Martial Eagle range loss for the proposed 38-turbine Fronteer Wind Farm, assuming complete displacement of both species to 250m or 500m from turbines.

Species	Range	Area of range within 250m of proposed turbines (km ²)	% range loss if displaced 250m from turbines	Area of range within 500m of proposed turbines (km ²)	% range loss if displaced 500m from turbines
Verreaux's Eagle	SW (active confirmed)	0	0%	0	0%
	NW (potential)	0	0%	0	0%
Martial Eagle	SW (active confirmed)	0.02	0.02%	0.35	0.3%
	NE (active confirmed)	17.2	16.2%	20.5	19.3%

In conclusion, no potentially significant disturbance impacts have been identified for these species, but mitigation measures will be needed when considering the cumulative effects of the Choje wind farms in-combination.

8.5. Disturbance Effect - Decommissioning phase (dismantling)

The ornithological effects that are likely to occur during decommissioning will be similar to those during construction, though given the reduced time required, and the presence of existing infrastructure, they would be of a lower magnitude. Significant effects are not likely but precautionary mitigation measures will be implemented to ensure this, as detailed below.

9. CONSIDERATION OF ALTERNATIVES

The National Environmental Management Act (NEMA) requires the consideration and assessment of feasible and reasonable alternatives in the BA process. Alternatives can include: Location of the proposed activity; Type of activity; Layout alternatives; Technology alternatives; and 'do-nothing' alternative.

The proposal has been through a series of iterative layout designs, removing wind turbines from more sensitive areas. This has included implementation of the buffers discussed below and as shown in Figure 27. The original 128-turbine layout is shown in Figure 26, alongside the current proposed EIA layout for comparison. Further details of this process are given in Chapter 3 of the Basic Assessment Report.

The 'do-nothing' option would result in no wind farm or associated infrastructure being built on site. As a result, none of the impacts on birds described above would take place. The significance of impacts of the 'do-nothing' option on avifauna would therefore be None.

Micro-siting of the proposed infrastructure will be required as the project progresses and will result in a preferred layout that minimises the predicted negative impacts.

9.1. Design Mitigation and Ornithological Buffers

It is best practice when designing a wind farm to use the baseline ornithological data to inform the design to minimize any ornithological impacts. Where key vulnerable species (such as eagles) use traditional nest sites over many years, it is possible to avoid locating turbines in proximity to known nest sites. For most species it would be expected that flight activity (and hence collision risk) would be higher in closer proximity to nest sites, so leaving a turbine-free buffer around nest sites should reduce collision impacts. At the same time, it should also remove any disturbance impacts on eagles at the nest and reduce any displacement of birds from more important (closer to the nest site) foraging areas.

The surveys have identified a range of key species that could be at risk from the wind farm, including Martial Eagle, Verreaux's Eagle, Blue Crane, Ludwig's Bustard, Southern Black Korhaan and Lanner Falcon. Design mitigation has been implemented to avoid areas of higher risk to reduce the ornithological impacts of the wind farm for each of these species as set out below.

9.1.1. Verreaux's Eagle

Verreaux's Eagle nests have had two buffers implemented. Firstly a 1.5km red zone buffer (a wind turbine no-go area), in line with BLSA (2017) guidance for a minimum buffer of that size. Secondly an amber caution zone was identified for the zone 1.5-3km from the nests, in which turbines were reduced as much as possible in the design process, and where increased precautionary mitigation measures will be implemented (including shutdown on demand and a single black blade for each turbine to increase visibility - see below).

BLSA (2017) advises further than a 3km no-turbine buffer should be implemented unless there are local reasons why this would not be appropriate. The baseline VP flight activity data were used to explore the benefit of this wider buffer. These showed that Verreaux's Eagle flight density at the site was not significantly higher in the 1.5km - 3km zone than beyond 3km, so implementing a wider turbine-free buffer to 3km would not have reduced collision risk any further than the 1.5km buffer that has been put in place.

Where nests were not confirmed, the precautionary assumption was made that a potential site could be used, and has been treated in the same way as confirmed active sites, as even if not used in 2019 or 2020, it could be in future years.

BLSA (2021) has recently produced a draft update to its 2017 guidance, based largely on recent research on Verreaux's Eagle published by Murgatroyd et al. (2021). This paper highlights that circular buffers do not optimise protection, and that consideration of the features such as distance to nest, distance to conspecific nest, slope, distance to slope and elevation can provide a more efficient way to reduce collision risk. The paper shows

that even adopting very wide buffers, the collision risk to eagles is not removed and that a residual collision risk will remain, because (as the baseline surveys have shown at Fronteer) the eagles range widely from their nests.

The draft updated BLSA guidance recommends the adoption of a minimum 3.7km buffer from nests (unless the Murgatroyd et al spatial modelling has been undertaken to show that this includes lower risk areas), or 5.2km in the absence of any such modelling without detailed survey evidence. Murgatroyd et al however note that even with a 5.2km buffer this still would only capture 50% of collisions. There will, therefore, be a need for further mitigation measures to reduce collision risk to this species beyond design mitigation (as set out below and in the Ornithological Mitigation Plan in Appendix F).

9.1.2. Martial Eagle

BSLA has not published specific guidance on Martial Eagle, so the buffers implemented for this species are based on a combination of the results of the baseline surveys and published information on this species' ranging behaviour. They have a larger home range than the Verreaux's Eagle, with territories of 106km² reported for breeding adults (van Eeden *et al.* 2017), equivalent to a range of about 5-6km from the nest, so a core range of 2-3km would be likely.

The baseline data on flight activity from the study area showed Martial Eagle flight density to be higher within 2.5km of active nest sites, though not beyond that distance (see Figure XX above). A minimum 2.5km red no-go buffer was therefore implemented for all Martial Eagle nest sites. The results of the spatial modelling were used to search for any further areas of higher eagle flight activity outside this 2.5km zone around each nest, and any such areas identified were added to the red turbine no-go buffer.

Additional to that, a 5km amber caution zone was identified in which turbines were reduced as much as possible in the design process, and where increased precautionary mitigation measures will be implemented (including shutdown on demand and a single black blade for each turbine to increase visibility - see below).

9.1.3. Secretarybird

The nest sites of one other large raptor nest (Secretarybird) were also considered for buffering as a precautionary measure to reduce collision risk. This species' IUCN threat status has recently been updated from Vulnerable to Endangered. Flight activity around all confirmed and probable nest site locations identified during the surveys was assessed, to determine if there would be any benefit in removing turbines from a zone around the nest sites. There was one such nest site location identified within the Fronteer site (see Figure 4), but flight activity in that area was very low, so it was not considered necessary to add any further buffering to that specific nest (as it would not have materially reduced collision risk).

9.1.4. Bustards and Cranes

No specific areas of higher importance for cranes and bustards were identified using the road transect data, so no spatial constraints on the wind farm were considered to be required for these species.

9.1.5. Summary of Buffers Implemented

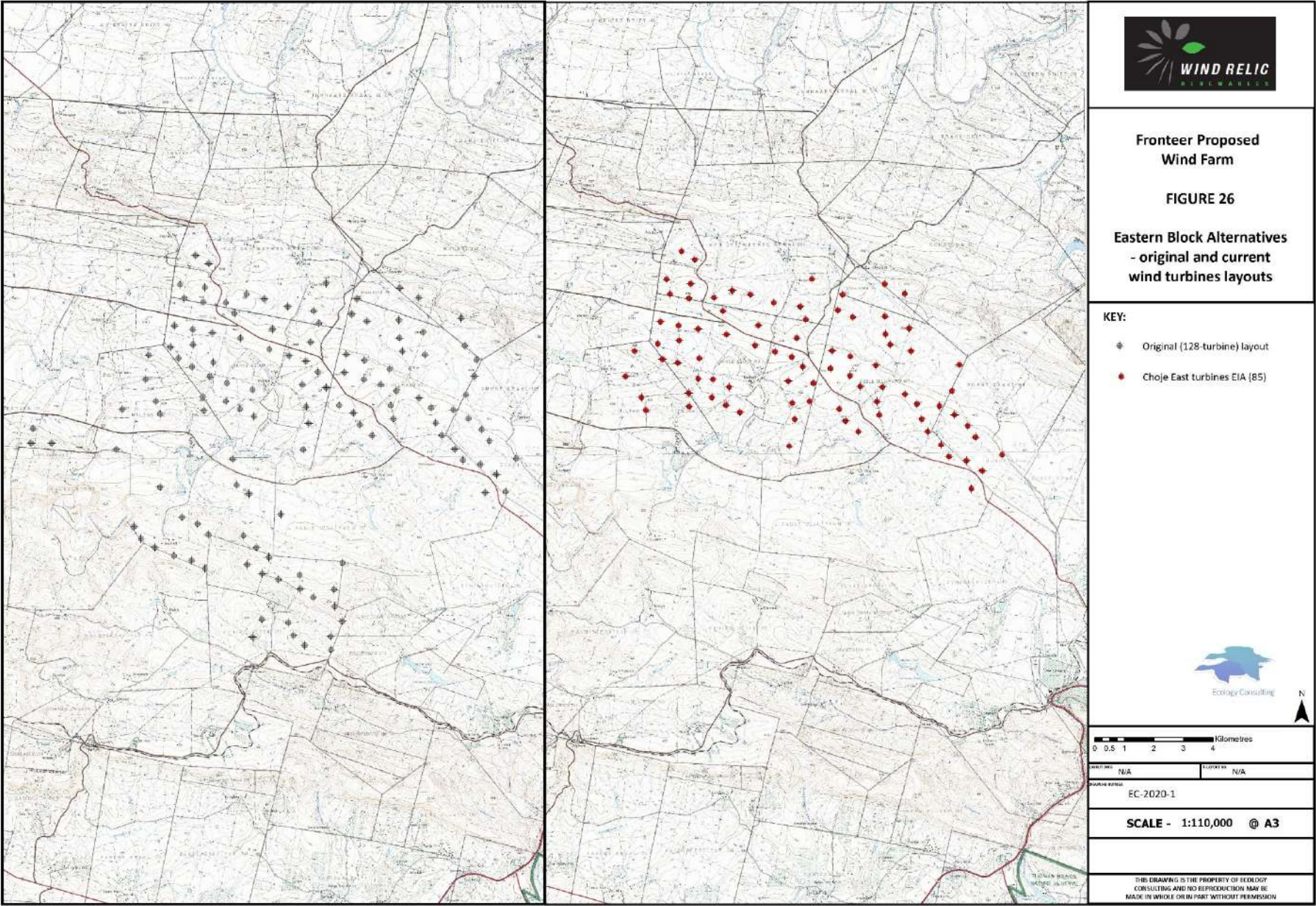
Two categories of buffers were identified in the assessment, red zones, from which wind turbines have been completely excluded, and amber zones, in which turbines were reduced as much as possible in the design process, and where increased precautionary mitigation measures will be implemented. The red zones comprised:

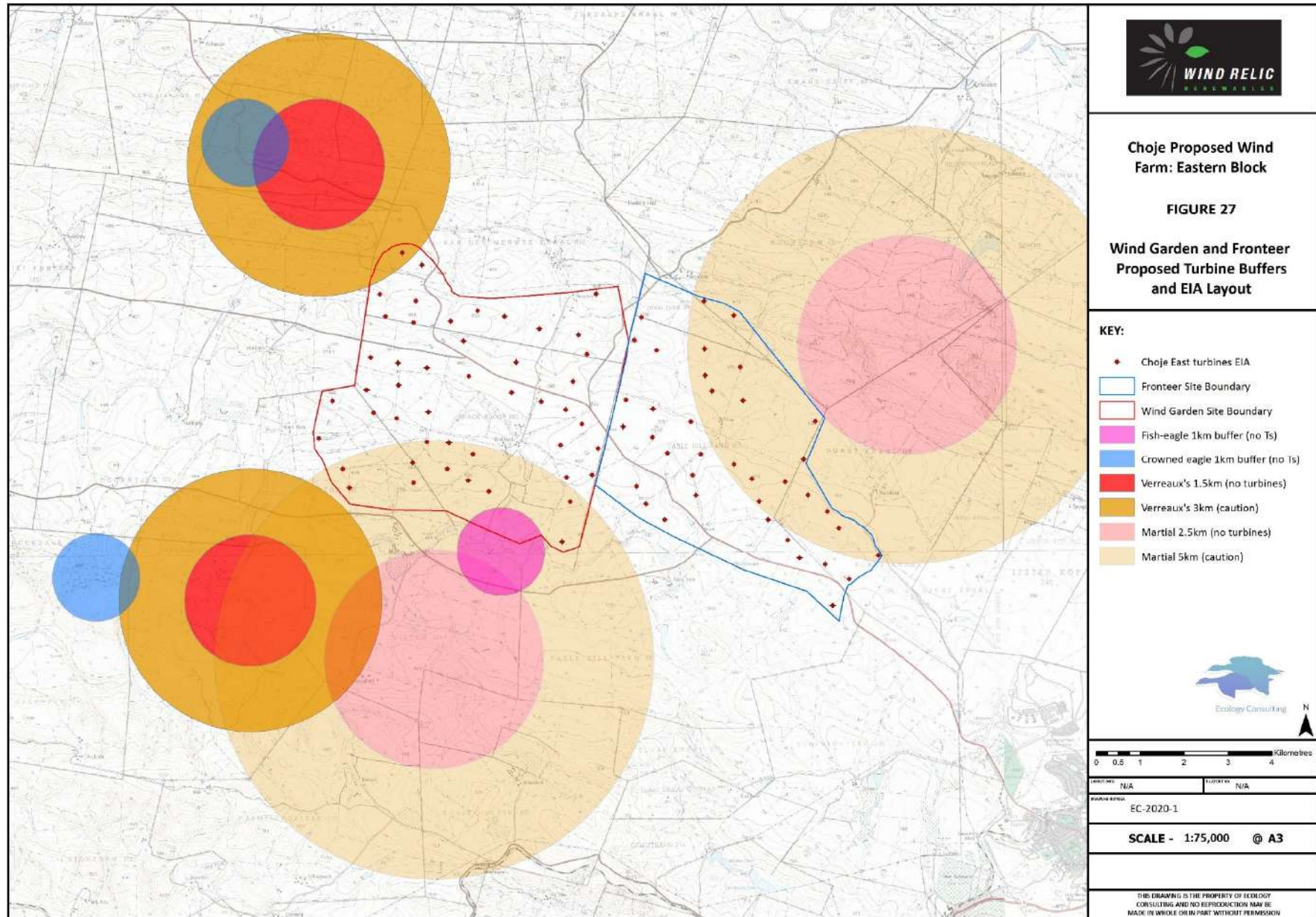
- Verreaux's Eagle nest sites - 1.5km
- Martial Eagle nests site - 2.5km plus any other areas of higher flight activity

The amber zones comprised:

- Verreaux's Eagle nest sites - 1.5km
- Martial Eagle nests site - 2.5km plus any other areas of higher flight activity

These zones across the Choje East Block (including the Fronteer site) are shown in Figure 27.





10. IMPACT ASSESSMENT

Given the potential impacts identified in Section 4 that could affect the birds on the Frontier site, the assessments below are all made in a qualitative basis and rated according to the criteria (supplied by Savannah shown in Appendix A), and is based on the professional judgement of the specialists, fieldwork from the data collected on site during the pre-construction bird monitoring programme (June 2019 to August 2020), reported on in Section 9 and supported by the various analysis and predictions made in Section 10 and specifically the results in Table 9 for the CRM and Table 11 for the Range Loss, and Table 10, for the Cumulative CRM for all the East block wind farms.

Nine Species of Conservation Concern were recorded (from Table 3, 4 and 5) on or near the proposed Frontier Wind Farm site (Martial Eagle, Verreaux's Eagle, Blue Crane, Ludwig's Bustard, Southern Black Korhaan, Secretarybird, Lanner Falcon, Denham's Bustard and Black Harrier). Seven of these were classed as Priority species because of their higher potential to interact with the seven identified impacts at this site (Martial Eagle, Verreaux's Eagle, Blue Crane, Ludwig's Bustard, Southern Black Korhaan, Lanner Falcon, and Secretarybird).

Before every Impact Table a list rated the Priority species with Low, Medium or High score for that specific impact to get a better understanding of how each species can be affected and which group of species are more at risk, i.e. raptors (wing-hunting species) or large terrestrial birds (walking-foraging species). The combined effect of these species assisted in the assessment decision-making in the different Impact Tables. These assessments had been made considering the populations of the Priority species on a national, a regional and a local scale. All these are assessed in the Tables below.

The proposed facility could pose risk to the seven Priority species in seven potential ways:

During Construction/Decommissioning

- habitat destruction risk (long-term habitat loss);
- risk of disturbance and displacement (indirect impact).

During Operation

- turbine collision risk (direct impact);
- risk due to disturbance of the wind farm (indirect impact);
- risk due displacement (not enough habitat and barrier effect);
- risk of collision and electrocution on the powerlines.

During Decommissioning

- risk due to disturbance during the dismantling of the wind farm.

10.1. Description of the Seven Priority species

10.1.1. Martial eagle

The Martial Eagle is classified as globally Endangered and regionally Endangered (IUCN 2017, Taylor et al 2015). Martial Eagle has proven susceptible to collision with wind turbines (Ralston-Paton, Smallie, Pearson and Ramalho, 2017) particularly in close association with nests (MacEwan and Smallie, 2016; Simmons and Martins, 2016), therefore ranked 4th BLSA wind farm priority ranking. This is a wide-ranging species, which can best be protected from wind turbine collision risk close to its breeding sites. By 2019, four mortalities of Martial Eagle had been recorded at wind farms in South Africa (BLSA 2019).

Two breeding sites exist to the south and north-east of the Fronteer site but outside the buffered area as described earlier. Despite the proximity of the southern nest, we have recorded this species flying only four times inside the rotor zone and two outside, in the 14-month period.

This species' general presence in the broader area, location of two breeding sites (buffered), conservation status and susceptibility to wind turbine collisions (and electrocution and collision on overhead power lines) are all factors which render it at higher risk at a new wind farm site.

Lastly, this eagle has many additional threats that restrict their existence, direct and indirect persecution (shooting, trapping, poisoning), electrocution on distribution powerlines, disturbance at breeding areas, etc. (Marnewick et al. 2015).

10.1.2. Verreaux's eagle

Verreaux's Eagle is Globally classified as Least Concern and Regionally as Vulnerable and is ranked third on the BLSA wind farm priority ranking and has been confirmed as vulnerable to turbine collisions. During the first year of monitoring at operational wind farms in South Africa, one wind farm recorded four Verreaux's Eagle fatalities in the first year of operation (Ralston-Paton et al. 2017). The fatalities occurred a considerable distance (at least 3.5 km) from suitable Verreaux's Eagle breeding habitat and on relatively flat ground (Smallie 2015). A single adult fatality occurred at another wind farm in August, again some distance from a nest 3.8 km away (Ralston-Paton et al. 2017). By 2019, six mortalities of Verreaux's Eagle had been recorded at wind farms in South Africa (BLSA 2019). Some of these fatalities were unexpected as they occurred in areas not identified as sensitive during pre-construction monitoring. Therefore, it is important to consider that collisions may not necessarily occur where predicted, and that they can occur away from areas perceived to be preferred use areas.

These eagles were often recorded during strong windy conditions (as during cold fronts) flying fast along the escarpment edges, not really slope soaring. They also fly during misty conditions when they could be at increased risk of collision, these conditions regularly occur during April/May at period when less cold fronts occur in this region (pers.obs). This region, extending much further/wider than the development area, has very limited cliffs for this species to breed and furthermore has very limited rocky/boulder/cliff habitat for these eagles to hunt, therefore these territory pairs probably need to forage over much larger areas (25km² Davies 1994) in search for enough available rocky habitat. The range analysis summarised in Table 11 above indicates that the wind farm would not be likely to threaten the viability of the range. Lastly, this eagle has many additional threats that restrict their existence, direct and indirect persecution (shooting, trapping, poisoning), electrocution on distribution powerlines, and disturbance at breeding areas (Marnewick et al. 2015).

At Fronteer, Verreaux's Eagle was only recorded once flying inside the rotor zone and zero outside and the necessary avoidance risk measures were taken, by using 1.5km buffers from the two known nest areas.

10.1.3. Blue Crane

The Blue Crane is classed Globally as Vulnerable (IUCN, 2017) and Near-threatened regionally by Taylor et al (2015). It is ranked number 11 on the South African Birds and Renewable Energy Specialist Group's priority list. It is almost endemic to South Africa (a small population exists in Namibia) and is our national bird. It has the most restricted range of any of the 15 crane species worldwide. The population is estimated at a minimum of 25,000 birds (Taylor et al. 2015).

This species is highly susceptible to collision with overhead power lines, and more recently has been recorded as turbine collision fatalities from at least three operational wind farms in SA (Ralston-Paton et al 2019). At one of these wind farms, in the Overberg of the Western Cape, Blue Crane abundance on site is high, and the relatively low number of fatalities recorded indicates that the species may be reasonably adept at avoiding turbine collisions. No known fatalities have been recorded at Eastern Cape Wind Farms. They normally roost in large flocks (sometimes in the water of small dams) during the winter and in breeding season, the split of in pairs to breed in isolated kloofs.

At Fronteer, this species was recorded in relative low numbers by all data collection methods. Most important of these are flying birds, 18 records inside the rotor zone and seven outside during the 14-months of surveys (Table 3 and Figure 5). No large roost sites were recorded but they roost at night in pairs and small groups in or near small dams on the proposed site. Based on its' prevalence on site and low flight activity in combination with evidence that this species is fairly adept at avoiding turbine collisions but their habitat of leaving their night roost very early in the morning (still dark) make them prone especially to powerline collision.

10.1.4. Ludwig's Bustard

The Ludwig's Bustard is classified as Vulnerable by Taylor et al. (2015) and Near-threatened globally (IUCN 2017) and its population and range has decreased over the last few decades due to habitat destruction and disturbance.

The southern African population of this species is estimated at < 10 000 birds (Allan 2003, in Hockey et al, 2005). The arid or semi-arid areas of Eastern Cape, to our knowledge, has a relative moderate abundance.

Ludwig's Bustard could be susceptible to all five possible impacts: habitat destruction, disturbance and displacement, collision with turbine blades and power lines. In terms of collisions, this species is well known to be vulnerable to collision with overhead power lines (Shaw 2009). Although an overhead cable is very different to a wind turbine blade, this does give us cause to believe that they could be at risk of collision with the turbines. Ralston-Paton et al. (2017) recorded only one turbine fatality. It does remain a concern though until bustards and turbines can coexisted.

At Fronteer, it was recorded at relative low flight rates, only six flights inside the rotor zone and only two outside during the 14-month period. The habitat at this proposed site, has very little open areas (Karoo shrublands) therefore naturally, these birds are likely restricted by the high coverage of Thicket bushveld vegetation in the area. Their low abundance at Fronteer, is probably because this area has very little open areas (Karoo shrublands) therefore, naturally, these birds are likely restricted by the high coverage of Thicket bushveld vegetation in the area. The site has low importance for this species.

10.1.5. Southern Black Korhaan

Five Southern Black Korhaan (Vulnerable) mortalities have been recorded at South African wind farms (Ralston-Paton et al. 2017). The species was only recorded flying on site, 7 times in the 14-month period. This korhaan live and forage mainly by walking on the ground but it displays by making short, low display flights, also this korhaan is flushed reasonably easy in the approach and disturbance of humans. These probably makes them susceptible to turbine collisions. However, they seem not to be prone to the powerline conductor collisions (van Rooyen 2004).

At Fronteer, this species was only recorded flying on site, five times inside the rotor zone and 22 times outside during the 14-month period.

10.1.6. Secretarybird

Secretarybird is classed Globally as Endangered and Regionally as Vulnerable and is ranked number 13 on the South African Birds and Renewable Energy Specialist Group's priority list. These birds occur in low abundance in the study area at low density, and spend most of their time walking and foraging on the ground and breeding in low trees or bushes. However, they do display in spectacular courtship flights that might make them vulnerable to turbine collisions. They do, though, seem to select isolated / quiet areas for these display flights and in midday time and times of high visibility.

