



Overberg Lowlands Conservation Trust

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12.11.2015

To Whom It May Concern: RE: **Goereesoe Wind Farm: Comments on Appeal by iNca Energy**

In response to iNca Energy's appeal for reconsideration of their application to develop a wind farm on Goereesoe, Swellendam, we would like to reiterate our original comments on the EIA (see Appendix 1), while again emphasizing that this application should not be considered chiefly because i) the avifaunal assessments were flawed, ii) unsubstantial mitigation measures were put in place in the application, iii) the Cape Vulture has been up-listed to Endangered *internationally* and iv) iNca Energy's appeal is weak and does not change anything regarding the significant environmental impacts likely to occur should this development be approved.

Since our initial objection, the IUCN has up-listed the Cape Vulture from Vulnerable to Endangered. This is one of six African vulture species that has been up-listed *internationally* due to the suite of significant effects impacting on the future status of these important birds. To quote Dr Julius Arinaitwe: *"As well as robbing the African skies of one of their most iconic and spectacular groups of birds, the rapid decline of the continent's vultures has profound consequences for its people – as vultures help stop the spread of diseases by cleaning up rotting carcasses. However, now we are becoming aware of the sheer scale of the declines involved, there is still just enough time for conservationists to work with law-makers, faith-based organisations, government agencies and local people, to make sure there is a future for these magnificent scavengers."* (Taken from: <http://www.birdlife.org/worldwide/news/africa%E2%80%99s-vultures-are-sliding-towards-extinction-warns-birdlife>).

Given the severity of the existing threats facing these birds, we cannot condone knowingly adding another threat in the form of a wind farm within the range of an existing Cape Vulture colony. As has already been indicated and acknowledged by the DEA, it has been clearly stipulated in the SEA guidelines that no windfarms should be considered within 40 km of the specific Cape Vulture Colony at Potberg and Goereesoe falls 30km within this range. This colony is particularly important as it is one of the few that is actually producing young successfully. Because of this we have no way of predicting how these birds will be using the landscape in the next 20 years (i.e. within the lifetime of the wind farm).

In addition to these points, we have responded to each appeal statement made by iNca Energy in Table 1 below.

We sincerely hope that the Department of Environmental Affairs will adhere to its decision to reject this application, as there is very little evidence to suggest that this development would result in any positive impacts on the environment.

Thank you for considering our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read "O. Curtis". The signature is written in a cursive, somewhat stylized font.

Dr Odette Curtis

Director, Overberg Lowlands Conservation Trust

Table 1: our responses to the Appeal Response Report

<u>iNca Energy comments</u>	<u>Overberg Lowlands Conservation Trust Response to iNca Energy comments</u>
<p>1. Reason provided for rejection of the Authorisation - <i>The proposed site is unsuitable based on its proximity (30km) to the Cape Vulture breeding colony at Potberg and international experience shows that vultures are very vulnerable to collision with turbines and the impact would be very difficult to mitigate due to birds moving through the wind farm on a regular basis.</i></p> <p>The ground for appeal in this regard are as follows: Although the Cape Vulture was confirmed on the site, this was only from two sitings during the preconstruction bird monitoring which was completed in terms of the requirements of the Best Practice Guidelines. These two sitings were separated by almost a year, as detailed within the avifauna specialist report contained within Appendix H of the FEIR. The proximity of the site to the Potberg Vulture colony was not presented as a fatal flaw to the project. Therefore, it is considered that the above reason for rejection is not based on data presented within the EIA Report. Reference to 'birds moving through the wind farm on a regular basis' is clearly incorrect.</p> <p>ii. The proposed development site borders on the neighbouring Excelsior Wind Energy Facility. The Department has issued a positive Environmental Authorisation to this project, and the project has recently been awarded preferred bidder status in Window 4 of the REIPPP programme. The Department did not raise a concern with the proximity of the Excelsior WEF to the Potberg breeding colony, also within a 30km radius (as stated in Chapter 3 of the Final EIR of the Excelsior report). Therefore it is unclear why this approval did not also apply to the Goereesoe WEF project. The developer of the Goereesoe WEF has proposed various mitigation measures which will reduce the impact on the Cape Vulture (and other priority species) to an acceptable level.</p>	<p>This argument does not hold any ground, as i) we have already indicated that the Avifaunal report was flawed and carried out by people who are not qualified to make these assessments and ii) to corroborate this statement, the OLCT conducted a few days of field work on the site and recorded vultures on two occasions over a mere 6-hours of observations (see Appendix 1). These sightings, along with several others, strongly suggest that the avifaunal 'experts' were not thorough.</p> <p>The Excelsior development was approved long before the SEA document was drafted, thus the guidelines for future windfarm developments (and particularly the Potberg vultures) did not exist at the time.</p> <p>There is no 'acceptable' level of deaths to Cape Vultures and other red-listed species. This is borne out by the fact that the IUCN has recently raised the international conservation status of the Cape Vulture from Vulnerable to Endangered. As such, any colony of Cape Vulture that shows signs of population growth such as the De Hoop colony, should be accorded as much protection and support as possible.</p>
<p>2. Reason provided for rejection of the Authorisation - <i>The area is within an Important Bird Area (IBA) which supports abundance of bird species of conservation concern in the area.</i></p> <p>The ground for appeal in this regard are as follows: The developer has proposed a number of mitigation measures, including video surveillance systems such as DTBird at large additional cost to the developer which, when implemented, would reduce the impact on bird species to a level</p>	<p>While it is understood that the developer intends to institute mitigating factors, the proposed site's proximity to the Cape Vulture colony make it extremely unlikely that these measures will be effective. As stated previously Cape Vulture deaths can never be considered to be brought down to 'acceptable levels'. As indicated by the IUCN red-listing of Cape Vultures being raised to Endangered which</p>