At Wind Garden, no flights were recorded inside or outside the rotor zone but at the start of the study, a pair was found regularly walking/foraging in the centre area of this WF site, and an old nest was located.

At Fronteer, no flights were recorded inside or outside the rotor zone but at the start of the study, a pair was found regularly walking/foraging in the centre area of the wind farm site. An old nest was found in the survey area during the baseline surveys. But no evidence was found of recent breeding.

10.1.7. Lanner Falcon

Lanner Falcon is classed Globally as Least Concern but regionally by Taylor et al (2015) as Vulnerable. It is ranked number 20 on the South African Birds and Renewable Energy Specialist Group's priority list. Two historic nest locations lie within the Choe Eastern block area, one 3.9km from the closest proposed Fronteer Wind Farm wind turbine, the other 10.1km, but no evidence was found of any birds currently breeding within the survey area. There were though occasional records of birds flying through the area, including at rotor height.

10.2. Assessment of the seven Impacts

The potential impacts of the proposed Fronteer Wind Farm site have been formally assessed and rated according to the criteria (supplied by Savannah and shown in Appendix A), presented in Tables 10.1 to 10.7.

10.2.1. Habitat loss during Construction

Based on the average of 0.5 hectares per turbine of land that will be used and using the maximum of 47 turbines to be constructed, other construction areas and the powerlines on the Fronteer Wind Farm, it is estimated that approximately 49.4ha of land will be lost to the turbines, hard standings, roads, switching station, electrical cables and powerlines from a total area of 2,689ha. Therefore 0.84% of the natural vegetation will be removed, which will consist mainly of Thicket vegetation (and less open habitat preferred by cranes and bustards). will have a LOW effect on small bush birds. While in terms of Priority Species that prefer open habitat, the impact will also be LOW, especially for three large terrestrial birds - Blue Crane, Secretarybird, Southern Black Korhaan and Ludwig's Bustard.

The Recommendations in Section 11 sets out the further mitigation measures required during construction. The list below summarises the significance of construction phase habitat loss for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out below:

Species	Before mitigation	After mitigation
Martial Eagle	Medium	Low
Verreaux's Eagle	Low	Low
Blue Crane	High	Medium
Ludwig's Bustard	Medium	Low
Southern Black Korhaan	Medium	Low
Lanner Falcon	Low	Low
Secretarybird	High	Medium

However, the loss of habitat can be reduced to all Priority Species to a LOW significance after the implementation of the mitigation including micro-positioning of the turbines (from Table 12.1).

Table 12.1 Impact Table for habitat loss of Priority Species during the construction.

Project phase: Construction (although it occurs during construction, it is permanent)			
Nature: Loss of habitat used by birds during Construction (removal of natural vegetation)			
	Without mitigation		With mitigation
Extent	Local	2	Local1
Duration	Permanent	5	Permanent5
Magnitude	Moderate	6	Low3
Probability	Probable	3	Probable3
Significance	Medium	39	Low27
Status (positive or negative)	Negative		Negative
Reversibility	YES – Areas disturbed during construction can be rehabilitated after construction and after decommissioning		
Irreplaceable loss of resources?	NO – rehabilitation of habitat is possible. There is extensive avifaunal habitat on the project site and beyond that which will remain intact and be available for use.		
Can impacts be mitigated?	YES –The total area of impact (and thus the severity rating) can be minimised		
Mitigation:			
<ul style="list-style-type: none">- A site specific Construction Environmental Management Plan (CEMP) must be implemented, which gives appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction of habitat;- Environmental Officers (EO) to oversee activities and ensure that the site-specific construction environmental management plan (CEMP) is implemented and enforced;- High traffic areas and buildings such as offices, batching plants, storage areas etc. should where possible be situated in areas that are already disturbed;- Existing roads and farm tracks should be used where possible;- The minimum footprint areas of infrastructure should be used wherever possible, including road widths and lengths;- No turbines should be constructed in no-go areas, while associated infrastructure should be avoided where possible in these areas;- Prior to construction, an avifaunal specialist should conduct a site walkthrough, covering the final road and power line routes as well as the final turbine positions, to identify any nests/breeding activity of sensitive species, as well as any additional sensitive habitats within which construction activities may need to be excluded; Should priority species nests be located, a protective buffer may be applied, within which construction activities may need to be restricted during the breeding season for that species;- Any clearing of large trees (>5m in height) especially stands of large alien trees (e.g. Blue Gum or Pine) on site should be approved first by an avifaunal specialist. Before, clearing, the location and description of the trees should be provided to the specialist, who may request the EO to inspect the trees for any nests prior to clearing.			

- The construction Phase EO, the onsite Environmental Manager, and the client's representative on site (e.g. the resident engineer) are to be trained to identify Red Data and priority bird species, as well as their nests. If any nests or breeding locations for this species are located, an avifaunal specialist is to be contacted for further instruction; and
- Following construction, rehabilitation of all areas disturbed (e.g. temporary access tracks and laydown areas) must be undertaken and to this end a habitat restoration plan is to be developed by a specialist and included within the CEMP.

Residual Impacts:

The size and effect of habitat loss will be LOW collectively for all species after the implementation of the required mitigation measures, the micro-positioning of turbines and new powerline tower sites, and using existing roads.

10.2.2. Disturbance of birds during construction

The 2.5km and 1.5km buffers applied around the Martial Eagle and Verreaux's Eagle nests respectively to reduce turbine collision risk must be adhered to during construction as well. This will limit disturbance to these eagles near their nests. The placement of infrastructure outside these buffer areas will reduce the significance of this impact. However, it is likely that all Priority Species will avoid areas under construction (including Blue Crane, Southern Black Korhaan, Ludwig's Bustard, Martial Eagle, Verreaux's Eagle, Lanner Falcon and Secretarybird). The Recommendations in Section 13.2 sets out the further mitigation measures required during construction. The list below summarises the significance of construction phase disturbance for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.2:

Species	Before mitigation	After mitigation
Martial eagle	Medium	Low
Verreaux's eagle	Low	Low
Blue crane	High	Medium
Ludwig's bustard	Medium	Low
Southern Black Korhaan	Medium	Low
Lanner Falcon	Low	Low
Secretarybird	High	Medium

Based on the above, this impact will be MEDIUM after the implementation of mitigation at this proposed site during Construction period (from Table 12.2) though this will be a short-term impact.

Table 12.2 Impact Table for disturbance of Priority Species during construction.

Impact phase: Construction				
Nature: Disturbance and Displacement of Birds				
	Without mitigation		With mitigation	
Extent	Local	2	Local	2
Duration	Short-term	2	Short-term	2
Magnitude	Moderate	6	Low	4
Probability	Probable	4	Probable	4
Significance	Medium	40	Medium	32
Status (positive or negative)	Negative		Negative	
Reversibility	PARTIALLY – birds disturbed during construction may return to their activities after completion of construction.			
Irreplaceable loss of resources?	POSSIBLE – Disturbance and potential displacement of birds may impact breeding and therefore could impact on the population of a species.			
Can impacts be mitigated?	PARTIALLY– Some disturbance is inevitable with the activities associated with construction.			
Mitigation:				
<ul style="list-style-type: none">- A site specific Construction Environmental Management Plan (CEMP) must be implemented, which gives appropriate and detailed description of how construction activities must be conducted. Environmental Officers to oversee activities and ensure that the site-specific construction environmental management plan (CEMP) is implemented and enforced;- Prior to construction, the avifaunal specialist should conduct a site walkthrough, covering the final infrastructure (e.g. road, substation, offices, turbine positions etc.) to identify any nests/breeding/roosting activity of sensitive species, as well as any additional sensitive habitats. The results of which may inform the final construction schedule, including abbreviating construction time, scheduling activities around avian breeding and/or movement schedules, and lowering levels of associated noise. Following the specialist site walkthrough, any additional sensitive zones and no-go areas (e.g. nesting sites of Red Data species) are to be designated by the specialist who should advise on an appropriate buffer, within which construction activities may not occur during key breeding times;- The construction Phase EO, the onsite Environmental Manager, and the client’s representative on site (e.g. the resident engineer) must be trained by an avifaunal specialist to identify the potential priority species and Red Data species as well as the signs that indicate possible breeding by these species. The EO must, 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 (e.g. in Toolbox talks) 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 an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed;				

- During the construction phase, an avifaunal specialist must conduct a nest survey/exploration of the WEF site. This should be done during and after, the breeding season (i.e. approximately in April and again in June) of large Eagles (Martial and Verreaux's eagles). The aim will be to locate any nest/roost sites not yet found, so that these may continue to be monitored during the construction and operation phases, along with the monitoring of already identified nest/roost sites (see point below);

- Appoint a specialist to design and conduct monitoring of the breeding of raptors at the various nests identified to date as well as any additionally located nests (see point above). This monitoring can be combined with the exploration described above and should be conducted on two occasions (i.e. approximately in April and again in June) across each calendar year, during construction. The aim will be to monitor any disturbance to or displacement of the breeding birds during construction.

Residual Impacts:

It is highly likely that most priority species will be temporarily disturbed and displaced from the development area during the construction activities, due to the noise and activity. The significance will remain at a MODERATE level collectively for all priority species after mitigation.

10.2.3. Turbine collision fatalities during Operation

Human caused fatalities of Red-listed or otherwise threatened bird species are always a cause for concern and should be avoided as far as possible. Estimated fatalities are therefore predicted and a cause for concern. There are currently no established thresholds for acceptable impacts on bird species in South Africa. The Collision Risk modelling for six Priority species at risk of collision (i.e. those observed flying through the collision risk zone at rotor height), Blue Crane, Martial eagle, Verreaux's eagle, Ludwig's bustard, Southern Black bustard and Lanner Falcon is given in Table 9. Secretarybird was not recorded flying through the collision risk zone at rotor height, no the collision risk would be predicted as zero (and no modelling was undertaken). Its risk has been assessed in Table 12.3 assuming a worst case that it did return to breed in the area.

The Recommendations below set out the further mitigation measures required during operation of the wind farm. The list below summarises the significance of operation phase collision risk for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.3:

Species	Before mitigation	After mitigation
Martial eagle	Medium	Low
Verreaux's eagle	Low	Low
Blue crane	High	Medium
Ludwig's bustard	Medium	Low
Southern Black Korhaan	Medium	Low
Lanner Falcon	Low	Low
Secretarybird	High	Medium

The overall significance for all seven Priority species, can LOW after the implementation of mitigation (from Table 12.3), and if the Verreaux's Eagle rocky habitat and the grassland patch used by Blue Crane are avoided by the turbines as far as possible.

Table 12.3 Impact for Priority species mortality caused by collision with wind turbine blades.

Impact phase: Operation				
Nature: Bird mortality caused by collision with wind turbine blades				
	Without mitigation		With mitigation	
Extent	Local	3	Local	3
Duration	Permanent	5	Permanent	5
Magnitude	Moderate	6	Low	5
Probability	Probable	4	Probable	2
Significance	Medium	56	Low	26
Status (positive or negative)	Negative		Negative	
Reversibility	PARTIALLY – Bird fatalities caused by collisions with turbines are irreversible. However local populations may recover if the occurrence of deaths is low.			
Irreplaceable loss of resources?	POSSIBLY – Collisions with turbines cause bird fatalities, which could significantly impact local and/or regional populations of certain species.			
Can impacts be mitigated?	PARTIALLY – The probability of the impact can potentially be reduced through informed placement of turbines.			
Mitigation:				
<ul style="list-style-type: none">- The minimum number of turbines should be constructed to achieve the required MW output. It is preferable to have a reduced number of turbines with larger rotor compared with more turbines with a smaller rotor;- Turbines must not be constructed within any designated No-Go Areas. The turbine blade should not protrude into these areas, and therefore the bases should be constructed with sufficient distance from these areas to prevent this;- The hierarchy of sensitivity zones identified should be considered where possible with preferential placement of turbines in areas with no sensitivity score, followed by low sensitivity, medium sensitivity and medium-high sensitivity;- Develop and implement a carcass search programme for birds as a minimum during the first three years of operation followed by year 5, 10, 15, 20 and 25, in line with the applicable South African monitoring guidelines;- Develop and implement a minimum 12-month post-construction bird activity monitoring program that mirrors the pre-construction monitoring surveys completed by Ecology Consulting/ECDC and is in line with the applicable South African post-construction monitoring guidelines. This program must include thorough and ongoing nest searches and nest monitoring. The results of this monitoring and the carcass searchers should advise the need for any additional ongoing activity monitoring or nest surveys beyond the 12-month period;				
a) increase turbine blade visibility				
b) Onsite and off-site habitat management				
c) implement a shut-down-on-demand system				

Residual Impacts:

The impact is likely to persist for the operational life-time of the project. Implementation of the proposed mitigation measures should reduce the probability and severity of the impact on priority species to such an extent that the overall significance of residual impact should be reduced to LOW.

10.2.4. Disturbance and Displacement of birds during operations

The indications from operational wind farms in South Africa are that this impact may be of fairly low importance, although it is acknowledged that a longer term or more detailed means of measuring this impact may be required. Disruption of flight paths and local movement patterns of Priority Species during operation of the wind farm has also been considered. Birds might use more energy to get to their normal feeding grounds by flying around the wind farm.

For Verreaux's Eagle, there would be no range loss for any territory resulting from the operation of the Frontier wind farm, as their range centres lie more than 2.9km from the Frontier site.

For Martial Eagle, there would be a 0.3% range loss from the confirmed south-west territory for complete displacement to 500m for the 38-turbine layout, and an 0.02% loss assuming complete displacement to 250m from the turbines. For the other territory to the north-east of the site, there would be a 19.3% loss from the confirmed SW territory for complete displacement to 500m, and a 16.2% loss assuming complete displacement to 250m from the turbines (Table 10).

The Recommendations below set out the further mitigation measures required during operation of the wind farm. The list below summarises the significance of operation phase disturbance for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.4:

Species	Before mitigation	After mitigation
Martial Eagle	Medium	Low
Verreaux's Eagle	Low	Low
Blue Crane	Medium	Medium
Ludwig's Bustard	Medium	Low
Southern Black Korhaan	Medium	Low
Lanner Falcon	Medium	Low
Secretarybird	Medium	Medium

The overall significance of the impact will be LOW after the implementation of mitigation for all Priority species during Operation.

Table 12.4 Impact for the displacement due to disturbance of Priority Species during Operation.

Impact phase: Operation			
Nature: Displacement due disturbance of birds during Operation			
	Without mitigation		With mitigation
Extent	Local	3	Local 2

Duration	Permanent	5	Permanent	5
Magnitude	Moderate	5	Low	2
Probability	Probable	3	Probable	3
Significance	Medium	39	Low	27
Status (positive or negative)	Negative		Negative	
Reversibility	NO: While it is expected that most species will continue to use the wind farm area, some species might do so in reduced densities, primarily due to the fragmentation of the habitat.			
Irreplaceable loss of resources?	YES: While it is expected that most species will continue to use the wind farm area, some species might do so in reduced densities, primarily due to the fragmentation of the habitat.			
Can impacts be mitigated?	YES: To some extent by ensuring that no impacts occur outside the immediate footprint			
Mitigation: The recommendations of the Ecological Impact Assessment must be strictly adhered to. Where possible existing access roads should be used and upgraded during the construction while the construction of new roads should be kept to a minimum. Following construction, rehabilitation of all areas disturbed (e.g. temporary access tracks and laydown areas) must be undertaken and to this end a habitat restoration plan is to be developed by a rehabilitation specialist.				
Residual Impacts: Disturbance will remain an impact for the duration of the operational life-time of the facility. However, the overall impact is estimated to be of a LOW significance for the ten Priority species after the implementation of the mitigation measures.				

10.2.5. Power line impacts on birds (electrocution)

Birds can collide with power line conductors/wires or get electrocuted on overhead power line poles/structures (although unlikely because of the large pole size of 132kV powerlines) or on the substation and switching gear during the operation of the Fronteer Wind Farm. The stretch of new 132kV power line will be only 1km with the collector substation and the switching station located on the wind farm site. Large terrestrial birds are more prone to colliding with power line conductors (assessed in Table 12.6) while large raptors are more likely to get electrocuted on powerline poles and structures.

The Recommendations in Section 13.6 sets out the further mitigation measures required for the powerlines. The list below summarises the significance of operation phase powerline electrocution risk for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.5:

Species	Before mitigation	After mitigation
Martial Eagle	Low	Low

Verreaux's Eagle	Low	Low
Blue Crane	High	Medium
Ludwig's Bustard	High	Medium
Southern Black Korhaan	Medium	Low
Lanner Falcon	Low	Low
Secretarybird	High	Medium

The new power line and pole structures will result in the Electrocution impact to be of LOW significance after the implementation of mitigation for all the perching Priority species (Verreaux's Eagle and Martial Eagle) during Operation.

Table 12.5 Assessment of Electrocution of Priority Species on power lines during operations.

Impact phase: Operation			
Nature: Direct mortality of priority species due to electrocution associated with the power line at the wind farm development area.			
	Without mitigation		With mitigation
Extent	Local	3	Local2
Duration	Permanent	5	Permanent5
Magnitude	Medium	3	Low2
Probability	Probable	3	Probable3
Significance	Medium	33	Low 27
Status (positive or negative)	Negative		Negative
Reversibility Irreplaceable loss of resources? Can impacts be mitigated?	Low		Low
	Yes		No
	Yes		
Mitigation: - Placement of electrical infrastructure should consider avifaunal sensitivity zones and avoid areas of higher sensitivities where possible (a walk-through by an avifaunal specialist); - All new internal power lines linking the wind turbine generators to each other on site must be placed underground where technically and environmentally feasible. Certain spans can only be above ground if it is impossible and completely unfeasible to bury them or if there is a reasonable other environmental aspect present which prevents them being buried (e.g. a sensitive wetland area); - Any new overhead power lines must be of a design that minimises electrocution risk by using adequately insulated 'bird friendly' monopole structures, with clearances between live components and possible bird perches (e.g. cross arms) of 1.8m or greater. Each pylon should be fitted with a safe bird perch; and			

- Develop and implement a carcass search programme for birds during the first two years of operation, in line with the South African monitoring guidelines (Jenkins et al. 2015). This program must include monitoring of overhead power lines.

Residual Impacts:

The potential for an electrocution risk will persist as long as the lines are operational, but it can be effectively eliminated at the onset, if bird-friendly hanging insulators and raptor-protectors pole structures are used. Electrocution of Priority species will be of LOW significance after the implementation of all the required mitigation measures.

10.2.6. Power line collision impacts

As from above, the Collision of birds with power line conductors can occur, and two of the Priority species are prone to collide with powerlines (Blue Crane and Secretarybird). Blue Crane is particularly susceptible to powerline collisions therefore rated as HIGH in score below.

The Recommendations in Section 13.6 sets out the further mitigation measures required for the powerlines. The list below summarises the significance of operation phase powerline collision risk for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.6:

Species	Before mitigation	After mitigation
Martial eagle	Low	Low
Verreaux's eagle	Low	Low
Blue crane	High	Medium
Ludwig's bustard	High	Medium
Southern Black Korhaan	Medium	Low
African fish-eagle	Low	Low
Secretarybird	High	Medium

However, the Collision with powerlines will be of LOW significance for all species during Operation after the implementation of mitigation (Table 12.6).

Table 12.6 Assessment of Priority Species collision on overhead power line during operation.

Impact phase: Operation				
Nature: Direct mortality of priority species due to collisions with the grid connection power line at the wind farm development area				
	Without mitigation		With mitigation	
Extent	Local	3	Local	2
Duration	Permanent	5	Permanent	5
Magnitude	Medium	4	Low	2
Probability	Probable	4	Probable	3

Significance	Medium	48	Low	27
Status (positive or negative)	Negative		Negative	
Reversibility	Low		Low	
Irreplaceable loss of resources?	Yes		No	
Can impacts be mitigated?	Yes			
Mitigation: <ul style="list-style-type: none">- All new internal power lines linking the wind turbine generators to each other on site must be placed underground where technically and environmentally feasible. Certain spans can only be above ground if it is impossible and completely unfeasible to bury them or if there is a reasonable other environmental aspect present which prevents them being buried (e.g. a sensitive wetland area);- Placement of electrical infrastructure should consider avifaunal sensitivity zones and avoid areas of higher sensitivities where possible; - If some spans are to be above ground, where possible place new overhead power lines adjacent to existing power line or linear infrastructure (e.g. roads and fence lines);- Attach appropriate marking devices or bird flight diverters (BFDs) on all new overhead power lines on the WIND FARM to increase visibility. The advice of a specialist should be sought regarding the type, placement and spacing of the BFDs to be used and the type of pylon structure to be used; and- Develop and implement a carcass search programme for birds during the first two years of operation, in line with the South African monitoring guidelines (Jenkins et al. 2015). This program must include monitoring of overhead power lines.				
Residual Impacts: <p>The application of BFDs should greatly reduce the collision impact but will not totally eliminate the risk. The collision risk will be LOW after the implementation of all the required mitigation measure.</p>				

10.2.7. The disturbance during the decommissioning phase

Disturbance and displacement of Priority Species during the decommissioning of the wind farm turbines and the power lines and other infrastructure will be short-term and it is likely to have a LOW significant impact on the birds after the implementation of mitigation.

The Recommendations section following sets out the further mitigation measures required during decommissioning of the wind farm. The list below summarises the significance of decommissioning phase disturbance for each priority species, before and after mitigation, which has been used to inform the overall assessment of this impact set out in Table 12.7:

Species	Before mitigation	After mitigation
Martial Eagle	Medium	Medium
Verreaux's Eagle	Low	Low
Blue Crane	High	Medium
Ludwig's Bustard	Medium	Low
Southern Black Korhaan	Medium	Medium

Lanner Falcon	Low	Low
Secretarybird	High	Medium

Table 12.7 Disturbance of Priority Species due to Decommissioning of Turbines and power lines.

Impact phase: Decommissioning				
Nature: Disturbance and displacement of birds				
	Without mitigation		With mitigation	
Extent	Local	3	Local	3
Duration	Short-term	2	Short-term	1
Magnitude	Moderate	4	Low	3
Probability	Probable	4	Probable	3
Significance	Medium	36	Low	21
Status (positive or negative)	Negative		Negative	
Reversibility	Yes but it will be temporary			
Irreplaceable loss of resources?	PARTIALLY– Some disturbance is inevitable with the activities associated with decommissioning.			
Can impacts be mitigated?	YES: To some extent, however the impact will be negated naturally after the closure phase.			
Mitigation:				
- A site specific Environmental Management Plan must be implemented for the decommissioning phase.				
- Environmental Officers to oversee activities and ensure that the site specific EMP is implemented and enforced;				
- The appointed Environmental Officer (EO) must be trained by an avifaunal specialist to identify the potential priority species and Red Data species as well as the signs that indicate possible breeding by these species. The EO 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 (e.g. in Toolbox talks) 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), activities within 500 m 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.				
Residual Impacts:				
The dismantling activities associated with all wind farm infrastructure (turbines and powerlines) could result in the short-term disturbance and displacement of priority species from the site. After the implementation of the proposed mitigation measures it will be of LOW significance for all Priority species.				

10.3. Cumulative Impacts of wind energy facilities on birds in the wider area

“Cumulative Impact”, in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

Using a 30km radius, Fronteer will be 6km away from one operational wind farm, Waainek, to the southeast and approximately 9km away from the authorized but not yet operational Albany wind farm to the north-east, and neighbouring to the east, the proposed Fronteer wind farm. Figure 28 shows a map of the known wind farms within a 30km radius of Fronteer.

Available operational monitoring reports from these wind farms were obtained from BLSA and were reviewed. The Waainek wind farm 12-month Post-construction avifaunal report (Sholto-Douglas et al. 2018) was obtained and considered. However no cumulative bird assessment was done for the Albany wind farm, according to its Pre-construction Avifaunal report (Smallie 2020).

The Waainek report shows small changes on bird abundance and species composition and recorded relatively low mortalities but highlight that mortalities of Jackal buzzards were of concern and could be the result that this species may be attracted to turbines to scavenge on small bird carrion underneath turbines.

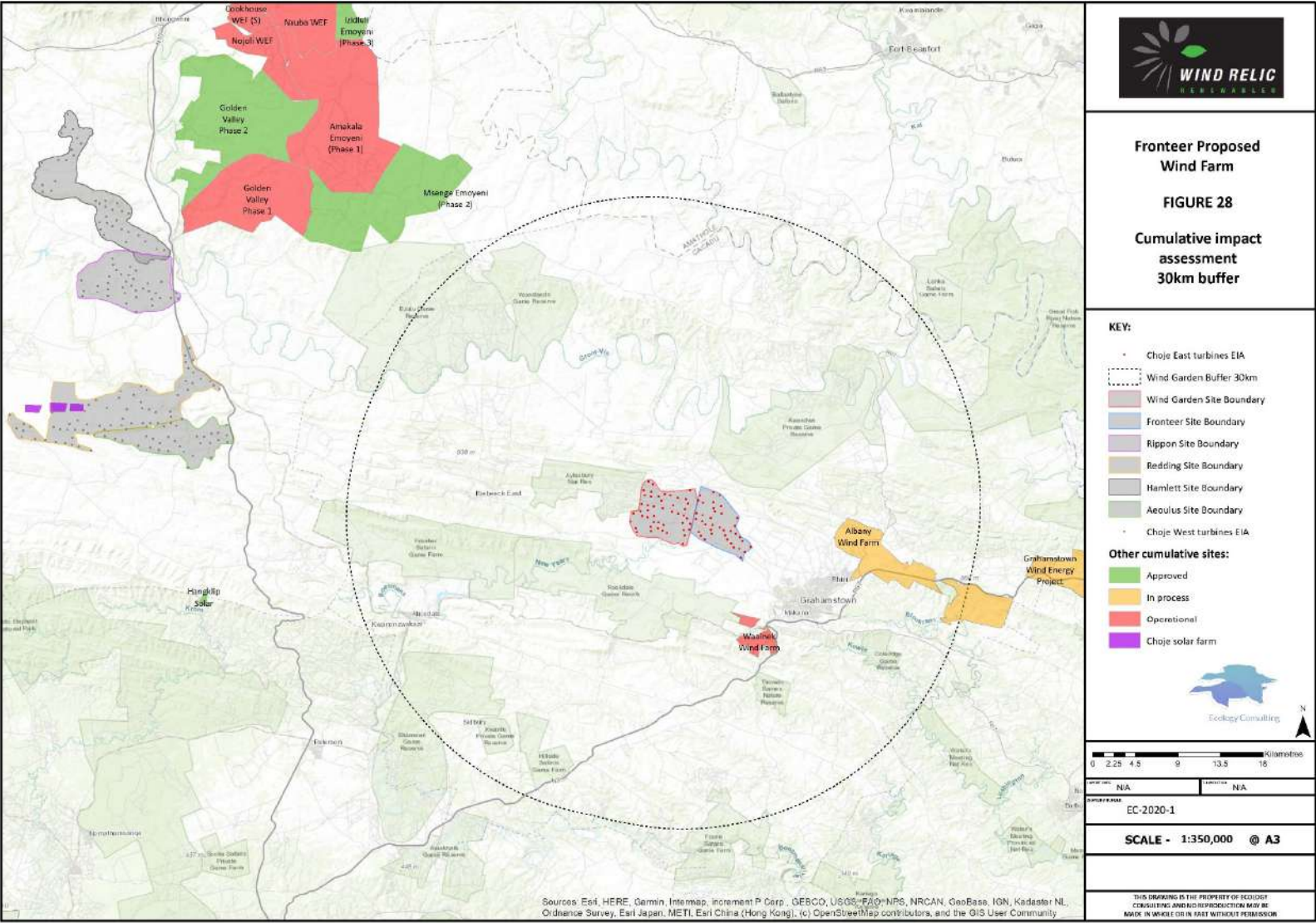
Available operational monitoring reports from several additional wind farms to the north of Fronteer were obtained from BLSA and were reviewed:

- Cookhouse 1 – Smallie May 2016 post-construction;
- Nojoli wind farm – Smallie pre-construction 2021, April 2018, October 2019, December 2020 post-construction;
- Amakhala-Emoyeni – Smallie September 2017, December 2018, November 2019 – post-construction;
- Highlands – Pearson July 2018 pre-construction;
- Golden Valley 1 and 2 - pre-construction.

The fatalities of Species of Conservation Concern species found under turbines and powerlines from the available post-construction data/reports at the wind farms to the north of Fronteer are summarised in Table 12.8 below. The results are variable, with no Species of Conservation Concern collisions recorded in one year of monitoring at the Cookhouse wind farm, but higher numbers at Amakhala-Emoyeni and Nojoli, with notable numbers of Cape Vulture collisions in particular. Both the Amakhala-Emoyeni and Nojoli wind farms are located closer to the main Cape Vulture roost at Aggieskloof, so the collision rate at Fronteer would be expected to be lower in the long-term. However, the potential for higher numbers of collisions at Fronteer in at least some years remains, and the overall population impact will be higher if collisions at these other sites continues at the rates reported here. This emphasises the importance of the Ornithological Mitigation Plan that is being proposed for the Fronteer site to ensure that it does not add significantly to this cumulative mortality, if the vultures did return to the site in future years. Numbers of collisions of other species of conservation concern at these operational wind farms were lower, so the cumulative impact would be likely to be of lesser concern.

Table 12.8. Numbers of Species of Conservation Concern collisions at operational wind farms considered in the Frontier cumulative assessment.

Site	No of Turbines	No. years monitoring	Black Harrier	Blue Crane	Cape Vulture	Martial Eagle	Secretary -bird	Southern Black Korhaan
Amakhala Emoyeni	56	3	1	2	7	1	0	1
Nojoli	44	3	0	2	10	0	2	0
Cookhouse	66	1	0	0	0	0	0	0



10.3.1. Cumulative Assessment

The cumulative effect of proposed Fronteer development along with the actual and predicted impacts of the operational wind farms mentioned above and future impacts of the proposed Choje wind farms and other proposed wind farms in the area, has the potential to affect various bird species at a higher significance than the impacts of the proposed Fronteer wind farm alone. Table 10 lists the annual collision risks for the Key species that may be impacted cumulatively. Of these, Blue Crane, Martial Eagle and Verreaux's Eagle are of primary concern (from the cumulative collision risk).

No specific guidance or assessment methodology is currently available in South Africa in relation to the determination of levels of predicted additional mortality that should be considered significant, or the appropriate spatial scale at which population impacts should be assessed.

In the case of the predicted collision risks from the Fronteer Wind Farm, in the absence of mitigation the possibility of significant numbers of collisions cannot be ruled out. Mitigation measures must be implemented to minimise the risk of collision to Martial Eagle and Verreaux's Eagle in particular, so that, as well as avoiding potentially significant impacts from the wind farm on its own, the contribution of the Fronteer Wind Farm site to the overall cumulative risk will be reduced.

Table 12.9 summarises the assessment of the cumulative impacts of all these wind farms for the ten species in the CRM. This then also include, during Construction - Habitat loss and Disturbance, and during Operation – Disturbance/Range Loss, Collision with powerlines and Electrocutation on powerline poles.

In conclusion, if all operational and proposed facilities are considered and all appropriate and effective mitigation as outlined by their respective specialists, and if all mitigation measures outlined in this report are implemented for the proposed Fronteer development, the cumulative impact after mitigation (Table 12.9) is likely to have a MEDIUM significance.

Table 12.9 Cumulative Impact Table.

Nature:			
Cumulative impact of all impacts on avifauna at all operational and proposed wind farms in the region.			
	Overall impact of the proposed project considered in isolation		Cumulative impact of the project and other projects in the area
Extent	Regional	4	Regional 4
Duration	Permanent	5	Permanent 5
Magnitude	Moderate	3	Moderate 3
Probability	Probable	2	Probable 3
Significance	Low	24	Medium 36
Status (positive or negative)	Negative		Negative
Reversibility	Low		Low
Irreplaceable loss of resources?	Yes		Yes
Can impacts be mitigated?	Yes		Yes
Mitigation:			
All mitigation measures listed above and recommended for other projects listed above must be adhered to.			

The applicant and operational neighbouring projects should proactively collaborate in turbine collision research and mitigation if incidents on Priority species occur. Data must be shared, and research efforts co-ordinated to reduce mortalities in the region of the species above, and where applicable and agreed, effort must be made to assist in funding of such research.

Mitigation for cumulative impacts warrant a cumulative approach to mitigation to achieve maximum effectiveness. In this area, Wind Garden and Fronteer would be two wind farms if authorised, therefore an opportunity exists to initiate a Stewardship programme. We recommend that the companies/wind farm owners should collaborate for the purpose of further research and mitigation into the impacts of wind farms on priority species in the Grahamstown/ Cookhouse areas.

Residual Impacts:

Although the assessed significance is of MEDIUM significance, if all the mitigation measures proposed for the various renewable projects are strictly implemented, the cumulative impacts of these developments, including the proposed wind farm, can be even more reduced.

Conclusion on Cumulative Impacts

In conclusion, Table 12.10 shows the predicted Cumulative risk categories assigned to each of the ten Cumulative Priority species for the seven potential impacts if both wind farms (Wind Garden and Fronteer) are approved and operational, before and after all the recommended mitigation measures are implemented.

Table 12.10 Cumulative risks for the two Choje Eastern block wind farms assigned to the cumulative priority species from the seven impacts, before and after mitigation

Cumulative risk categories for Wind Garden and Fronteer WFs from the seven impacts for each Priority species - before and after mitigation from Table 9 - for all these species an annual Collision Risk (CRM) were calculated													
Species	Habitat loss Construction		Disturbance Construction		Powerline				Disturbance Operation		Total Annual Collision Risk	Collision Risk	
	before	after	before	after	before	after	before	after	before	after		before	after
Martial eagle	mod	low	mod	mod	low	low	mod	low	mod	mod	0.19	high	mod
Verreaux's eagle	low	low	low	low	low	low	mod	low	low	low	0.12	mod	low
Blue crane	mod	low	mod	mod	high	mod	low	low	mod	low	0.52	high	mod
Ludwig's bustard	mod	low	mod	low	high	mod	low	low	mod	low	0.05	high	mod
Southern Black Korhaan	low	low	low	low	low	low	low	low	low	low	0.05	low	low
Denham's bustard	low	low	low	low	mod	low	low	low	low	low	0.07	low	low
Lanner falcon	low	low	mod	low	low	low	low	low	low	low	0.08	low	low
Black harrier	low	low	mod	low	low	low	low	low	mod	low		low	low

11. RECOMMENDATIONS

The required and recommended measures to mitigate ornithological impacts of the Fronteer wind farm are set out below. These have been further developed into an Ornithological Mitigation Plan that is included in Appendix F.

11.1. Mitigation of the Construction Phase

The developer has committed to the production of a Construction Method Statement that would be agreed with BLSA and other relevant stakeholders before construction commences and would follow industry best practice. Additionally, an Ornithological Mitigation Plan is being developed through consultation with stakeholders to refine and implement the required mitigation measures set out in this assessment (see Appendix F).

Designated working areas, storage areas and access routes would be identified at the commencement of the construction phase. The proposed works will be phased so that access tracks/roads are constructed early in the construction programme. Vehicular access would be restricted to designated routes throughout construction and operation as far as possible, thereby minimising potential disturbance of birds.

Several key species potentially vulnerable to construction disturbance were recorded during the surveys, including Verreaux's Eagle, Martial Eagle, Blue Crane, Ludwig's Bustard, Southern Black Korhaan and Secretarybird. These should not be disturbed at any nest site during breeding, particularly during the construction phase of the wind farm. Further surveys for these will therefore be undertaken immediately prior to construction if construction were planned for the relevant breeding periods. If any are found then potentially disturbing activities would be suspended until the breeding had been completed within an appropriate zone (dependent on the location of the birds and the species involved, to be agreed with BLSA).

Where a disturbance impact on nesting birds is possible, site groundworks (i.e. laying of site tracks, laying out of the temporary construction compound and excavation of the turbine foundations and footings for the substation and meteorological mast) will be scheduled to take place where possible outside the breeding period. Where works affecting habitats that could be used by nesting birds must take place during the breeding season, they will only be carried out following an on-site check for nesting birds by an experienced ecologist. If this indicates that no nesting birds are likely to be harmed by the works, then the works will proceed.

If nesting birds are found to be present, work will not take place in that area until the adult birds and young have left the nest. A protection zone will be clearly marked around the nest site to prevent accidental disturbance or damage.

It is proposed to clearly mark the extent of the working area to minimise the risk of machinery encroaching onto adjacent habitat. It is important to protect habitats adjacent to the working area, since they might be used by nesting birds.

11.2. Mitigation of the Operation Phase

Mitigation will be implemented to ensure that significant bird collisions do not occur at this site. One option for such measures would be to set a threshold level of mortality (determined from a post-construction monitoring programme) that would trigger specific actions. Such an approach would depend on being able to set a threshold that had a robust scientific base (and hence would require more data than are currently available on the local population status/dynamics).

An alternative, more precautionary approach, has been adopted in this assessment and agreed with the developer, applying a hierarchy of measures to reduce impact magnitude: design mitigation to avoid areas of higher flight activity, and mitigation measures to be applied on a precautionary basis at the outset of operation of the wind farm rather than waiting for collisions to occur. This will include deploying single back blades in amber zones closer to active eagle nests to increase visibility, and measures to increase the

attractiveness of areas outside the wind farm through habitat enhancement. As a further guarantee that significant bird collisions will not occur, a shutdown on demand system will also be implemented.

Turbine shutdown on demand: curtailment of the operation of wind turbines could potentially be a useful mitigation measure to reduce collision risk but is often uneconomic. Recent developments of schemes that have very limited shutdown over short periods has made the implementation of such schemes more viable, and there are now several in operation globally (mainly in southern Europe). These rely either on direct human observers at key risk periods and/or automated detection systems based on radar or video monitoring. Such a system could be implemented at the Fronteer Wind Farm, if required, to provide a back-up response should the number of collisions actually approach a level that could be significant. Given the low numbers of predicted collisions, the likelihood of such measures being required is considered to be low. Notwithstanding this, the developer has committed to implement a shutdown on demand system, in order to ensure that collision risk is minimised, that a significant number of collisions of any species does not occur and that the Fronteer site does not contribute to any significant cumulative collision risk. Further details of the proposed scheme are provided in Appendix F.

Habitat Management (on-site): the raptor food resource must not become more attractive within the wind farm site, drawing foraging birds into the site, as this would increase collision risk. For instance, during access track/road construction, there may be periods of time where imported or excavated aggregate is stockpiled forming potentially attractive habitat for Rock Hyrax. During construction of the wind farm all mounds of aggregate or rocks which could serve as hyrax habitat should be removed prior to the commencement of operation of the turbines and through the operation phase of the wind farm (following BLSA 2017 guidance). In addition, the proposed turbine bases should not serve as a refuge for small mammals, and therefore the turbines themselves will not create attractive habitat for potential prey species such as a hyrax. This should form part of a specific Ornithological Mitigation Plan (see Appendix F for initial draft of this document, which is to be developed and finalised in consultation with stakeholders including BLSA).

Habitat Management (off-site): in order to enhance the mitigation measures proposed above, a management programme should be implemented to enhance the food resources away from the wind farms, to reduce eagle flight activity within those wind farms and hence further reduce collision risk. Management measures that could improve raptor prey populations and habitat over a large area that, if managed appropriately, could deliver a net gain to the local raptor populations. Vegetation management to open up areas for Verreaux's Eagle to hunt (such as removal of areas of Acacia karroo trees/thickets along the river bends/horseshoes) would make dassies more huntable, for example. A specific management plan for the whole Choke area must be drawn up by a suitably qualified ecologist employed by the wind farm developer and the scheme should be agreed with BLSA. Measures to enhance local crane and bustard populations must also be implemented. Further details are provided in the Ornithological Mitigation Plan in Appendix F.

Increased turbine visibility: given the results of the Smøla study (May et al. 2020) that found a significant reduction in White-tailed Eagle collisions following painting of one of the three rotor blades black, it is proposed that all turbines within the amber caution zones (within 3km of Verreaux's Eagle, and 5km of Martial Eagle nests) should deploy this mitigation measure, and paint a single blade black during construction. Given this is a novel mitigation, a post-construction monitoring scheme should be implemented to determine its effectiveness.

Additionally, undergrounding of overhead lines in areas used by bustards, cranes and eagles should be considered (e.g. within the red zones and caution areas), or, where that is not possible, measures implemented to ensure that any overhead lines are marked with bird flight diverters to reduce collision risk.

11.3. Mitigation of the Decommissioning Phase

In order to ensure that none of the decommissioning effects on the site's ornithological interest are significant, the same mitigation measures must be implemented as for the construction phase of the development.

11.4. Post-construction Monitoring

Ongoing monitoring during and after completion of construction must be undertaken as part of an ornithological management plan, and to inform ornithological mitigation measures through the lifetime of the wind farm. Additional baseline data will help better understand the risk at those specific locations and inform the management of those risks. This must follow the BLSA Best Practice Guidelines (Jenkins *et al.* 2015). A detailed post-construction monitoring programme will be an essential and integral part of the mitigation package, to ensure that it both delivers the required results and is managed in the optimal way. This will include:

- comprehensive collision checks (on at least a weekly basis for an agreed sample of at least 25% of turbines, including all those within amber zones);
- monitoring of key species flight activity in/around the wind farm;
- key species nest site and breeding success;
- large terrestrial bird vehicle transects;
- Monitoring of flight behaviour in relation to single black blade painting;
- Effectiveness of Shutdown-on-Demand, including recording of near-misses and 'false positive' shutdown events;
- Monitoring of effectiveness of habitat management measures;
- Detailed tracking of Martial Eagles and Verreaux's Eagles, with specific tracking programmes using appropriate technology (e.g. fitting of GPS tags) to better understand flight behaviour in proximity to wind turbines, and also to test and develop the spatial modelling undertaken as part of the baseline assessment work.

The operational phase bird collision monitoring should follow BLSA Best Practice Guidelines (Jenkins *et al.* 2015). A core area of a radius equal to at least 75% of the height to blade tip around each turbine should be carefully searched on foot. Sectors around the turbine should be slowly searched, taking particular care to search any taller clumps of vegetation, rocks and openings of animal burrows. The precise location of any dead birds found should be recorded and mapped (by reference to the distance and direction to the nearest wind turbine, and using a GPS). All carcasses should be photographed as found then placed in a plastic bag, labelled as to the location and date (turbine number, distance and direction from turbine base), and preserved (refrigerated or frozen) until identified. Feather spots (e.g., a group of feathers attached to skin) and body parts should also be collected. For all casualties found, data recorded should include species, sex, age, date and time collected, location, distance and direction (degrees) to nearest turbine, condition, and any comments regarding possible causes of death. The condition of each carcass found should be recorded using the following condition categories:

- Intact - carcass that is completely intact, is not badly decomposed, and shows no sign of being fed upon by a predator or scavenger.
- Scavenged - entire carcass that shows signs of being fed upon by a predator or scavenger or a portion(s) of a carcass in one location (e.g., wings, skeletal remains, legs, pieces of skin, etc.).
- Feather Spot - 10 or more feathers at one location indicating predation or scavenging.

A sample of 50 dead birds (e.g. dark-feathered chickens) should be obtained in order to study the rate of carcass removal and to test observer search efficiency, repeated four times annually. These should be placed within the search area at intervals through the study by someone independent of the carcass searcher, at precise recorded locations (mapped in relation to distance and direction from the wind turbines), and marked appropriately (e.g. with coloured tape) to identify them as experimental birds. They should then be recorded by the observer on all subsequent visits, noting their precise location (distance and direction from nearest wind turbine) and condition, and left in place on site until they disappear. The amount of scavenger activity should inform the survey frequency, but an initial programme of weekly visits is recommended as a starting point.

11.5. Mitigation of Power line collision and electrocution

Mitigation of power line impacts will require design measures to ensure that the risk of electrocution is minimised (insulators hanging down from crossbars, rather than pointing upwards, i.e. smaller powerlines), and fitting of new overhead lines in higher risk areas with Bird Flight Diverters to increase visibility and reduce collision risk. This must include all lines within 5km of eagle nests and all areas identified as important for blue crane and bustards. Existing power lines within these zones must also be retrofitted with bird flight diverters where possible.

Mitigation for habitat destruction must be implemented to micro-site turbines away from more sensitive habitats. Some habitat loss is unavoidable, but it should be minimised where possible.

12. CONCLUSION

In conclusion, a comprehensive range of ornithological baseline surveys have been carried out at the Frontier site during June 2019 to August 2020. Priority Species of Conservation Concern (SCC) identified using the site included Martial Eagle, Verreaux's Eagle, Blue Crane, Secretarybird, Ludwig's Bustard, Southern Black Korhaan and Secretarybird, and the baseline data have provided information on their use of the site and its surrounds.

The pre-construction monitoring data were used to produce spatial models of key species distributions, calculate potential range loss and quantify collision risk, in order to inform the assessment process. This enabled evidence-based advice to be provided on nest and roost site buffers, so that the final turbine positions avoided areas of higher ornithological sensitivity. Seven potential impacts (during construction – habitat loss and disturbance/displacement; during operation – collisions with turbines, disturbance/displacement, powerline collisions and electrocutions, and the disturbance during the decommissioning phase) were identified and assessed for the six Priority species taken forward for more detailed assessment in standard Impact Tables, together with the Cumulative impacts and requirements for mitigation.

Avifaunal risk avoidance was implemented as an ongoing process during the year with the removal and repositioning of turbines until the final layout. Impact Tables for each of the seven potential impacts on the Priority species were assessed, these included, Habitat loss, disturbance during construction and during operation, turbine collision risk, disturbance/displacement, powerline collision risk and the electrocution risk on powerline poles. A range of mitigation measures are required and must be implemented to reduce the potential impacts of the proposed development. These are set out in detail in the Ornithological Mitigation Plan (Appendix F).

The cumulative effect of the proposed Frontier Wind Farm development along with the predicted impacts of the future Choji Wind Farms and the neighbouring operational wind farms was assessed to be of MEDIUM significance. Key species that may possibly be impacted upon cumulatively include Blue Crane, Ludwig's Bustard, Southern Black Korhaan, Secretarybird, Martial Eagle and Verreaux's Eagle.

12.1. Assessment of Residual Effects

The residual ornithological effects of the Development will be a non-significant loss of a small amount of habitat to turbine bases and tracks/roads, and a non-significant risk of disturbance and collision.

Using evidence from existing wind farms, it is considered unlikely that the residual impacts will have any long-term impact on the integrity of the study area's ornithological features or the conservation status of the species found here.

Overall, there are not likely to be any significant residual impacts on ornithology as a result of the Development after the implementation of all the required mitigation measures. The overall affect will be of LOW significance.

However, it is essential to continue the nest monitoring to determine the long-term reproductive success of Martial and Verreaux's eagles (long-term disturbance effect), the post-construction monitoring of flight behaviour and the habitat use of these two eagles. While continuous carcass searches under turbines, to determine the long-term operational effect of this wind farm development on these birds. The regular driving under powerlines to monitor and search for carcasses, especially for Blue Crane.

Finally, we are confident in recommending that the Frontier Wind Farm can be authorised subject to the implementation of all the required mitigation measures.

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APPENDICES

[Appendix 1 Choje wind farms – Survey Hours for VP surveys](#)

– East block (Wind Garden and Fronteer)

[Appendix 2 Choje Wind Farms – Spatial Distribution Modelling of Key Species](#)

[Appendix A Impact Assessment Methodology from Savannah](#)

[Appendix B Avifaunal Management Plan](#)

[Appendix C Declaration of Specialist](#)

[Appendix D CV of the Specialist](#)

[Appendix E Statement](#)

- referring that the pre-construction bird monitoring started before the publishing of the Government Gazette 43110 (Published in Government Notice No. 320) of 20 March 2020 “Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Avifaunal Species by Onshore Wind Energy Generation Facilities where the electricity output is 20 Megawatts or more”.