<p>that would be acceptable, and are within the guidelines as proposed by the <i>BirdLife South Africa / Endangered Wildlife Trust Best Practice Guidelines for Avian Monitoring and Impact Mitigation at Proposed Wind Energy Development Sites in Southern Africa</i>. This is detailed within the avifauna specialist report (contained within Appendix H of the FEIR) as well as the FEIR main report.</p>	<p>highlights the importance of the Potberg colony as the only colony of Cape Vulture within the Western Cape Province and one of the few populations of Cape Vulture nationally that is increasing.</p>
<p>3. Reason provided for rejection of the Authorisation - <i>The proposed development falls within the 20km bufferzone of the De Hoop Guano Cave which qualifies as a major bat roost as it roosts abundant bat species.</i></p> <p>The ground for appeal in this regard are as follows:</p> <p>i. The bat specialist study included within Appendix I of the FEIR indicates that the site is considered to be mainly of moderate bat sensitivity. The proximity of the site to the De Hoop Guano Cave is not noted as a fatal flaw to the project. Therefore, it is considered that the above reason for rejection is not based on data presented within the EIA Report.</p> <p>ii. The proposed development site borders on the neighbouring Excelsior Wind Energy Facility. The Department has issued a positive Environmental Authorisation to this project, and the project has recently been awarded preferred bidder status in Window 4 of the REIPPP programme. The Department did not raise a concern with the proximity of the Excelsior WEF to the De Hoop Guano Cave (mentioned in the FEIR for the Excelsior WEF). The developer of the Excelsior WEF has proposed relevant mitigation measures that are not different from those proposed by the developer of the Goereesoe WEF.</p> <p>The developer is satisfied that should the mitigation measures be implemented, then the impact on bat species on the project site will be significantly reduced to an acceptable level. Therefore it is unclear why this approval did not also apply to the Goereesoe WEF project.</p>	<p>While not highlighted as a fatal flaw in the EIA report, this is the reason why other I&As have been given the opportunity to comment on the EIA to highlight gaps within the scoping assessments. This is borne out by mistakes that were identified in the avifaunal report. The De Hoop guano cave does house a variety of bat species including the <i>endemic</i> Cape Horseshoe Bat and should be considered a major bat roost due to the number of bats that utilise the cave as a roost. Furthermore the siting of the bat guano cave and the vulture colony on a Protected Area should take all aspects of habitat utilisation into account as well as threats both on and off reserve.</p> <p>The Excelsior development was approved long before the Goereesoe application was made. The assumption that this should be approved simply because of Excelsior's approval does not take into account the accumulative effects of multiple wind turbines in an extremely sensitive ecological area.</p> <p>It is vital that applications should be judged on a case by case basis and on the merit of each individual application.</p>
<p>4. Reason provided for rejection of the Authorisation - <i>Goereesoe comprises one of the largest and most intact remnants of Critically Endangered Eastern Rûens Shale Renosterveld and it forms part of the CapeNature Protected Area Expansion Strategy.</i></p> <p>The grounds for appeal in this regard are as follows:</p> <p>All turbines and new access roads that were placed in these areas where remnants of the Eastern Ruens Shale Renosterveld could potentially be found have been relocated as per the nominated layout in the Final EIR report. Therefore, no turbines will impact on the Eastern Ruens Shale Renosterveld. This reason for rejection of the project is therefore considered to be inaccurate.</p>	<p>One cannot separate the impacts on these renosterveld remnants by looking at threats inside and adjacent to the remnants.</p> <p>Relocating turbines and roads off the renosterveld remnants and onto the edges of these remnants or within close proximity to these remnants does not mitigate for the impacts on, for example pollinators (invertebrates, birds), which need to move across the transformed landscape between remnants. Such movement is part of the ecosystem processes which are critical for the long-term survival of these remnants, thus we cannot assess these impacts in isolation from the entire ecosystem.</p>
<p>5. Reason for rejection – <i>no alternative location for the proposed wind</i></p>	<p>Given the SEA guidelines which were available to developers at the time of this application, one would</p>