[Appendix F Ornithological Mitigation Plan.](#)

APPENDIX 1: CHOJE WIND FARMS (EAST)

SURVEY HOURS FOR VANTAGE POINT SURVEYS – EASTERN BLOCK (WIND GARDEN AND FRONTEER)

Wind Farm	VP	Jun 2019	Jul	Aug	Sep	Oct	Nov	Dec 2019	Jan 2020	Feb	Mar	Apr	May	Jun	Jul	Aug 2020	TOTAL HRS
Fronteer	1	4	4	4	4	4	4	4	4	4	4	0	8	4	0	0	52
Fronteer	2	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
Fronteer	3	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
Wind Garden	4	4	5	4	4	4	4	4	4	4	4	0	4	4	0	0	49
Both	5	5	4	4	4	4	4	4	4	4	4	0	4	4	0	0	49
Wind Garden	6	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
None	7	4	4	4	4	4	4	4	4	4	4	0	13.5	4	8	8	73.5
Wind Garden	8	4	4	4	4	4	4	4	4.5	4	4	0	4	4	0	0	48.5
None	9	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
Wind Garden	10	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
Fronteer	11	4	4	4	4	4	4	4	4	4	4	0	4	4	0	0	48
None	12	0	0	4	4	4	4	4	4	4	7	0	4	4	8	8	59
None	13	0	0	4	4	4	4	4	4	4	4	0	4	4	8	8	56
None	14	0	0	4	4	4	4	4	4	4	4	0	4	4.5	8	8	56.5
None	15	0	0	4	4	4	4	4	4	5	4	0	4	4	8	8	57
None	16	0	0	4	4	4	4	4	4	4	4	0	4	4	8	8	56
Both	17	0	0	4	4	4	4	4	4	4	4	0	4	4	8	8	56
Hours/month		45	45	68	68	68	68	68	68.5	69	71	0	81.5	68.5	56	56	900.5
Wind Garden Hrs		21	21	24	24	24	24	24	24.5	24	24	0	24	24	8	8	298.5
Fronteer Hrs		21	20	24	24	24	24	24	24	24	24	0	28	24	8	8	301

APPENDIX 2: CHOJE WIND FARMS

SPATIAL DISTRIBUTION MODELLING OF KEY SPECIES

Factors Affecting Key Species' Flight Density and Distribution

This Appendix provides further details of the analyses undertaken to explore the survey data and provide more information to inform the site design and minimise risk of collision and other impacts from the wind farm. The focus of this work was the more abundant key species and those with greater spatial overlap with wind farm site (i.e. at higher risk of impact), Martial Eagle, Verreaux's Eagle and Cape Vulture.

Analysis Methods

Flight activity data from the VP surveys were analysed using a 200 x 200m grid overlaid onto the survey area, to determine a flight activity index (measured as the total observed track length per unit observation time, using ArcGIS) of each key species in each grid square, and this value was used as the response variable in the further analysis. The grid square flight densities were analysed in relation to the following explanatory variables:

- Distance from nest site (Martial Eagle and Verreaux's Eagle);
- Distance from roost site (Cape Vulture) - roost site locations were identified during road transect and additional focal roost surveys;
- Habitat type (derived from South African National Land Cover 2018 survey);
- Altitude (derived from NASA Shuttle Radar Topographic Mission (SRTM) digital elevation data²);
- Distance from nearest ridge line, calculated using SRTM data in Global Mapper software to identify ridge lines, using those at higher altitude (>600m);
- Slope (maximum within grid square, derived from SRTM data).

Other measures of local terrain variability were also investigated, including standard deviation of altitude with each grid square, terrain ruggedness index (Riley *et al.* 1999) and mean slope, but as they were strongly correlated with each other only one (maximum slope) was selected for inclusion in the modelling (as the one that gave the strongest relationship with flight activity). Similarly, alternative measures of topographic measures were considered, including topographic position index (Guisan *et al.* 1999) and mean slope, but these did not give as high a correlation with flight activity as maximum slope and were highly inter-correlated, so only maximum slope was taken forward for the modelling. Habitat was initially included in the analysis but was dropped from the final models as it did not improve the precision of those models.

Spatial Autoregressive Modelling (StataCorp 2019) was used to analyse these data to test whether each species' abundance was statistically significantly related to these explanatory variables. This enabled the latitude and longitude of the central point of each grid square to be included in the modelling to take into account any spatial autocorrelation in the data.

This analysis has focussed on data from the Western Block these data are more comprehensive from a wider area. All flight data were included in these analyses to make best use of all the available information. A check was made that this total flight activity was representative of flights at rotor height, and they were highly correlated ($p < 0.001$) for all three species ($r = 0.94$, 0.998 and 0.81 for Martial Eagle, Verreaux's Eagle and Cape Vulture respectively).

Martial Eagle

Martial Eagle flight density was strongly related to distance from the nest, with the highest densities recorded within 500m and a steady decline in flight density up to 2.5km from the nest in the Choje West block (Figure 1). Beyond 2.5km flight density was consistently lower. This provides strong evidence to support the initial suggestion of a 2.5km turbine exclusion zone around Martial Eagle nests, as flight activity is clearly considerably higher within that zone. Any exclusion of turbines beyond 2.5km would be of much

² NASA Shuttle Radar Topographic Mission (SRTM) digital elevation data at 30m resolution. NASA, 2018. Earth Observing System Data and Information System (EOSDIS).

less benefit in reducing collision risk. A similar result was found for the Choje East Block (Figure 2), though with higher flight activity within 1.5km of the nest.

Figure 1. Martial Eagle flight density and distance from the nest, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

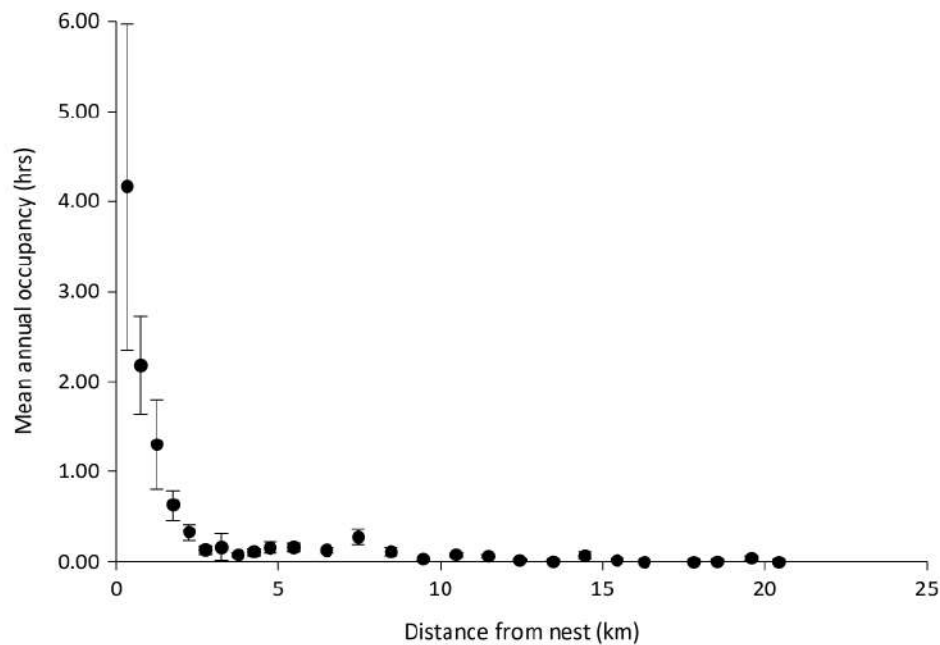
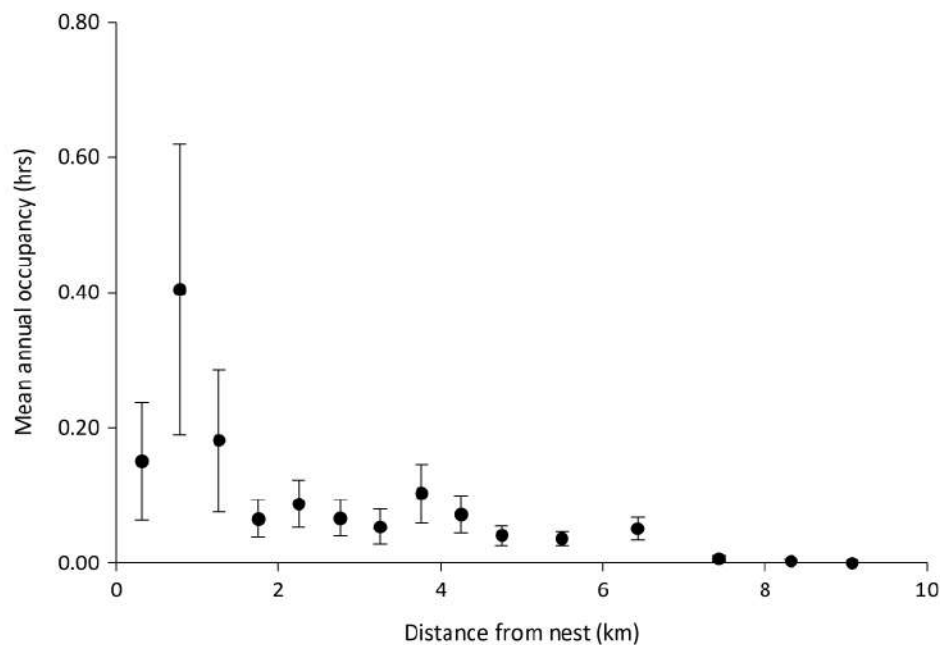


Figure 2. Martial Eagle flight density and distance from the nest, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Martial Eagle flight density was lower at lower altitudes (below 600m asl) and at higher (above 800m), with higher flight activity in the 600-800m range (Figure 3), probably as a result of the altitudinal zones of the

nest locations (and subsequent higher activity in proximity to nests). Flight activity in the East Block (Figure 24 showed a similar peak in the 700-800m altitude range.

Figure 3. Martial Eagle flight density and altitude (m above sea level), Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

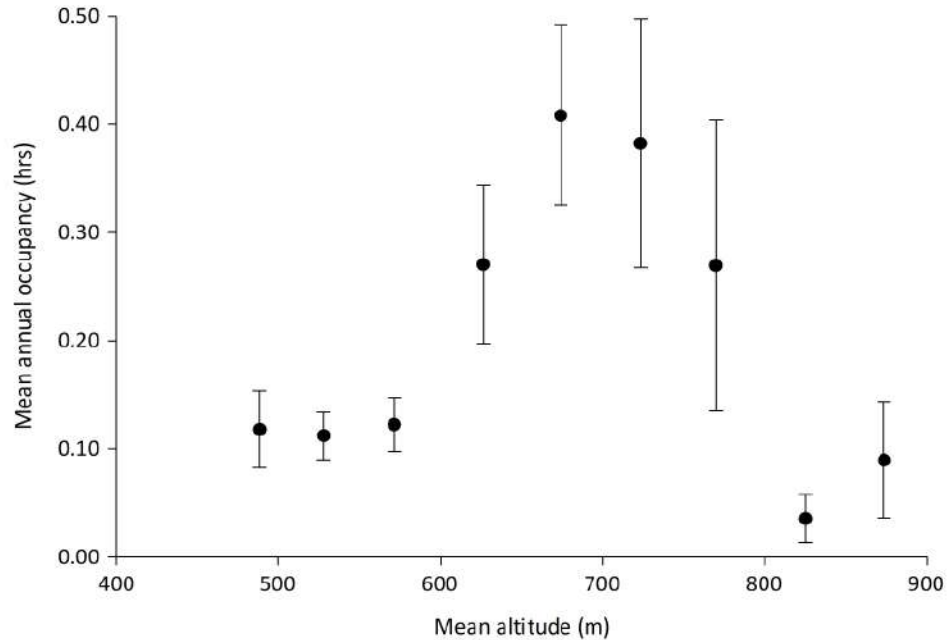
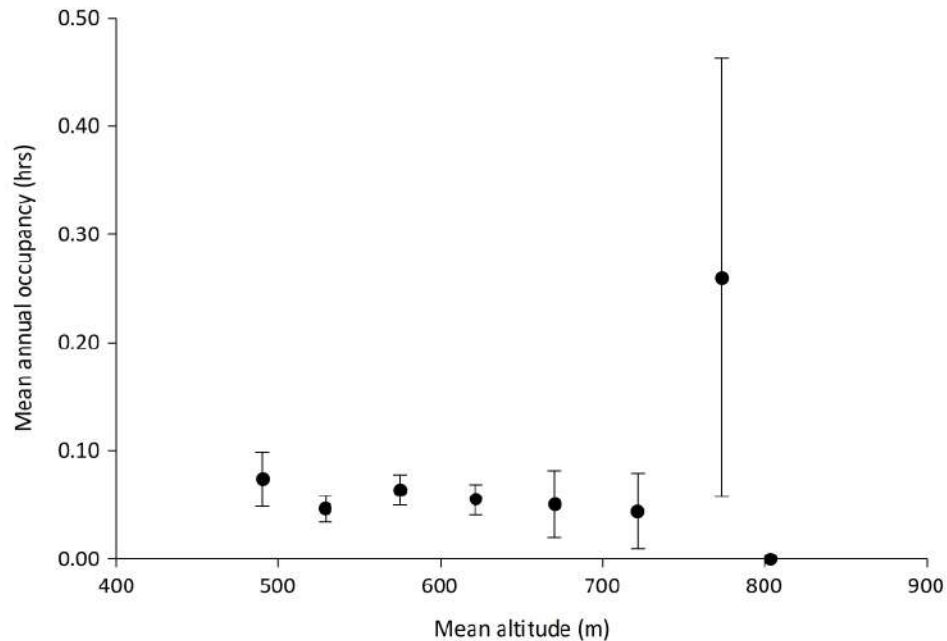


Figure 4. Martial Eagle flight density and altitude (m above sea level), Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Martial Eagle flight density was also strongly influenced by proximity to higher ridge lines, with higher activity within 1km (Figure 5). There was a less clear pattern in the East Block, where there was little variation with distance from ridgelines apart from a reduction beyond 2.5km (Figure 6).

Figure 5. Martial Eagle flight density and distance from higher (>600m) ridge lines, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

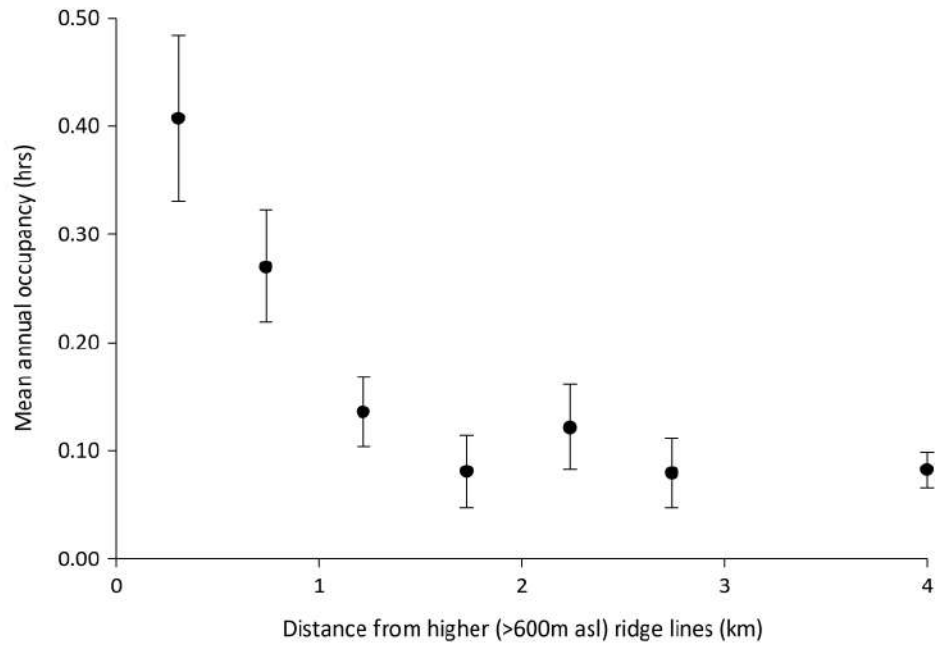
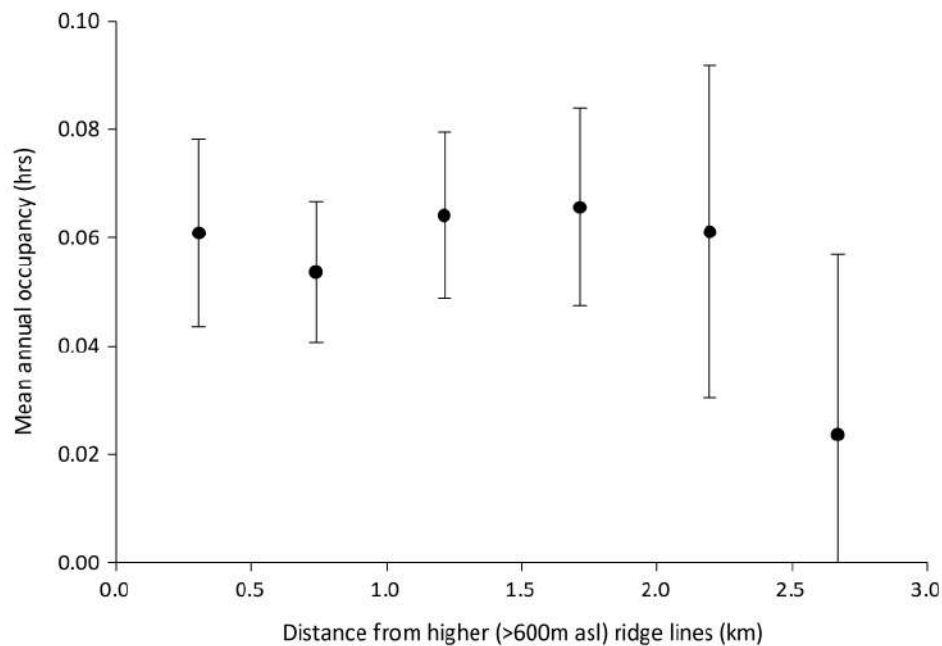


Figure 6. Martial Eagle flight density and distance from higher (>600m) ridge lines, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Martial Eagle flight density was lower in flatter areas (lower maximum slope), increasing steadily with increasing slope in the West Block (Figure 7) and in the East (Figure 8), though with increased variability on steeper slopes.

Figure 7. Martial Eagle flight density and maximum slope, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

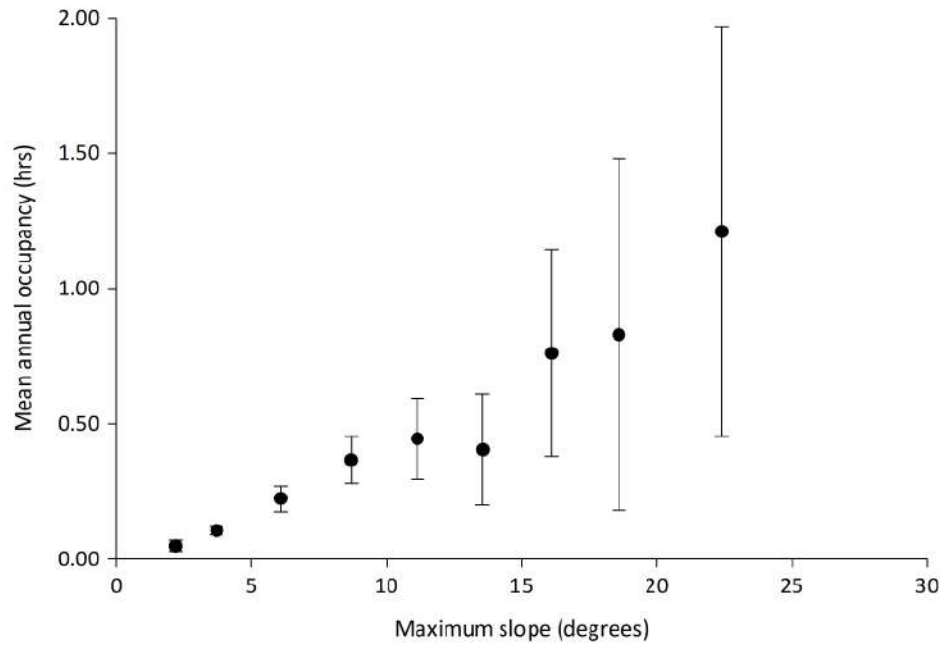
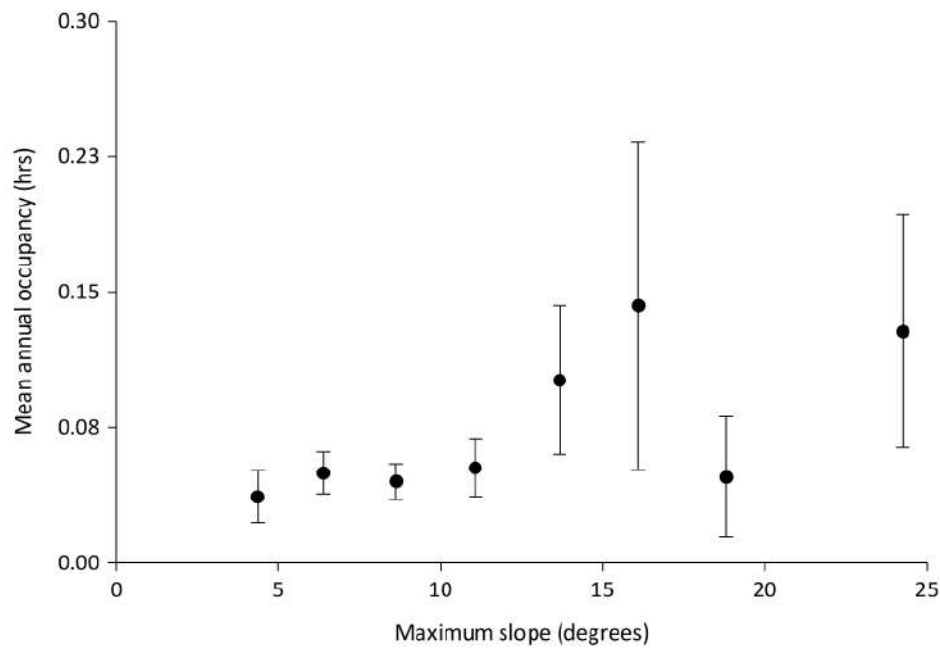


Figure 8. Martial Eagle flight density and maximum slope, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



There was variation in Martial Eagle flight density between habitats, with more activity over grassland and woodlands in the West (Figure 9), though also high variability (indicated by the large confidence interval bars). This may reflect the habitat types in proximity to the birds' nest sites, given the much higher flight densities around those sites. In the East there was little difference apparent in flight activity between habitats (Figure 10).

Figure 9. Martial Eagle flight density and habitat type (land cover 2018), Chojé West June 2019 - August 2020 (mean + 95% confidence limits).

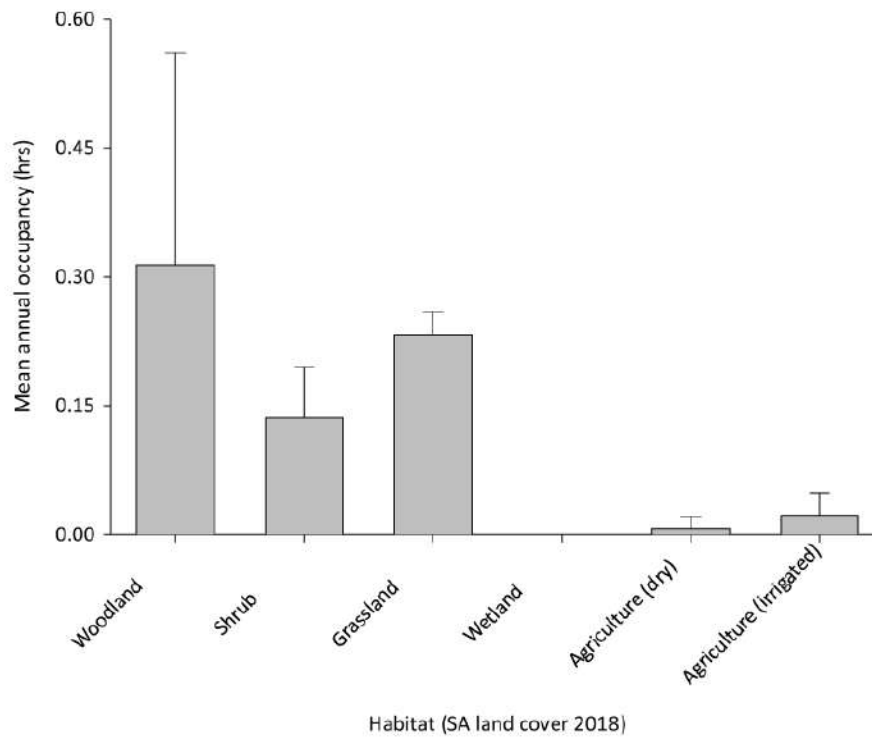
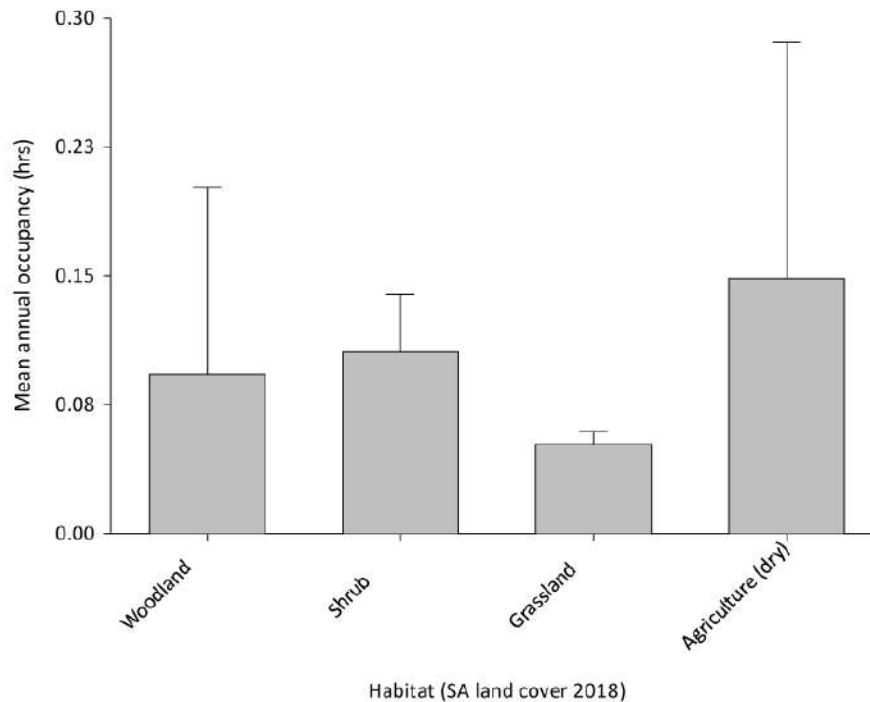


Figure 10. Martial Eagle flight density and habitat type (land cover 2018), Choje East June 2019 - August 2020 (mean + 95% confidence limits).



The results of the spatial modelling for Martial Eagle are summarised in Table 1. Distance from the nest (*ME_dist*) and altitude (*Alt_mean*) were the two variables most strongly related to flight density.

The spatial model was used to predict Martial Eagle flight activity across the whole of the study area, enabling estimates to be made of flight density in areas that fell outside the VP survey area, and hence complete coverage of the wind farm site and its surrounds, as shown in Figure 11 (West Block) and 12 (East Block). This could then be used to more fully quantify the benefits of applying buffer zones around nest sites (see following section on mitigation). This illustrates clearly the higher levels of use predicted around the nest sites, with the large majority of the higher use zones within the proposed turbine exclusion zone.

Figure 11. Predicted Martial Eagle distribution in the Choje Western Block. Darker shading indicates higher predicted use, with proposed turbine (small white dots) and turbine exclusion zones (larger black extended circles) also shown.

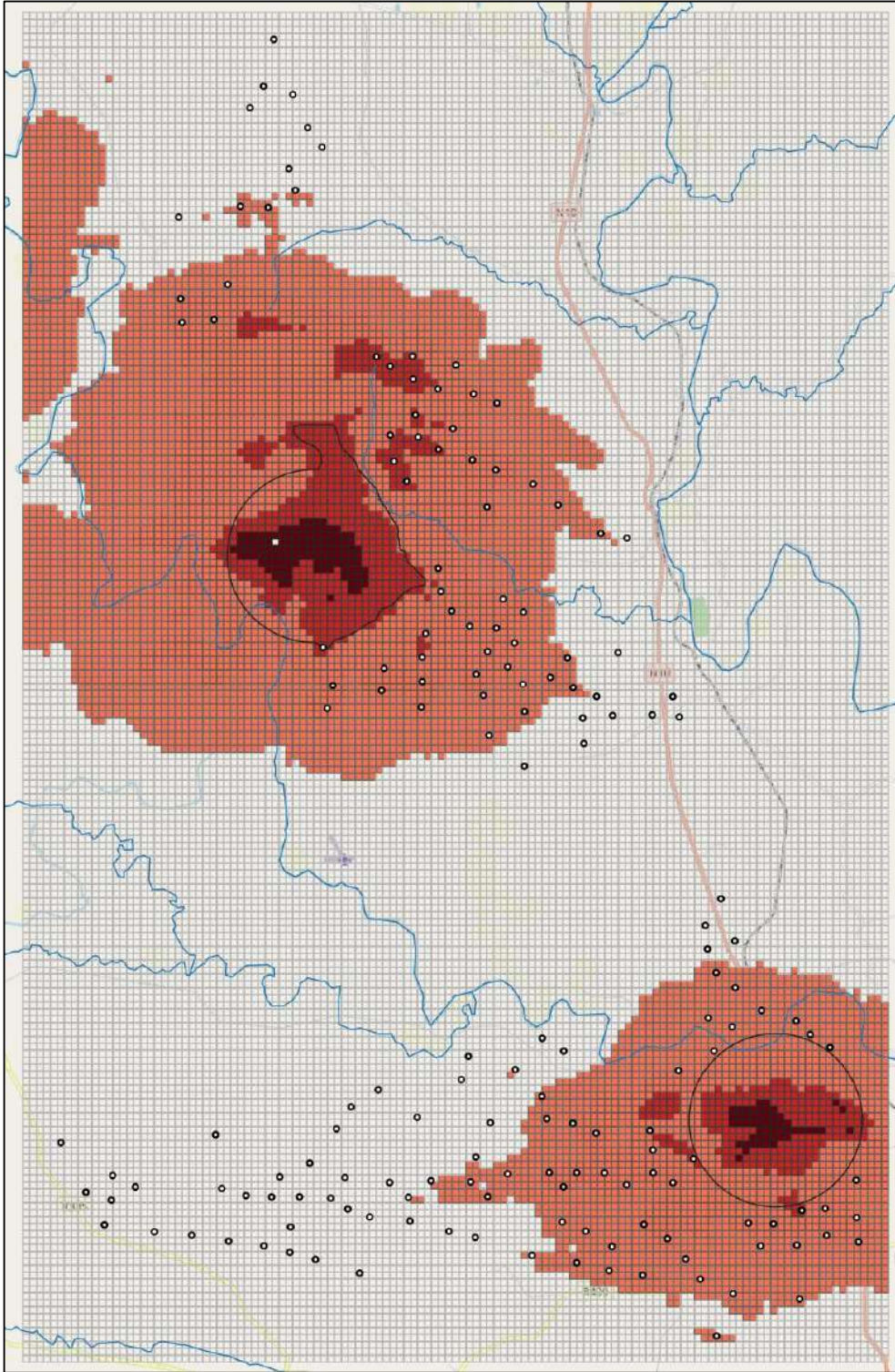


Figure 12. Predicted Martial Eagle distribution in the Choje Eastern Block. Darker shading indicates higher predicted use, with proposed turbine (small white dots) and turbine exclusion zones (larger black extended circles) also shown.

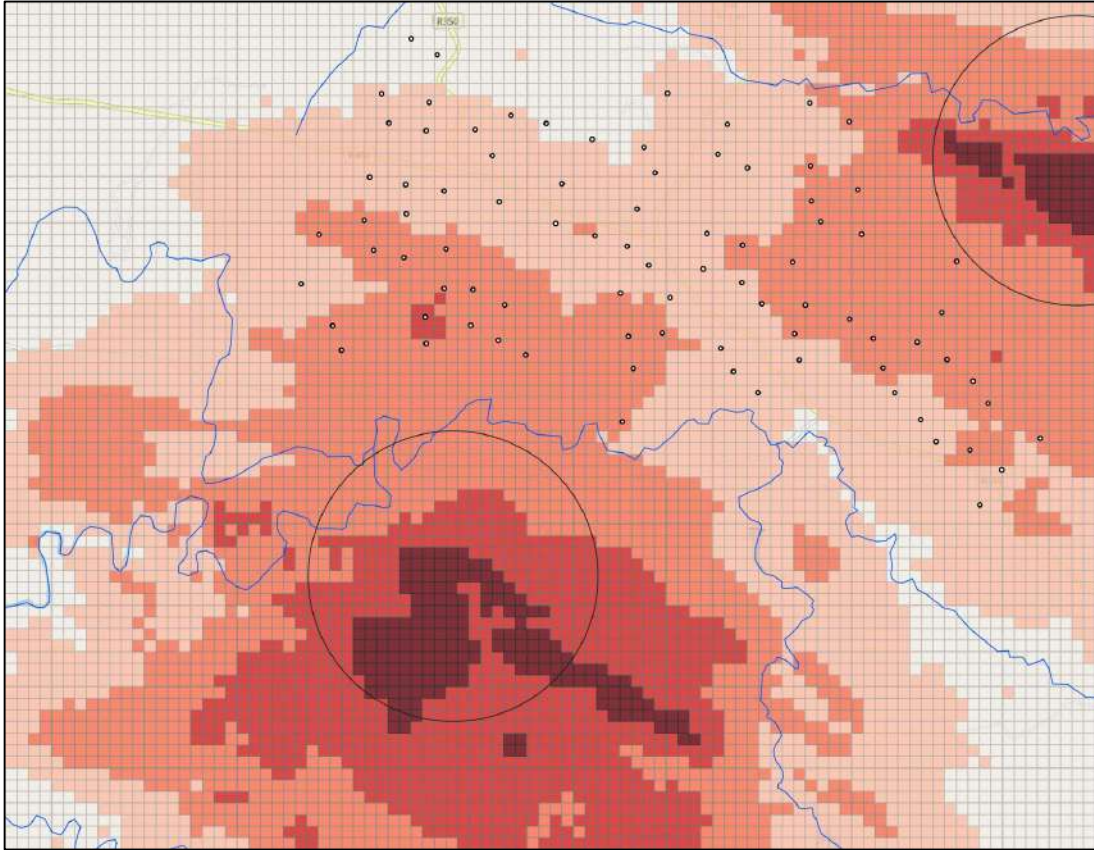


Table 1. Spatial autoregressive modelling results for Martial Eagle for Choje West June 2019 - August 2020

Spatial autoregressive model	Number of obs	=	5,035
GS2SLS estimates	Wald chi2(9)	=	1031.31
	Prob > chi2	=	0.0000
	Pseudo R2	=	0.1272

ME_LogOcc	Coef.	Std. Err.	z	P> z	[95% Conf. Interval]	
ME_LogOcc						
ME_Dist	-.0127315	.0018686	-6.81	0.000	-.0163939	-.0090692
Alt_mean	.0002223	.0000364	6.11	0.000	.000151	.0002936
Slope_max	.0007377	.000698	1.06	0.291	-.0006303	.0021057
Ridge600_Dist	-.0052949	.0038001	-1.39	0.164	-.0127429	.0021532
_cons	.0078316	.0148548	0.53	0.598	-.0212832	.0369464
WestGrid200_contig						
ME_Dist	.0124109	.0019062	6.51	0.000	.0086747	.0161471
Alt_mean	-.0002484	.000035	-7.10	0.000	-.0003169	-.0001798
Slope_max	.00169	.0015168	1.11	0.265	-.0012827	.0046628
Ridge600_Dist	.0056109	.0039469	1.42	0.155	-.0021248	.0133466
ME_LogOcc	.9165076	.1065873	8.60	0.000	.7076003	1.125415
e.ME_LogOcc	.0722844	.1036631	0.70	0.486	-.1308915	.2754604

Wald test of spatial terms: chi2(6) = 243.68 Prob > chi2 = 0.0000

Note: 'ME_LogOcc' = Martial Eagle grid square flight activity; 'Alt_mean' = Mean altitude; 'Slope_max' = Maximum slope; 'Ridge600_Dist' = Distance to nearest high (>600m asl) ridge line; 'ME_Dist' = Distance to nearest Martial Eagle nest site.

Verreaux's Eagle

There were no Verreaux's Eagle nests within 1.5km of any proposed wind turbine locations (to comply with BLSA guidance, BLSA 2017), so there was less coverage of areas in proximity to nests during VP surveys (which were designed primarily to maximise coverage of the wind farm site). As a result, flight activity data within that zone are limited, and the usual increased flight activity in closer proximity to the nest site was not apparent (Figure 13). A similar pattern was observed in the Choje East Block (Figure 14).

Figure 13. Verreaux's Eagle flight density and distance from the nest, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

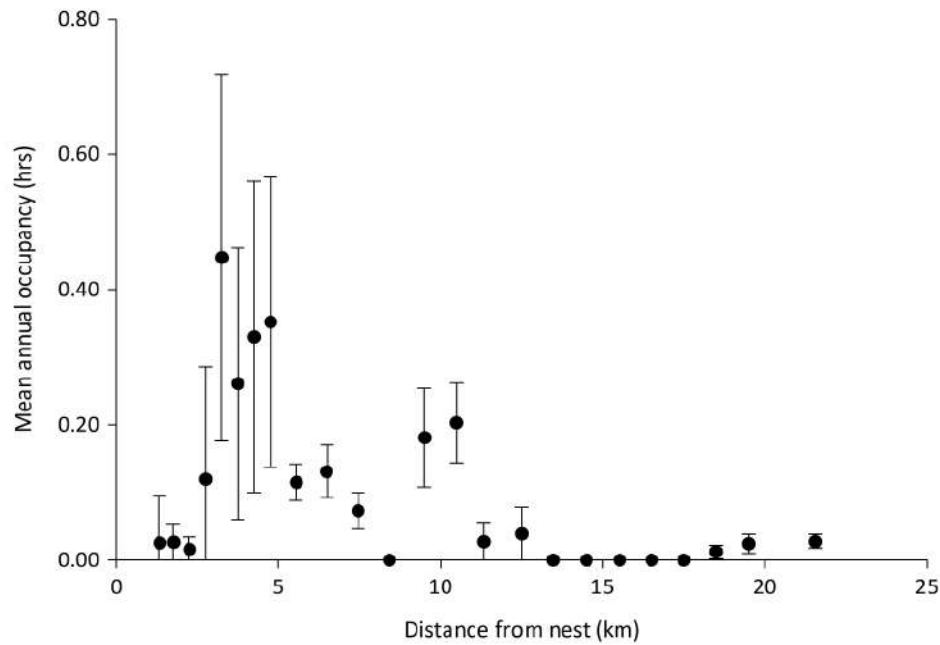
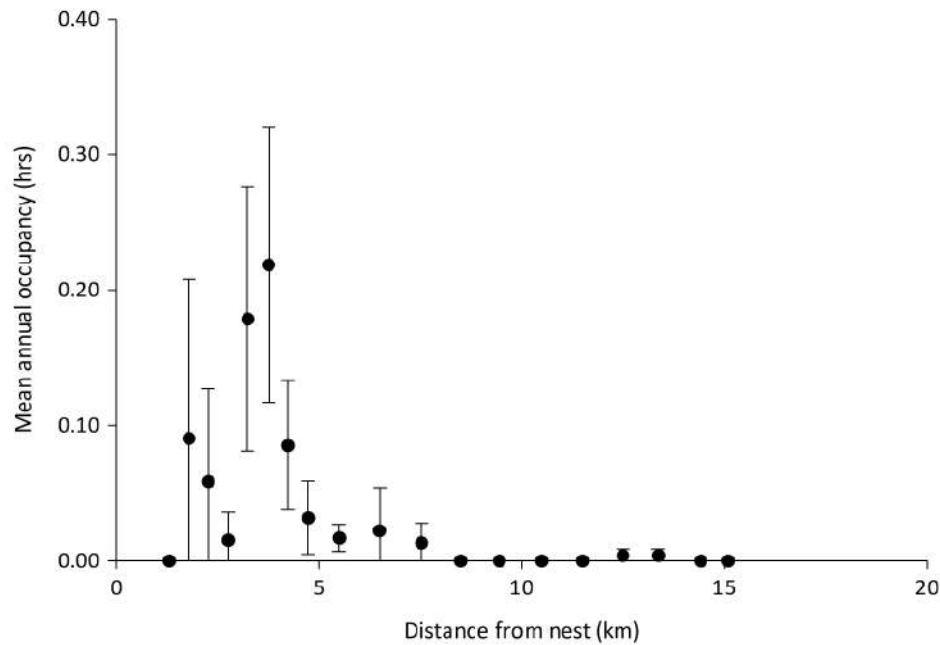


Figure 14. Verreaux's Eagle flight density and distance from the nest, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Verreaux's Eagle flight density showed a strong positive relationship with altitude, with very little flight activity in areas below 700m, and higher activity above 800m above sea level in the West Block (Figure 15). In the East Block (Figure 16), flight density was highest in the 550-700m zone.

Figure 15. Verreaux's Eagle flight density and altitude (m above sea level), Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

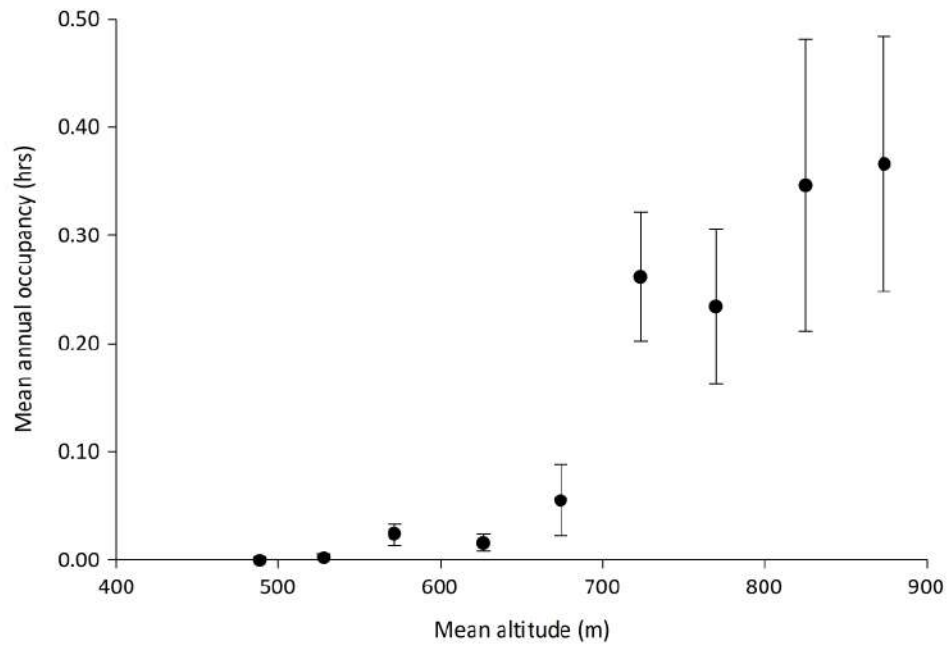
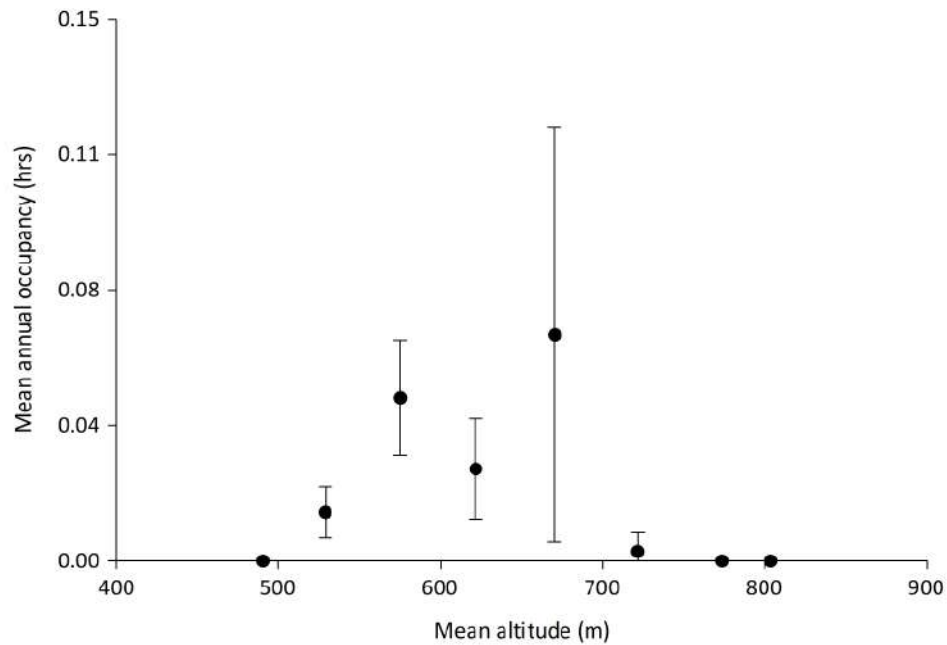


Figure 16. Verreaux's Eagle flight density and altitude (m above sea level), Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Verreaux's Eagle also exhibited a strong preference for flying near higher ridge lines, with higher flight density within 1km of ridges in the West Block (Figure 17) and within 1.5km in the East (Figure 18).

Figure 17. Verreaux's Eagle flight density and distance from higher (>600m) ridge lines, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

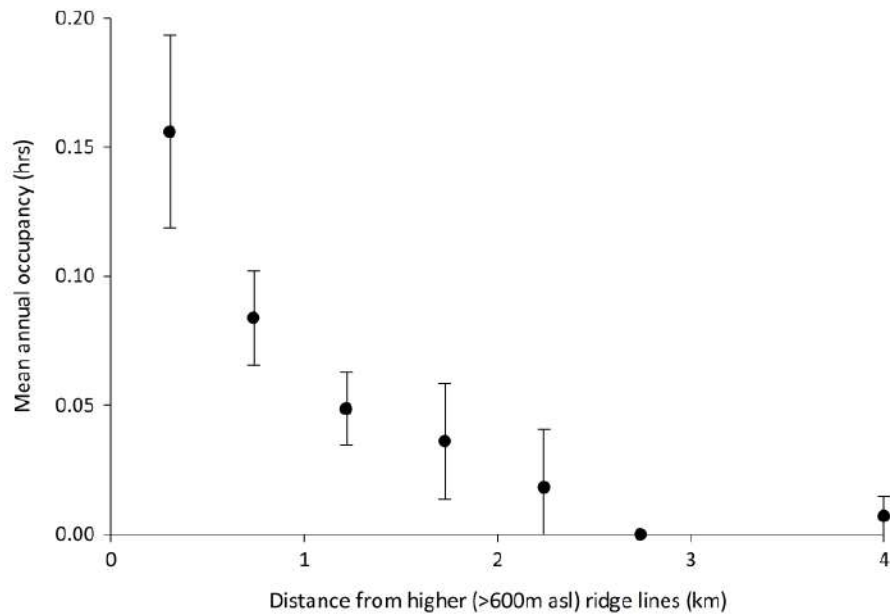
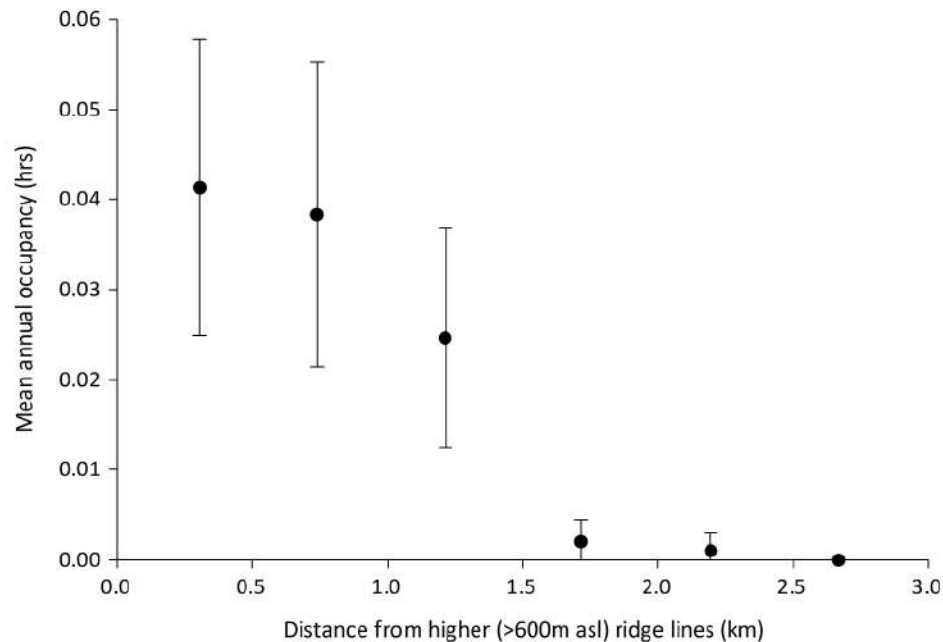


Figure 18. Verreaux's Eagle flight density and distance from higher (>600m) ridge lines, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Verreaux's Eagle flight density was lower in flatter areas (lower maximum slope), with notably higher activity on slopes exceeding 15 degrees (Figures 19 and 20), and with higher variability on steeper slopes.