<p><i>energy facility has been investigated in the EIA dated February 2015. The grounds for appeal in this regard are as follows: In its decision, the DEA states that ‘the motivation provided as to why the EIA did not adequately address location alternatives is deemed sufficient as there were no other reasonable and feasible alternative locations and the current site has a good resource’. This is contradictory to the reason for rejection as stated above. It is further submitted that, should the Department have required that an alternative site be investigated for the project, this should have been raised in the Acceptance of Scoping letter received for the project. This was not the case and therefore it is considered undue process that this be cited as a reason for rejection of the project.</i></p>	<p>have expected that an alternative location, away from the high risk zone for Cape Vultures, would have been investigated. We support the response by DEA.</p>
<p>6. Reason for rejection – <i>It is noted that the revised layout will unlikely alter the findings that the proposed Goereesoe Wind Energy Facility is deemed to be a fatal flaw due to avifaunal and botanical reasons. The grounds for appeal in this regard are as follows: The EIA studies did not identify any fatal flaws to the project. Specifically, it was concluded that ‘Should mitigation measures in the EMP be adhered to, impacts on the identified sensitive areas can be adequately managed’. As the recommended preferred layout for the facility avoids impacts on natural vegetation, it is unclear why the DEA is of the opinion that the project is fatally flawed for botanical reasons.</i></p>	<p>We support DEA’s response here and again reiterate that the avifaunal report was too flawed for any mitigation measures to carry any weight. Therefore any relocations of the turbines close to this Critical Biodiversity Area will not reduce the environmental impacts - particularly those affecting birds and pollinators which are an integral part of the healthy functioning of the ecosystem as a whole.</p>

APPENDIX 1: OLCT original comments submitted to DEA on the Goereesoe EIA



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12.01.2015

To Whom It May Concern: RE: **Goereesoe Wind Farm: Comments on EIA**

I hereby submit comments, on behalf of the Overberg Lowland Conservation Trust, regarding the EIA undertaken by Savannah Environmental Pty. Ltd. for the proposed windfarm development at Goereesoe farm, south of Swellendam, Overberg.

I have 10 years of experience working in the Renosterveld of the Overberg, where I did my MSc on Black Harriers and my PhD on Renosterveld management. I have worked with landowners in the area on stewardship as a consultant to CapeNature, and I have continued this line of work by establishing the Overberg Lowlands Conservation Trust – an NGO (NPO) dedicated to the conservation of Renosterveld and other threatened lowland habitats in the Overberg. We work closely with existing conservation organisations in the region, including CapeNature, Birdlife South Africa and WWF-SA.

There are many flaws, misidentifications, and methodological problems in the avian report and some of the recommendations made in the specialist reports (Avian, Faunal and Botanical) are not accurately reflected in the draft EIA. This makes the draft EIA report inaccurate and flawed and it is our contention that this makes the Goereesoe wind farm untenable.

BOTANICAL ASSESSMENT

- To reiterate this report, the vegetation type here is all Critically Endangered Eastern Rûens Shale Renosterveld, with quartz-silcrete outcrops, as well as some patches of Rûens Silcrete Renosterveld. The quartz outcrops were recently described as comprising unique, species-rich vegetation communities, which are also home to six newly-discovered species (Curtis *et al.* 2014, Goldblatt *et al.* 2014). Goereesoe is a hotspot for these quartz patches and contains some of the most intact and biodiversity-rich Eastern Rûens Shale Renosterveld remaining today. This is not emphasized sufficiently in the draft EAI report by Savannah. References for these papers are:
 1. Curtis, O. E., Stirton, C. H., Muasya, A. M., 2013. A conservation and floristic assessment of poorly known species rich quartz-silcrete outcrops within Rûens Shale Renosterveld (Overberg, Western Cape), with taxonomic descriptions of five new species *S.A. Journal of Botany* 87: 99-111.