Figure 19. Verreaux's Eagle flight density and maximum slope, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).

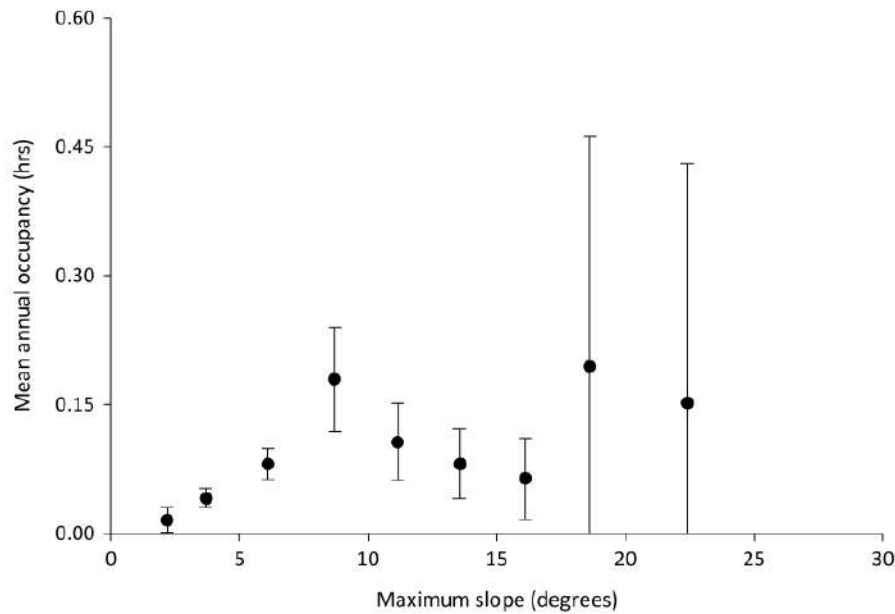
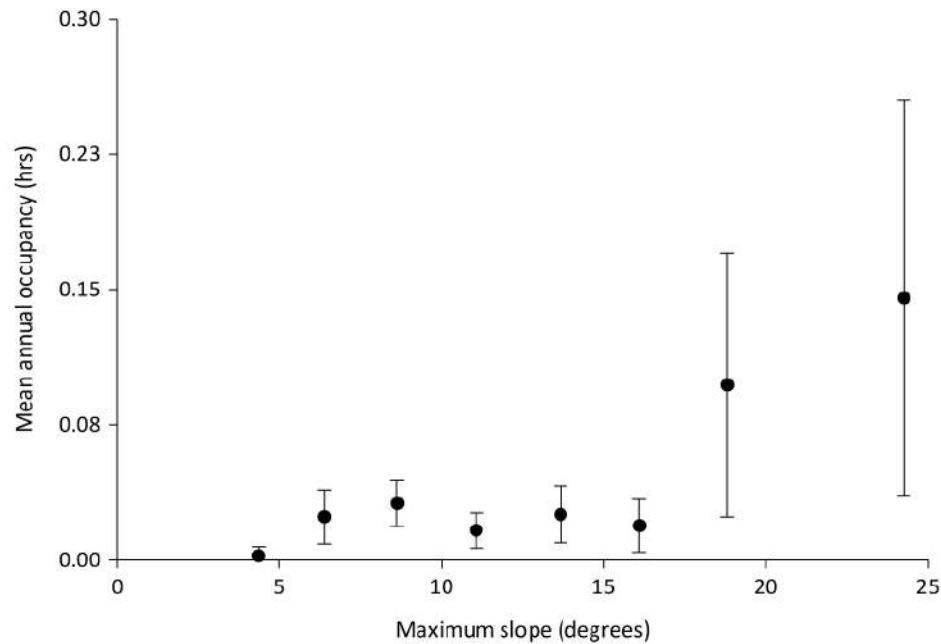


Figure 20. Verreaux's Eagle flight density and maximum slope, Choje East June 2019 - August 2020 (mean \pm 95% confidence limits).



Verreaux's Eagle showed a strong preference for open grassland habitat, with the majority of records from this habitat class in both the West Block (Figure 21), more records were observed over woodlands in the East (Figure 22).

Figure 21. Verreaux's Eagle flight density and habitat type (land cover 2018), Choje West June 2019 - August 2020 (mean + 95% confidence limits).

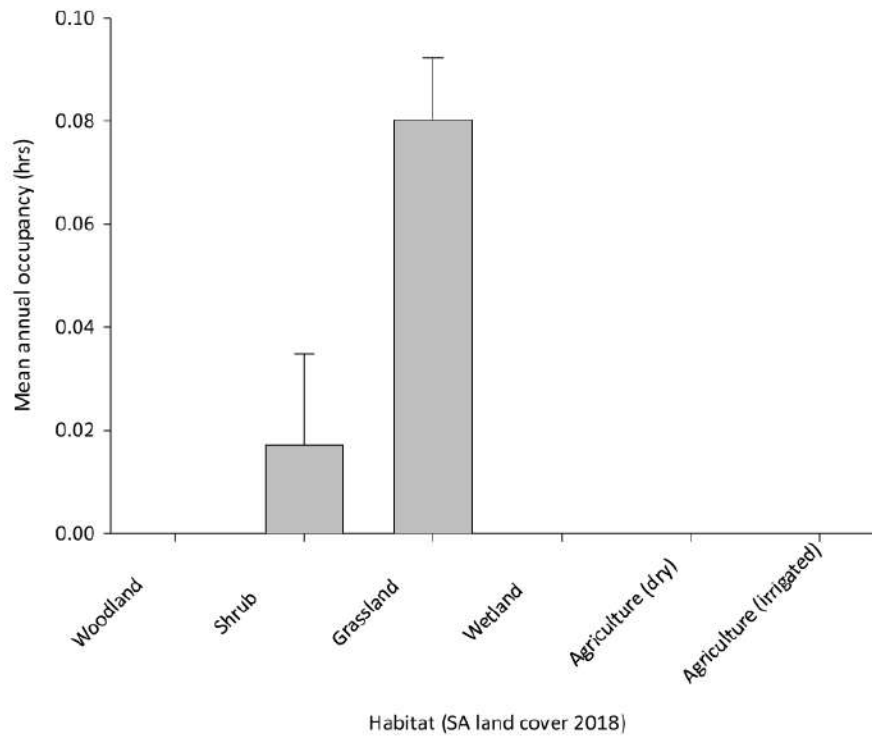
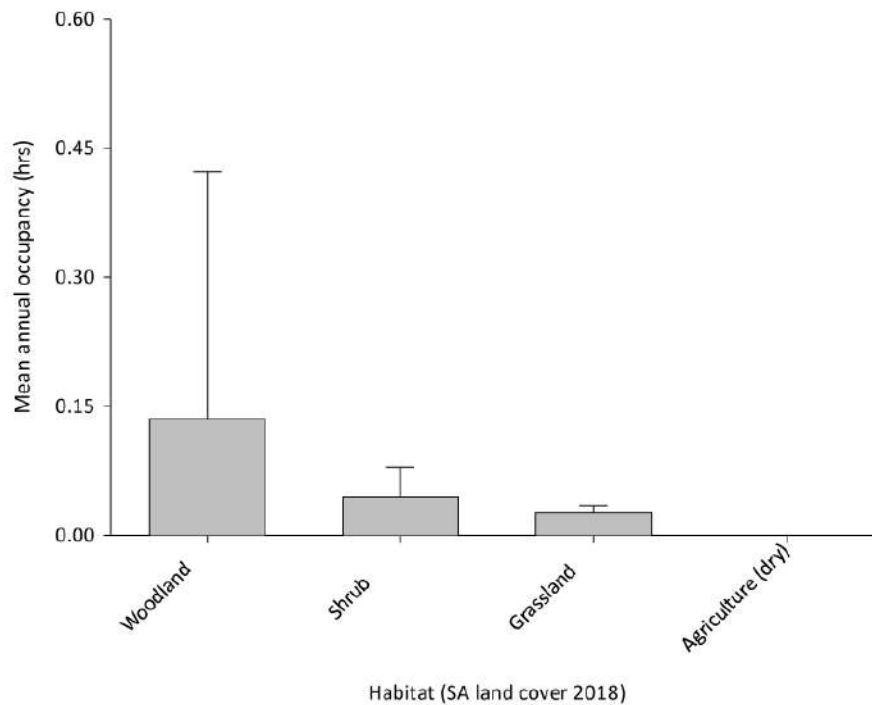


Figure 22. Verreaux's Eagle flight density and habitat type (land cover 2018), Choje East June 2019 - August 2020 (mean + 95% confidence limits).



The results of the spatial modelling for Verreaux's Eagle are summarised in Table 2. Distance from the nest (*VE_dist*) was less important for this species (as discussed above, few data were collected in closer proximity to Verreaux's Eagle nests, where flight activity would be expected to be higher), but altitude (*Alt_mean*) was strongly related to flight density.

The spatial model was used to predict Verreaux's Eagle flight activity across the whole of the study area, enabling estimates to be made of flight density in areas that fell outside the VP survey area, and hence complete coverage of the wind farm site, as shown in Figure 23. As for the equivalent modelling for Martial Eagle, this could then be used to more fully quantify the benefits of applying buffer zones around nest sites. It should be noted though that, as discussed above, there are few flight activity data available from within the buffer zones, so these do not show as clearly the benefits of applying these buffers.

Figure 23. Predicted Verreaux's Eagle distribution in the Choje Western Block. Darker shading indicates higher predicted use, with proposed turbine (small white dots) and proposed turbine exclusion zones (large black circles) also shown.

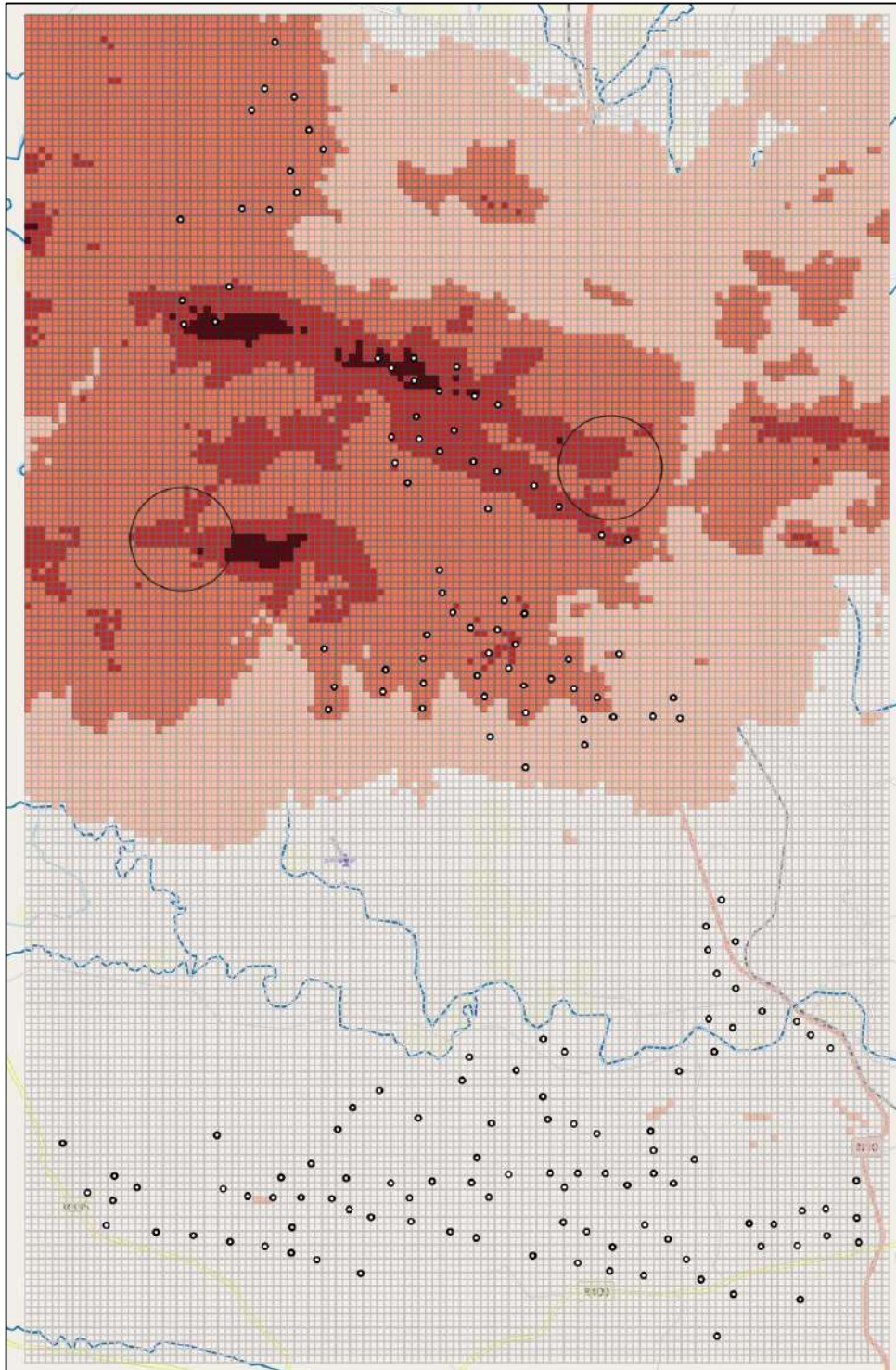


Figure 24. Predicted Verreaux's Eagle distribution in the Choje Eastern Block. Darker shading indicates higher predicted use, with proposed turbine (small white dots) and turbine exclusion zones (larger black extended circles) also shown.

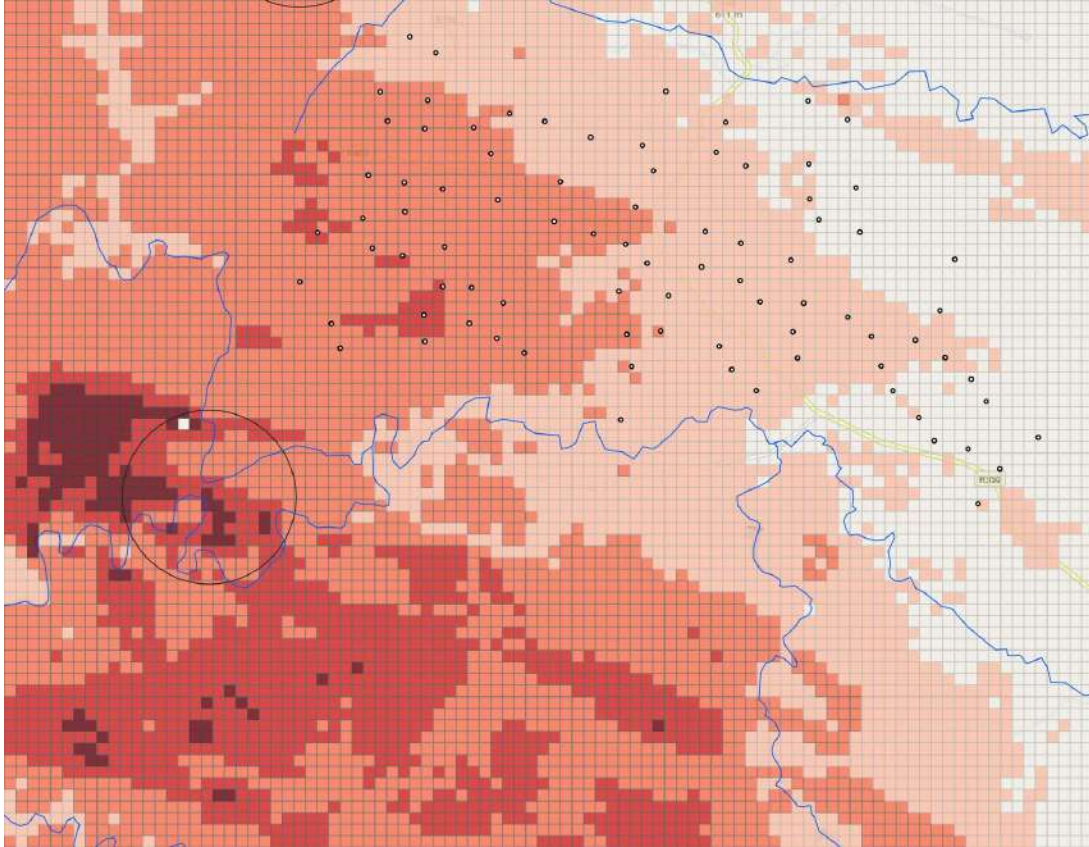


Table 2. Spatial autoregressive modelling results for Verreaux's Eagle for Choje West June 2019 - August 2020

Spatial autoregressive model	Number of obs	=	5,035
GS2SLS estimates	Wald chi2(9)	=	9637.73
	Prob > chi2	=	0.0000
	Pseudo R2	=	0.1562

VE_LogOcc	Coef.	Std. Err.	z	P> z	[95% Conf. Interval]	
VE_LogOcc						
VE_Dist	-.0033832	.0012547	-2.70	0.007	-.0058423	-.0009241
Alt_mean	.0001413	.0000423	3.34	0.001	.0000583	.0002242
Slope_max	.0007224	.000394	1.83	0.067	-.0000497	.0014946
Ridge600_Dist	-.0000994	.0020439	-0.05	0.961	-.0041054	.0039065
_cons	-.0269601	.0270847	-1.00	0.320	-.0800451	.0261249
WestGrid200_inv						
VE_Dist	.0102771	.0023614	4.35	0.000	.0056489	.0149053
Alt_mean	-.0002114	.000067	-3.16	0.002	-.0003427	-.0000801
Slope_max	-.0009589	.0024217	-4.11	0.000	-.0147054	-.0052124
Ridge600_Dist	-.0001898	.0069056	-0.03	0.978	-.0137244	.0133449
VE_LogOcc	2.840624	.133522	21.27	0.000	2.578925	3.102322
e.VE_LogOcc	9.824169	1.348158	7.29	0.000	7.181828	12.46651

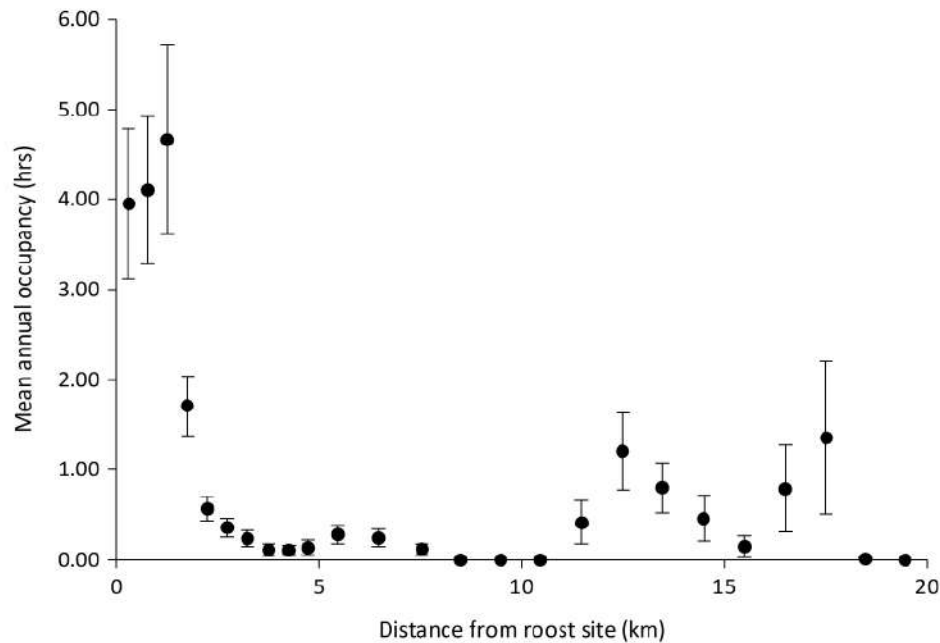
Wald test of spatial terms: chi2(6) = 1267.32 Prob > chi2 = 0.0000

Note: 'VE_LogOcc' = Verreaux's Eagle grid square flight activity; 'Alt_mean' = Mean altitude; 'Slope_max' = Maximum slope; 'Ridge600_Dist' = Distance to nearest high (>600m asl) ridge line; 'VE_Dist' = Distance to nearest Verreaux's Eagle nest site.

Cape Vulture

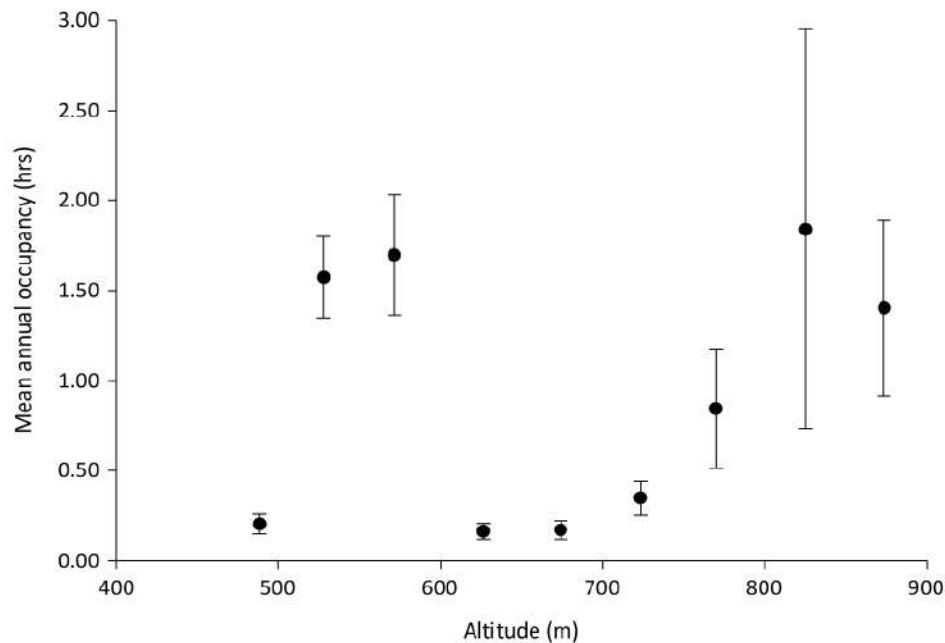
Cape Vultures did not breed within the survey area, so their flight distribution was not associated with any nest sites, but they were strongly associated with their night roost sites (with higher flight densities within 2km of the roosts, Figure 25).

Figure 25. Cape Vulture flight density and distance from the nearest roost, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).



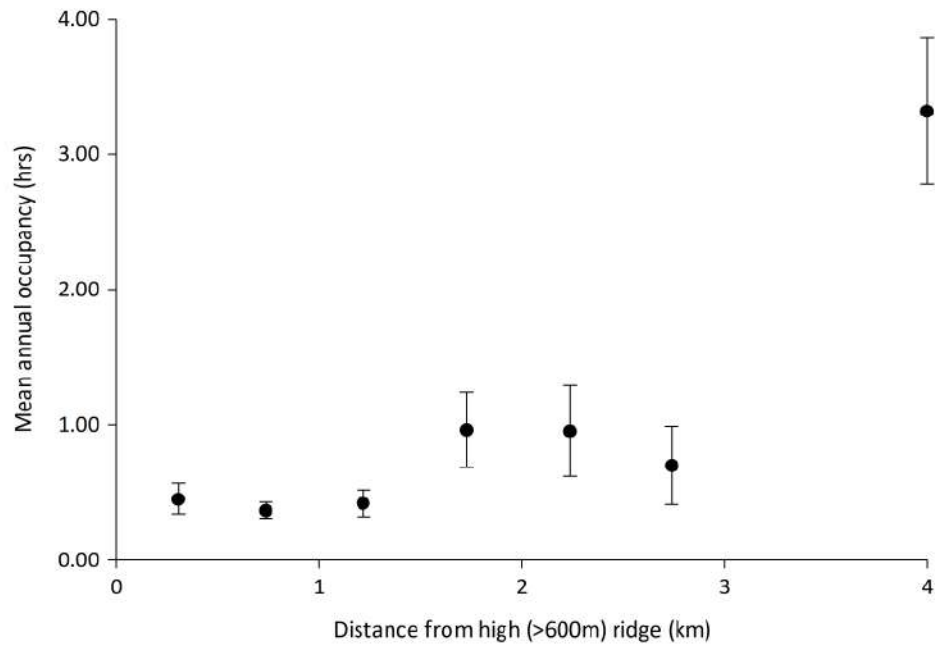
Cape Vulture flight density showed two peaks in relation to altitude, one around 500-600m (coincident with the altitude of their main roost sites) and a second above 800m above sea level (Figure 26).

Figure 26. Cape Vulture flight density and altitude (m above sea level), Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).



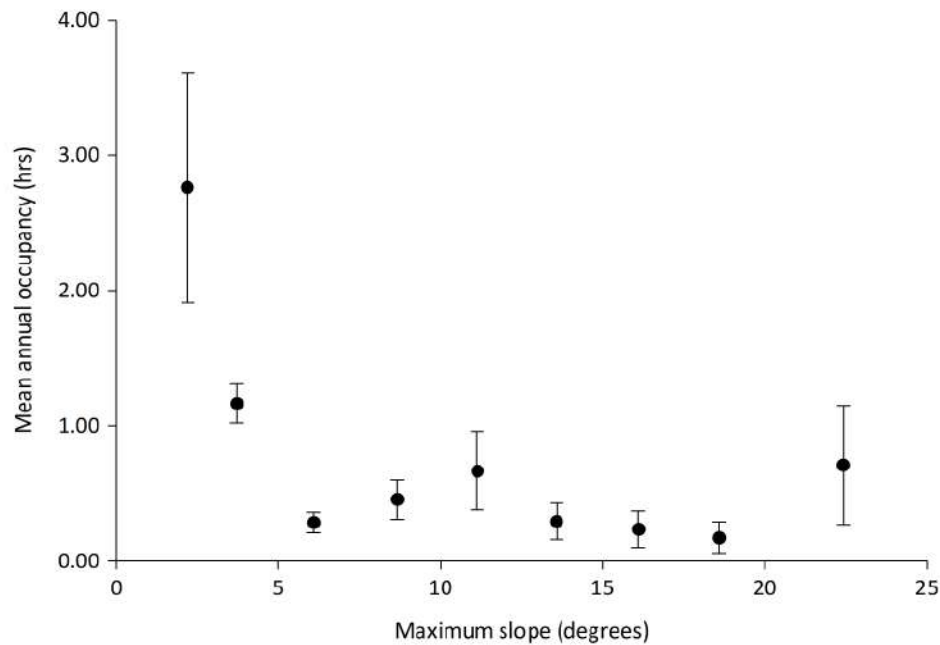
Cape Vulture flight density did not vary greatly in relation to distance from higher ridgelines, apart from a higher level at 4km (the distance coincident with the location of their main roost sites, Figure 27).

Figure 27. Cape Vulture flight density and distance from higher (>600m) ridge lines, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).



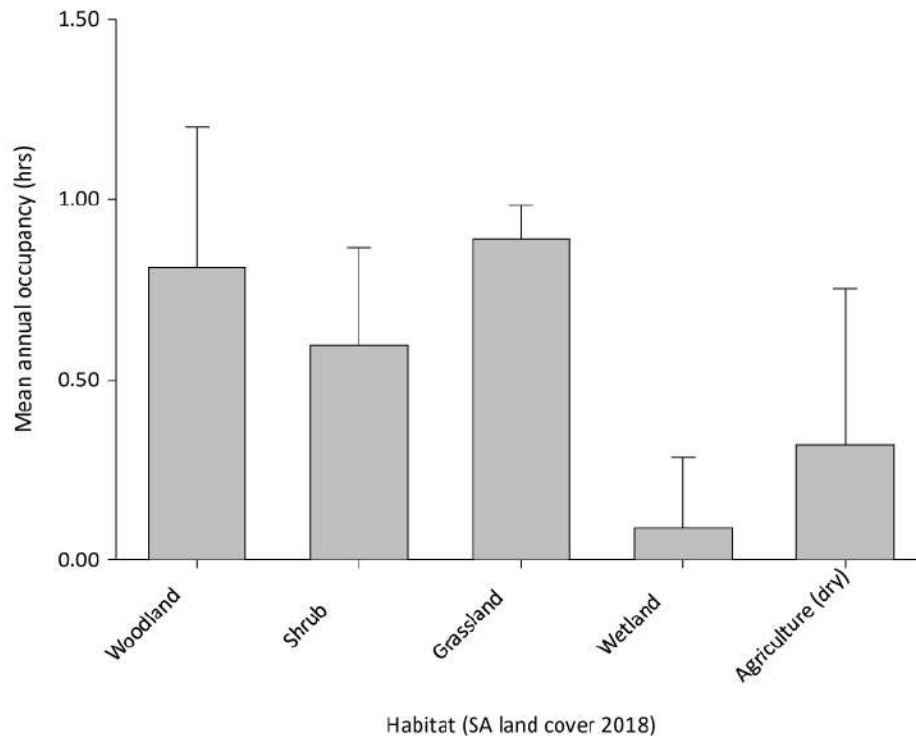
Cape Vulture flight density was highest in flatter areas (lower maximum slope), with lower activity on slopes exceeding 5 degrees slope (Figure 28).

Figure 28. Cape Vulture flight density and maximum slope, Choje West June 2019 - August 2020 (mean \pm 95% confidence limits).



Cape Vultures used a range of habitat types, but higher flight densities were recorded over grasslands, scrub and woodland (Figure 29).

Figure 30. Cape Vulture flight density and habitat type (land cover 2018), Choje West June 2019 - August 2020 (mean + 95% confidence limits).



The results of the spatial modelling for Cape Vulture are summarised in Table 3. Distance from the roost (*CV_dist*) and altitude (*Alt_mean*) were the two variables most strongly related to flight density.

The spatial model was used to predict Cape Vulture flight activity across the whole of the study area, enabling estimates to be made of flight density in areas that fell outside the VP survey area, and hence complete coverage of the wind farm site, as shown in Figure 31. This could then be used to more fully quantify the benefits of applying buffer zones around roost sites.

Figure 31. Predicted Cape Vulture distribution. Darker shading indicates higher predicted use, with proposed turbine (small white dots) and 2km roost buffer zones (solid black lines) also shown.

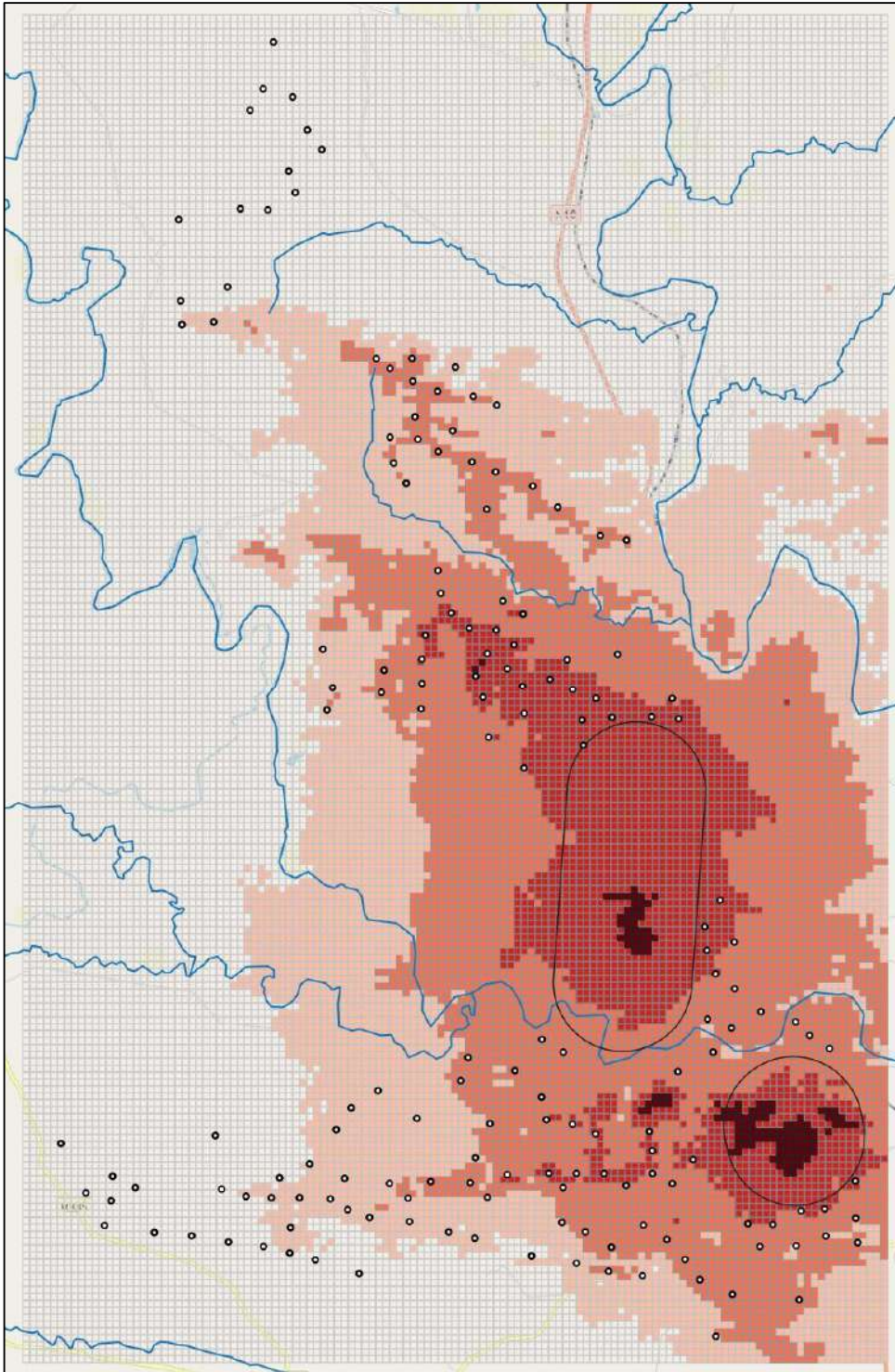


Table 3. Spatial autoregressive modelling results for Cape Vulture for Choje West June 2019 - August 2020

Spatial autoregressive model	Number of obs	=	5,035
GS2SLS estimates	Wald chi2(9)	=	6901.30
	Prob > chi2	=	0.0000
	Pseudo R2	=	0.2797

CV_LogOcc	Coef.	Std. Err.	z	P> z	[95% Conf. Interval]	
CV_LogOcc						
CV_Dist	-.0105113	.0018755	-5.60	0.000	-.0141871	-.0068354
Alt_mean	.0003725	.0000612	6.08	0.000	.0002525	.0004926
Slope_max	-.0022023	.0009372	-2.35	0.019	-.0040391	-.0003655
Ridge600_Dist	.0048486	.0075932	0.64	0.523	-.0100338	.019731
_cons	-.0567729	.0270587	-2.10	0.036	-.1098069	-.0037388
WestGrid200_contig						
CV_Dist	.0096047	.0021747	4.42	0.000	.0053425	.013867
Alt_mean	-.0002712	.0000507	-5.35	0.000	-.0003705	-.0001719
Slope_max	.001819	.0013421	1.36	0.175	-.0008114	.0044495
Ridge600_Dist	-.0018321	.0084908	-0.22	0.829	-.0184738	.0148096
CV_LogOcc	.9885125	.022191	44.55	0.000	.945019	1.032006
e.CV_LogOcc	-.303651	.0722655	-4.20	0.000	-.4452888	-.1620133

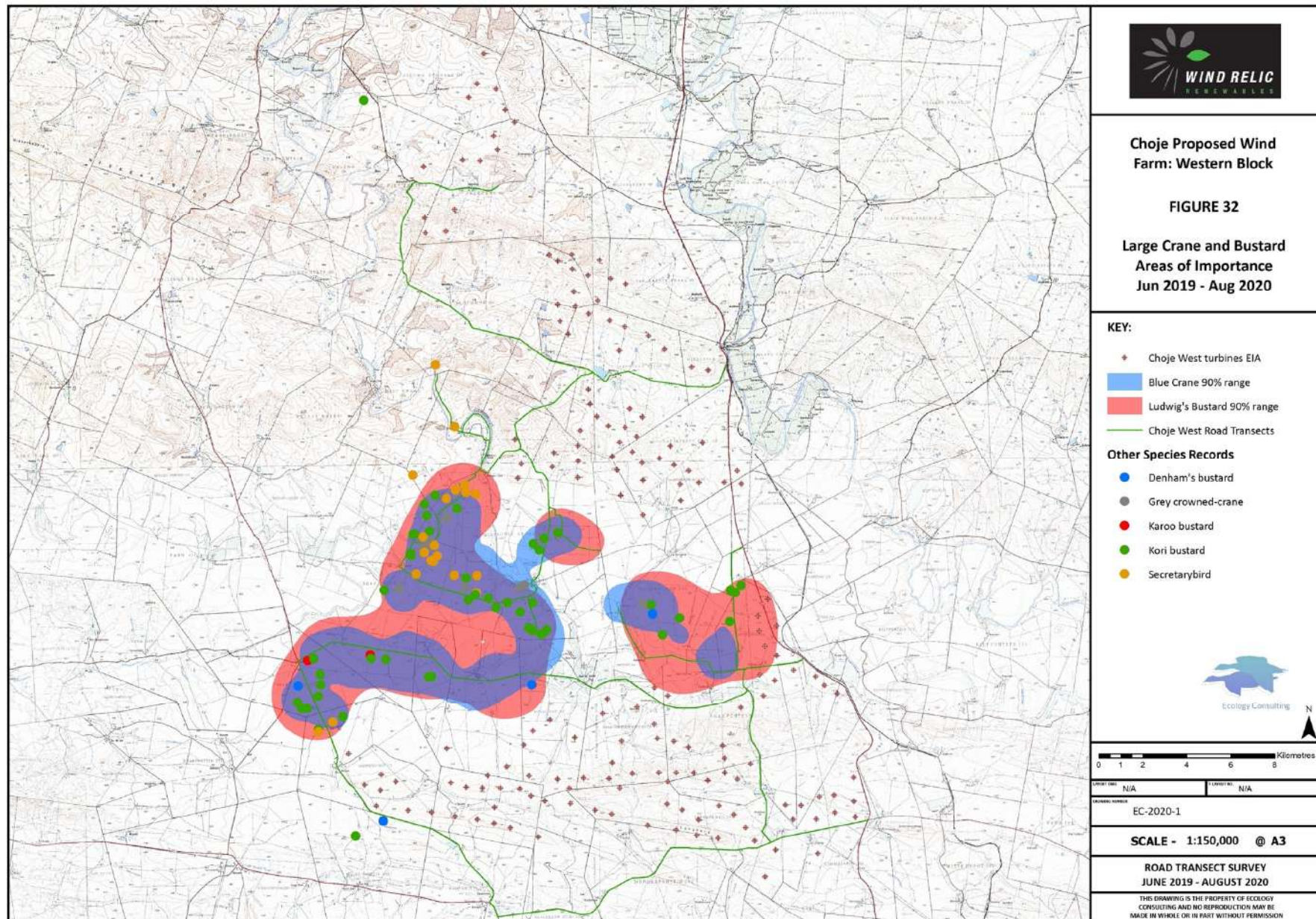
Wald test of spatial terms: chi2(6) = 2612.03 Prob > chi2 = 0.0000

Note: 'CV_LogOcc' = Cape Vulture grid square flight activity; 'Alt_mean' = Mean altitude; 'Slope_max' = Maximum slope; 'Ridge600_Dist' = Distance to nearest high (>600m asl) ridge line; 'CV_Dist' = Distance to nearest Cape Vulture roost site.

Cranes and Bustards

The areas of higher importance for cranes and bustards were identified in the previous February 2020 report primarily from the road transect data, and that same approach has been adopted here. This analysis focussed on the two more abundant larger species, Blue Crane and Ludwig's Bustard, as the two species most at risk from the wind farm, then considered how these areas included areas used by other less abundant species.

This 'area of higher importance' was determined firstly by calculating the 90% utilisation range of the each of these two species, using kernel density estimation (Worton 1989), then merging those two areas. The results are shown in Figure 32. A check was then made against the records from the other large crane and bustard species recorded, to see whether their distribution was included in this area. Very few records lay outside this merged range, so no further extension of that area was required.



Appendix A - Savannah – Impact Assessment Methodology

Assessment of Impacts

Direct, indirect and cumulative impacts associated with the projects must be assessed in terms of the following criteria:

- » The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- » The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- » The **duration**, wherein it will be indicated whether:
 - * the lifetime of the impact will be of a very short duration (0–1 years) – assigned a score of 1;
 - * the lifetime of the impact will be of a short duration (2-5 years) - assigned a score of 2;
 - * medium-term (5–15 years) – assigned a score of 3;
 - * long term (> 15 years) - assigned a score of 4; or
 - * permanent - assigned a score of 5;
- » The **magnitude**, quantified on a scale from 0-10, where 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- » The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1–5, where 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- » the **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- » the **status**, which will be described as either positive, negative or neutral.
- » the degree to which the impact can be reversed.
- » the degree to which the impact may cause irreplaceable loss of resources.
- » the *degree* to which the impact can be *mitigated*.

The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M)P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- » < 30 points: Low (i.e. where this impact would not have a direct influence on the decision to develop in the area),
- » 30-60 points: Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- » > 60 points: High (i.e. where the impact must have an influence on the decision process to develop in the area).

Appendix B - AVIFAUNAL MANAGEMENT PLAN

OBJECTIVE: to provide guidance to the Developer, the Environmental Control Officer and the construction contractor before the start of the construction work, especially concentrating on the findings of the AIA report and Sensitivity areas. This also include the “do’s and don’ts” of every aspect that will be underlined by the EAP and every other specialist.

The Developer need to employ an independent Environmental Control Officer (ECO) to oversee all construction work, which in turn needs to sign agreements with the Construction Contractors (CCs) (and sub-contractors) to obey to all environmental authorisation terms, etc.

The Avifaunal specialist need to train the ECO and CCs in understanding the needs and work in perform their duties to the minimum risk and impact on birds during construction of all aspects of their work.

POST-CONSTRUCTION BIRD MONITORING PROGRAMME

The work done to date on the Fronteer wind farm site has established a baseline understanding of the distribution, abundance and movement of key bird species on and near the site. However this is purely the ‘before’ baseline and aside from providing input into turbine micro-siting, it is not very informative until compared to post-construction data. The following programme has therefore been developed to meet these needs. It is recommended that this programme be implemented by the Fronteer Wind Farm if constructed.

During construction monitoring

It will be necessary to monitor the breeding status and productivity of the Martial Eagle and the Verreaux’s eagle pairs during breeding seasons during construction. This can be done by a minimum of three visits to the nest site per breeding season, or close enough to observe the eagles without disturbing them.

Post-construction monitoring

The intention with post-construction bird monitoring is to repeat as closely as possible the methods and activities used to collect data pre-construction. This work will allow the assessment of the impacts of the proposed facility and the development of active and passive mitigation measures that can be implemented in the future where necessary.

One very important additional component needs to be added, namely mortality estimates through carcass searches under turbines. The following programme has therefore been developed to meet these needs, and should start as soon as possible after the operation of the first phase of turbines (not later than 3 months):

Note that this framework is an interim draft. The most up to date version of the best practice guidelines (Jenkins et al 2015) should inform the programme design at the time.

Live bird monitoring:

- » The 6 Walking transects of 400m each that have been done during pre-construction monitoring should be continued.
- » The Road transect survey should be continued and conducted twice on each site visit.
- » The 11 Focal point surveys along the Road transect route. If any sensitive species are found breeding on site in future these nest sites should be defined as focal sites.
- » The 6 Vantage Point surveys already established should be used to continue data collection post-construction. The exact positioning of these may need to be refined based on the presence of new turbines and roads. A total of 12 hours of observation should be conducted at each vantage point on each site visit, resulting in a total of 48 hours direct observation on site per site visit.

Bird Fatality estimates

This is now an accepted component of the post construction monitoring program and the newest guidelines (Jenkins et al, 2015) will be used to design the monitoring program. It is important that in addition to searching for carcasses under turbines, an estimate of the detection (the success rate that monitors achieve in finding carcasses) and scavenging rates (the rate at which carcasses are removed and hence not available for detection) is also obtained (Jenkins et al, 2015). Both of these aspects can be measured using a sample of carcasses of birds placed out in the field randomly. The rate at which these carcasses are detected and the rate at which they decay or are removed by scavengers should also be measured.

The area surrounding the base of turbines should be searched (up to a radius equal to 75% of the maximum height of turbine) for collision victims. The frequency at which these searches need to be conducted will be at least every 10 working days (or effective two weeks). Any suspected collision casualty should be comprehensively documented (for more detail see Jenkins et al, 2015). A team of carcass searchers will need to be employed and these carcass searchers will work on site every day searching the turbines for mortalities. It is also important that associated infrastructure such as power lines and wind masts be searched for collision victims according to similar methods.

A more detailed postconstruction monitoring programme can be designed once the full layout is finalised. The most up to date version of the best practice guidelines (Jenkins et al, 2015) should inform the programme design at the time.

Eagle Conservation Plan for the Choje energy complex

The future existence of the three large eagles, Martial, Verreaux's and African Crowned eagles will be under significant additional pressure from the proposed Choje wind and solar farms and their infrastructure. Because these eagles are presently already under pressure to survive mainly because of competition with farming activities and habitat loss.

This is a complex situation of biodiversity and natural food chains in competition with agriculture. More and more food is needed for humans in our cities. This creates a demand for landowners to produce such and with available water, this is possible even in the Karoo landscapes.

With this, more and more threats are put on the existence of these eagle species. The emphasis on only the three large eagles is because their behaviour and ability to kill larger prey (medium-sized mammals), which can include the young of domestic stock, make them different and put them regularly in conflict with farmers. Similarly their large territory sizes and habitat requirements are different to other raptors.

Below is a summary of the common threats currently facing these large eagles in the Karoo environment (Marnewick et al. 2015):

1. Habitat loss due to the ever expansion of the agricultural and food needs to plant more and more croplands, especially with the availability of water. Less habitat to support their prey base.
2. Permanent water along the Great and Little Fish rivers causes disproportionate growth of Acacia karroo thorn trees. These riparian overgrowths cover the rocky parts of the river (especially on bends), where Verreaux's eagle hunt, therefore limit them to large portions of their rocky habitat.
3. Overgrazing by domestic stock, sheep, goats and cattle. This results in a depletion of palatable plant species, soil erosion, and encroachment by Karoo shrubs, and include here is human encroachment. The result is loss of suitable habitat and a decrease in the availability of food (prey depletion) for these eagles.
4. Over-browsing by goats cause the degradation of bushveld thicket vegetation in the Eastern Cape, especially in remote southern slopes where Martial and African Crowned eagles nest/breed. The goats eat the undergrowth of bush clumps and this reduce the support of the large trees such as Euphorbia, Cussonia, Olive, and even Yellowwood. These trees often collapse when isolated.
5. Poisoning to control damage-causing predators, such as Blackbacked Jackal Canis mesomelas and Caracal Caracal caracas. The use of poison still continues, and the potential impacts on these eagle species has not been confirmed or quantified.
6. Roads are continuously getting more and busier. The areas next to busy motorways are commonly avoided by large eagles. Also because of eco-tourism and 4x4 trails, more and more hiking paths and 4x4-tracks are created in remote areas where large eagles breed.

7. Powerlines cause electrocutions and collisions. Small distribution power line poles in the Karoo are avoided by the three large eagles because these poles kill them> Although large pylons can be beneficial for these eagles as hunting perched and as nest structure in treeless environments. Currently no completely effective mitigation method to prevent collisions.
8. Persecution Direct persecution of eagles such as Verreaux's Eagle and Martial Eagle for stock predation is still taking place, using gin-traps or rifles to shoot them.
9. Climate change - Droughts are expected to become more severe, this will further aid more and more over-grazing by domestic stock and affect the depletion of prey.
10. Renewable energy developments. Five operating and six new wind farms and two solar developments are proposed within the Cookhouse RED zone. These have implications on the existence of these eagles in terms of collision mortality with turbines and displacement due to permanent habitat transformation.
11. Farm properties under study (bird and bat studies) where new WIND FARMS are proposed, held the prospects of large financial benefits for landowners. These property owners will do anything to see this transpiring, therefore the existence of a historic/known eagle nest on such properties, might be a threat to such future WIND FARM. Therefore it is possible and has likely happened that farmers attempt to destroy such nests.
12. In contrast, neighbouring farmers get no financial benefits if their neighbour gets turbines and they not because of recommended eagle buffers, this situation can also result in the destroying of eagle nests.

With all the above considerations, it is easy to see that these long-lived (60years), slow-breeding (one chick every two years), large prey (lower numbers than smaller prey) eating eagles will need serious assistance with an effectively managed conservation plan when such WIND FARMS are authorized.

Below are recommendations:

1. The approval of wind and solar farms on private commercial farms can have many additional benefits for the environment and the farmer. Firstly the farmer will get substantial financial benefits, therefore before the authorization of such WIND FARM by DEA, the farmer should sign agreements that will benefit and promote the natural biodiversity of his property and the wider environment.
2. More restrictions on authorizing EIA applications for bush clearing for croplands, therefore less habitat loss.
3. Working for Water projects should be implemented to clear Acacia karroo thickets along the Greater and Little Fish rivers, therefore opening of rocky areas.
4. Also, with the approval of these proposed WIND FARMS and solar farms and the large financial benefits landowners will get, they can be less dependent on their agricultural activities for their existence. Therefore they can reduce their domestic stock numbers, which will benefit the environment largely in terms of soil conservation, water reduction, plant growth and the natural biodiversity, and this is likely to increase the prey base for the eagles.
5. Implement a 500x500m areas fenced area around known Martial eagle nests, to limit domestic stock of entering and ensure the growth and existence of thicket bush clumps. Such idea has been shared with farmers and with their positive agreements because they will do anything not to loose turbines, etc.
6. If possible, areas along major motorways and powerline corridors should be use for turbine and solar panel locations. Ensuring that not more natural habitats area changed.
7. Where possible, only existing powerline corridors should will be used, therefore the opening of new powerlines to be constructed should be limited.
8. The benefit of restricting over-grazing, will increase the natural prey base of damage-causing predators and large eagles, therefore farmers must sign agreements that they will never use chemicals to poison any animal or never use gin-traps, never kill/shoot any eagle on his farm. Or he will lose his wind farm concession,
9. Points No. 11 and 12 in the previous section is a very controversial issue and difficult to proof, it is therefore recommended that neighbours also get some financial benefit by ensuring the successful existence of an eagle nest or breeding site.

Appendix C - the Specialist's Declaration



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:	(For official use only)
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Proposed Frontier wind farm development, west of Grahamstown, in the Makana Local Municipality, Eastern Cape

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za


1. SPECIALIST INFORMATION

Specialist Company Name:	East Cape Diverse Consultants		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	1	Percentage Procurement recognition
			20
Specialist name:	Adri Barkhuysen		
Specialist Qualifications:	MSc		
Professional affiliation/registration:	Pr.Nat.Sc. 400/350/13		
Physical address:	34 Scanlen Street, Mount Croix, Port Elizabeth		
Postal address:	As above		
Postal code:	6001	Cell:	082 630 2448
Telephone:	041-373 2047	Fax:	n/a
E-mail:	adriba@telkomsa.net		

2. DECLARATION BY THE SPECIALIST

I, Adri Barkhuysen, declare that –

- I act as the independent specialist in this application;
- I will 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;
- 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 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;
- all the particulars furnished by me in this form 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.


Signature of the Specialist

East Cape Diverse Consultants
Name of Company:

1 Dec 2020
Date

Details of Specialist, Declaration and Undertaking Under Oath

Page 2 of 3

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, Adri Barkhuyzen swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

[Signature]
Signature of the Specialist

East Cape Diverse Consultants
Name of Company

1 Dec 2020
Date

[Signature] ¹¹⁸⁰⁵²² n. Compre
Signature of the Commissioner of Oaths

2020/12/01
Date

SOUTH AFRICAN POLICE SERVICE
COMMUNITY SERVICE CENTRE GEMEENSKAPSDIENS-SENTRUM
2020-12-01
STATION COMMANDER MOUNT ROAD
SUID-AFRIKAANSE POLISIEDIENS

Appendix D – the Specialist’s CV

Curriculum Vitae

Adri Barkhuysen

Date of Birth: 1 December 1959

Specialist Field: Avifauna

Consultant: Environmental Assessment Practitioner

Professional Natural Scientist: *Pr. Sci. Nat. (400350/13)*

Contact Details:

34 Scanlen Street, Mount Croix, Port Elizabeth 6001 Email: adriba@telkomsa.net

Tel: 041-373 2047

Fax: 041-991 0551

Cell: 082 630 2448

QUALIFICATIONS

MSc (Zoology) – University of Port Elizabeth – 2000-2002

MSc thesis - evaluate and compare the prey/food availability of eagles and large terrestrial birds that are prone to power line interactions – electrocutions and collisions - between transformed and untransformed habitats in a Karoo landscape near Somerset-East.

BSc Honours in Zoology – Potchefstroom University – 1998-1999

BSc Zoology and Botany – Unisa (part-time) 1990-1996

RELEVANT WORK EXPERIENCE

- 1994-2002: Volunteer Raptor Conservation Group of the Endangered Wildlife Trust (EWT).
 - 2002-2010: Field biologist with EWT in the Eastern Cape. Duties included: eagle/farmer conflict resolution, surveying and monitoring breeding success of Cape vulture for the Vulture Study Group and Black eagle for the Raptor Conservation Group.
- Project Coordinator of the Birds of Prey Working Group and Oribi Working Group for EWT in the Eastern Cape, which included various Oribi translocation initiatives to reintroduce Oribi into areas where it disappeared from.
- Since August 2010 to present: Environmental Consultant and bird specialist for East Cape Diverse Consultants.

BUSINESS PROFILE:

I am the Director and owner of East Cape Diverse Consultants CC (ECDC) since August 2010. The business provides a professional environmental consulting service to a wide variety of clients while I conduct regular assessments and studies as an avifauna specialist.

The income of ECDC is mainly generated from the cellular industry, as environmental assessment practitioner to obtain environmental authorization from competent authorities for projects that require basic assessment and EIA reports. But we supply services in the agricultural, power line and wind farm sectors.

CLIENTS:

Industry:

- Eskom Distribution Division - power line
- Eskom Transmission Division - power line
- Cellular - Vodacom, MTN, CellC and Telkom 8Ta
- Cellular – American Tower Company, Atlas Tower, Eaton Towers, BJB Project Services, Senzile Infrastructure Consultants, Analytics Hive.
- Wind farm - Newcombe Wind Developments and Woodlands Trust

Consultants:

- Bohlweki Environmental
- Royal HaskoningDHV
- JAH Environmental Consulting
- SKR Consulting
- Environmental CEN
- Wild Skies Ecological Services
- Ecology Consulting in the UK
- Phila Environmental Services

Our cellular clients and work include Vodacom, MTN, CellC, American Tower Company (ATC) and Telkom/8-ta, with projects in the Eastern Cape (and in the former Transkei region), KwaZulu-Natal (Zululand and Midlands) and Western Cape (south Cape region). These include the public participation process and visual impact assessments.

The agricultural work include, impact assessments for environmental authorization for a variety of projects, including:

- Centre-pivot irrigation development – dairy farming;
- Extension to Feathers Egg laying plant - poultry farming;
- Road and fire break – timber plantation;
- Culvert river crossing and soil erosion/stabilizing – dairy farming;
- Bush clearing – citrus farming;
- Charcoal/Briquette plant/factory

A variety of works, acting as Environmental Control Officer were completed, mainly for the construction of cellular towers.

Section 24G applications for non-compliance of NEMA environmental regulations by farmers/landowners. This sector of work was based in the Eastern and Western Cape Provinces.

An application for Sand Mining permits in the former Transkei to the Department of Minerals Resources. Water Use Licence Applications for landowners/clients to the Department Water and Sanitation in the Cacadu district region.

Secondly, my work as avifauna specialist, include conducting bird field studies and bird impact assessments for the wind farm industry, Eskom power lines, universities, environmental organisations and environmental consultants in the private sector.

Bird studies include:

- Bird Impact assessment desktop study for scoping report - for the proposed 400kV Eskom power line from Grassridge near Port Elizabeth to Poseidon substation near Bedford – for Bohlweki Environmental;
- Bird habitat assessment report for the existing 132kV Eskom power line to fit bird flight diverters from Grassridge to Humansdorp – for Royal HaskoningDHV;
- avifauna pre-construction monitoring for proposed wind farms;
 - Spitskop WIND FARM near Riebeeck-East - for JAH Environmental Consulting.
 - Banna Ba Pifhu WIND FARM near Humansdorp – for Woodlands Trust.
 - Roodeplaat WIND FARM near Uitenhage – for Newcombe Wind Developments.
- Bird Impact Assessment report for proposed wind powered generation facilities
 - Spitskop near Riebeeck-East with JAH Environmental Consulting
 - Banna Ba Pifhu WIND FARM near Humansdorp – for Woodlands Trust.
- Black eagle nest surveys and monitoring between Uitenhage and Steytleville during 2003 to 2007 for EWT;
- African Barred owl surveying project in the Albany district and in the former Transkei – 2007-2009 for EWT;

- Bird study - Jacobin cuckoo / Cape bulbul brood parasite field study at NMMU Reserve, Port Elizabeth - for Prof Oliver Kruger, Bielefeldt University, Germany;
- Monitoring of Cape vulture roosting and breeding colonies in the former Transkei 2006-2007 - for Dr Andre Boshoff of Nelson Mandela Metropolitan University;
- Bird Impact Assessment for the proposed Wing Park airstrip development EIA near Port Elizabeth - 2014;
- Large eagle nests and breeding success surveys and monitoring for Wild Skies Ecological services – 2013;
- Black eagle, African Crowned eagle and Martial eagle nest searching surveys and monitoring for the continuation of the EIA process of the proposed Roodeplaat WIND FARM - 2015-2018;
- Avifauna baseline assessment and a year pre-construction monitoring: for Transnet Manganese Export Terminal in the Coega IDZ and Port of Ngqura – Phila Environmental Services 2015-2016.

Other bird related work:

Professional assistance to American, Bill Clark, an author of a book on African birds of prey – 2007

Consultant for Birding EcoTours Chris Lotz – African Barred owl research and exploring – 2007-2009

Professional assistance to Marie-Sophie Garcia-Heras and Dr Rob Simmons from UCT on Black harrier research for her PhD - 2014

Professional assistance to Gareth Tate from UCT on Black sparrowhawk research for his PhD - 2014

Consultant for the Wildlife film makers – Talking Picture Films - 2003-2005 and Home Brew Films - 2016-2017

Professional assistance to Dr Guy Castley of the Griffith University, Australia with forest bird surveys and monitoring - 2017

Collaborations:

In the successful operation of our business, we employ the services of many professional scientists to conduct specialist studies, e.g. wetland ecologist Dr Brian Colloty, ecologist Jesse Jegles, plant specialist Dr Marietjie Landman, Jamie Pote, archeological Dr Billy de Klerk, Dr Celeste Booth, paleontological Dr Johan Binneman, Dr Francois du Rand, historians Gerrie Horn, etc. which broadens our understanding of sensitive sites or issues under assessment.

Other Environmental work:

Consultations with a variety of clients in the industrial/commercial sector for potential and future developments such as a hydroponic establishment, coal-driven electric generators, charcoal/briquette plant, poultry farming, fruit juice extraction plant, bird pest control, waste water analysis for a house hold chemical manufacturer, etc.

I am still regularly consulted on eagle/farmer conflict resolutions.

Appendix F - CHOJE ORNITHOLOGICAL MITIGATION PLAN AND METHOD STATEMENT: INITIAL DRAFT FOR CONSULTATION

The purpose of this document is to set out a framework to develop and agree mitigation measures and their implementation for the Choje wind farm cluster with stakeholders, including BirdLife South Africa, EWT and Vulpro. It is a working document that will be updated as the mitigation plan is developed. The mitigation package will be implemented to ensure that all of the Choje wind farms, alone and in-combination, do not result in any significant ornithological impacts. Implementation of these measures is considered to be a prerequisite for a positive Environmental Authorisation.

The ornithological assessments for these six wind farms have identified a range of key species of conservation concern that could be at risk from the developments, including:

- Martial Eagle
- Verreaux's Eagle
- Cape Vulture
- Secretarybird
- Blue Crane
- Ludwig's Bustard

The following potential impacts have been identified that could adversely affect these species:

- Collision with wind turbines
- Collision with overhead powerlines
- Electrocution on overhead powerlines
- Disturbance during operation
- Disturbance during construction/decommissioning
- Habitat loss through construction

The Mitigation Hierarchy is being followed during the development design process, sequentially reducing impacts through a process of avoidance, minimisation, mitigation, compensation and enhancement measures (CIEEM 2018).

Design Mitigation – Avoidance

Ornithological baseline data have been used to establish the optimal extent of turbine-free buffers around the most important centres of flight activity around key species' nest and roost sites, where flight activity was significantly higher than over the site as a whole.

- Verreaux's Eagle – 1.5km from nest sites (in line with BLSA recommended minimum buffer)
- Martial Eagle – 2.5km from nest sites
- Cape Vulture – 2km from main roost sites

These buffers were defined using the baseline survey data and spatial modelling of the key species' habitat preferences and flight densities in relation to distance from the nest (Verreaux's and Martial Eagle) and roost sites (Cape Vulture). Martial Eagle flight density was strongly related to distance from the nest, with the highest densities recorded within 500m and a steady decline in flight density up to 2.5km from the nest but beyond 2.5km flight density was consistently lower. This provided strong evidence to support a 2.5km turbine exclusion zone around Martial Eagle nests, as flight activity is clearly considerably higher within that zone. Any exclusion of turbines beyond 2.5km would be of much less benefit in reducing collision risk.

For Verreaux's Eagle, a buffer zone of 1.5km from nests was applied, in line with BLSA guidance, (BLSA 2017). The baseline data showed flight activity within the 1.5-3km zone around nests was not higher than that at greater distance from the nest, so extending a turbine-free buffer to 3km would not be likely to deliver any significant reduction in collision risk.

Cape Vultures did not breed within the survey area, so their flight distribution was not associated with any nest sites, but they were strongly associated with their night roost sites (with higher flight densities within 2km of the roosts). This distance was therefore applied as a buffer zone.

Design Mitigation – Minimisation

Amber caution zones have been identified around locations where turbines have been minimised, and where mitigation measures would need specific focus:

- Verreaux's Eagle – 1.5-3km around nest sites
- Martial Eagle – 2.5-5km around nest sites
- Large terrestrial birds (blue crane and bustards) higher density areas³

PROPOSED ORNITHOLOGICAL MITIGATION PACKAGE

Mitigation of the Construction Phase

The developer has committed to the production of a Construction Method Statement that would be agreed with BLSA and other relevant stakeholders before construction commences and would follow industry best practice.

Designated working areas, storage areas and access routes would be identified at the commencement of the construction phase. The proposed works will be phased so that access tracks are constructed early in the construction programme. Vehicular access would be restricted to designated routes throughout construction and operation as far as possible, thereby minimising potential disturbance of birds.

Several key species potentially vulnerable to construction disturbance were recorded during the surveys, including Verreaux's Eagle, Martial Eagle, Blue Crane and Secretarybird. These should not be disturbed at the nest site during breeding, particularly during the construction phase of the wind farm. Further surveys for these will therefore be undertaken immediately prior to construction if construction were planned for the relevant breeding periods. If any were found then potentially disturbing activities would be suspended until the breeding had been completed within an appropriate zone (dependent on the location of the birds and the species involved, to be agreed with BLSA). This would form part of a Breeding Bird Protection Plan.

Where a disturbance impact on nesting birds is possible, site ground works (i.e. laying of site tracks, laying out of the temporary construction compound and excavation of the turbine foundations and footings for the substation and meteorological mast) will be scheduled to take place where possible outside the breeding period. Where works affecting habitats that could be used by nesting birds must take place during the breeding season, they will only be carried out following an on-site check for nesting birds by an experienced ecologist. If this indicates that no nesting birds are likely to be harmed by the works, then the works will proceed.

If nesting birds are found to be present, work will not take place in that area until the adult birds and young have left the nest. A protection zone will be clearly marked around the nest site to prevent accidental disturbance or damage.

It is proposed to clearly mark the extent of the working area to minimise the risk of machinery

³ Areas of higher importance for cranes and bustards were identified from the 90% utilisation range of the blue crane and Ludwig's bustard, using kernel density estimation (Worton 1989), checked against the records from the other large crane and bustard species to ensure all important areas were included.

encroaching onto adjacent habitat. It is important to protect habitats adjacent to the working area, since they might be used by nesting birds.

Operational Phase Mitigation

Cape Vulture Collision Risk Reduction

1. Removal of suitable roost sites

Currently a string of powerline towers provides attractive roost sites for the vultures within the Choje West area, enabling them to access areas that otherwise they may not use (in the absence of natural cliff roost sites). These measures will reduce the availability of those artificial roost sites, through the fitting of anti-vulture perching measures on pylons, measures that are a proven and well-established management measure in South Africa. It is proposed that these should be fitted to all pylon towers within 5km of the proposed wind turbine locations.

2. Removal of vulture food resources within wind farm properties

A detailed carrion search management plan will be implemented for all farms associated within the wind and solar developments. This will involve weekly checks of all properties for dead stock animals, and removal of any carcasses located.

General Collision Risk Reduction

1. Increase turbine blade visibility

Recent trials of increasing blade visibility by painting one of the three turbine blades black have been successful in reducing collision risk to white-tailed eagles in Norway, a species that is known to be particularly vulnerable to collision (May *et al.* 2020). Collision risk to this species was reduced by 70%.

It is proposed that this mitigation measure will be initially trialled on turbines located in more sensitive areas, i.e. those within the amber zones defined above. Additionally, the trial will also include turbines within 5km of main vulture roosts. All these will have single black blades fitted during construction.

As this is a trial deployment, it will be monitored in detail to determine effects on bird behaviour and efficacy as a mitigation measure at this site.

2. Reduce overhead line collision risk

Bird flight diverters will be fitted onto all new 132kV and 400kV overhead lines within the project development footprint, in line with the measures recommended in the Eskom/EWT Wildlife and Energy partnership. Opportunities will also be identified where the same measures can also be retrofitted to existing overhead lines in areas with higher densities of species at risk of collision.

3. On-site Habitat Management

The raptor food resource must not become more attractive within the wind farm site, drawing foraging birds into the site, as this would increase collision risk. For instance, during access track construction, there may be periods of time where imported or excavated aggregate is stockpiled forming potentially attractive habitat for Rock Hyrax. During construction of the wind farm all mounds of aggregate or rocks which could serve as hyrax habitat will be removed prior to the commencement of operation of the turbines and through the operational phase of the wind farm. In addition, the proposed turbine bases should not serve as a refuge for small mammals, and thus the turbines themselves will not create attractive habitat for potential prey species such as hyrax.

4. Off-site Habitat Management

A management programme will be implemented to enhance the food resources away from the wind farms, to reduce eagle flight activity within those wind farms. Management measures that could improve raptor prey populations and habitat over a large area that, if managed appropriately, could deliver a net gain to the local raptor populations. A specific management plan will be drawn up and implemented to integrate the ecological requirements of the local raptors into the management of this area. Range management plans

will be developed for each Verreaux's Eagle and Martial Eagle range that could be affected by the developments, which will include measures to offset losses of existing range habitat through disturbance and direct loss to the developments. Measures to enhance local crane and bustard populations will also be implemented.

Collision Risk Management: Shutdown-on-Demand

As a further backup to ensure significant numbers of bird collisions do not occur at the site, a Shut-Down-On-Demand (SDOD) programme will be implemented for all six wind farms.

The initial focus of this work will be the higher risk areas, i.e. the amber buffer zones for Verreaux's and Martial Eagles (1.5-3km and 2.5-5km respectively), 2-5km buffer around Cape Vulture roosts, and the large terrestrial bird (blue crane and bustard) higher sensitivity areas.

This would then be extended as necessary over the site in an adaptive management programme, informed by the results of a collision monitoring programme.

Shutdown-on-demand is a proven method to reduce collision risk (BirdLife 2015). SDOD is currently being implemented in South Africa, for example at the Excelsior wind farm.

The base case for a SDOD scheme at Choje would be one using field observers to manually shut down turbines when 'at risk' flights of key species were identified.

Technology-assisted systems would also be investigated to develop the system further. Radar-based and camera imaging systems have both been shown to be effective (BirdLife 2015). Some systems are now fully automated, and have been successfully deployed, reducing eagle collision risk by 82% (McClure et al. 2020).

A successful SDOD system will need clear shutdown criteria. An initial precautionary approach is proposed, such that whenever any key species was seen within 500m of a wind turbine, at risk height, that turbine would be shut down until the bird had passed out of the risk zone. This process would be refined as more knowledge from the site was built up of the risk factors. And how best to manage these. It will initially include all key species, i.e. all species listed above, though this will be reviewed in light of the results of the system in operation.

Security of Mitigation

It is critically important that the delivery of the required mitigation package is guaranteed. It is proposed that this should be achieved through condition of consent but also through legal commitment for delivery. The mitigation package will be set out in a legally binding method statement when the measures are finalised, with the aim to achieve net zero loss of priority species through these innovative solutions and collaboration with stakeholders (including BLSA, EWT, and University research departments/institutes).

Measures to avoid construction disturbance

The implementation of turbine-free buffers in the areas of highest ornithological sensitivity means that specific measures to protect these areas from disturbance during construction should not be necessary (as those areas are already sufficiently buffered from disturbance). However, a watching brief will be maintained in case there are any changes that could result in any construction disturbance to nesting bird or bustard leks.

Monitoring of Mitigation Effectiveness and Ornithological Impacts

A detailed post-construction monitoring programme will be an essential and integral part of the mitigation package, to ensure that it both delivers the required results and is managed in the optimal way. This will include:

- comprehensive collision checks (on at least a weekly basis for an agreed sample of at least 25% of turbines, including all those within amber zones);

- monitoring of key species flight activity in/around the wind farm;
- key species nest site and breeding success;
- large terrestrial bird vehicle transects;
- Cape vulture roost counts;
- Monitoring of flight behaviour in relation to single black blade painting;
- Effectiveness of SDOD, including recording of near-misses and 'false positive' shutdown events;
- Monitoring of effectiveness of habitat management measures;
- Detailed tracking of key species, with specific tracking programmes using appropriate technology (e.g. fitting of GPS tags) to better understand flight behaviour in proximity to wind turbines, and also to test and develop the spatial modelling undertaken as part of the baseline assessment work.

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