2. Goldblatt, P., Manning, J. C., Curtis, O. E., 2013. A new species of *Hesperantha* Ker Gawl. (Iridaceae: Crocoideae) from the Overberg, Western Cape, and observations on a novel mode for pollen transfer in the genus and family by a hesperid butterfly. *Bothalia* 43 (2): 2011-2014.
- NO turbines, cables or any other development should be allowed on, or through, a SINGLE patch of natural vegetation, under ANY circumstances, **because it is illegal to do so within Critically Endangered vegetation types** (see NEMA and CARA).

BIRD ASSESSMENT

- The Bio-Insight Bird Report contains many flaws and irregularities, which make the credentials of this report questionable. Additionally, where Bio-Insight makes important or relevant statements regarding potential impacts on birds, these are not always accurately reflected in Savannah's EIA. For example, the Bio-Insight report mentions that the Black Harrier was observed on several occasions throughout the year, in close proximity to some of the turbine locations (page 2 Bio-Insight Report) and they go on to say this 'presented medium to high collision risk behaviours in the area'. However, in the draft EIA report, it states 'from the proposed layout, none of the turbines are placed within the assessed high collision risk areas (page 135, table 'Mitigation')'. The Bio-insight report shows that the proposed turbines overlap very closely with observations of threatened species, such as the Black Harrier, and states that turbines should be moved.
- It should be noted that the proposed status of the Black Harrier for the new (South African) Red Data listing is *ENDANGERED*. With less than 2000 birds in the world's population, this is extremely significant. Savannah still refers to the old status (*Vulnerable*) of this species in their summary. This means they have devalued the importance of this rare endemic.
- In their report summary, Savannah notes that "The preconstruction monitoring confirmed the site to be of low sensitivity from an avifaunal habitat perspective since the site (and the general surrounding area) is heavily transformed by agriculture." This statement is biased and shows the lack of local knowledge and understanding of the ecosystems in the Overberg. Firstly, the renosterveld on Goereesoe and the 'general surrounds' (particularly south and east of Goereesoe) is part of the largest cluster of Eastern Rûens Shale Renosterveld remaining on earth. For this reason, it is part of a cluster identified as a top priority on CapeNature's Protected Area Expansion Plan and the Lowlands Report (Von Hase *et al.* 2003), as well as the OLC's (Overberg Lowlands Conservation Trust) conservation strategy for the De Hoop-Rûens Cluster. With an estimated 4-6% Renosterveld remaining on Earth, an area of veld as large as that found on Goereesoe is highly significant. Secondly, the fact that much of the landscape in this region is severely transformed does not mean that it is not important for wildlife (avian and other) conservation. Many species have benefitted from these habitat changes: most notably, the threatened Blue Crane. This has meant that the Overberg's wheat-belt has become a stronghold for this species, which would otherwise have become far more threatened, due to severe habitat transformation (afforestation) of its natural grassland habitats in the karoo and highveld. Also, Bustards and several raptors make use of these lands for foraging, so they are by no means devoid of bird life. Therefore, to make a blanket statement about the value of these habitats for bird conservation is incorrect.
- **The SEA Report stipulates that no wind farms should be developed within a 40km radius of the Potberg Vulture Colony.**
http://www.csir.co.za/nationalwindsolaresea/docs/3_SEA%20Negative%20Mapping.pdf The sites proposed at Goereesoe fall within 30km of a breeding colony of Cape Vultures. Also, it is noted in the bird report (page 20) that Cape Vultures at Potberg are known to forage 30-40km away from the breeding colony. Goereesoe falls well within

this foraging range (as pointed out in Bio-Insights’s bird report) and any wind farm developments here are potentially harmful to this vulture colony. This is particularly significant because this is the only colony of endemic Cape Vultures in the country that is known to be healthy and growing (all other colonies are either stable or declining). Observations confirm that Cape Vultures have been recorded within the Bird Atlas pentad (SABAP 2 data), but the Bio-Insight bird observers only recorded a vulture 3km away from the proposed development. However, the Bird Report states: ‘as Cape Vultures were not observed using the development area, it is not expected that a direct collision impact will occur.’ This is an unacceptable conclusion: the fact that Cape Vultures were not recorded by Bio-Insight in the proposed development area does NOT mean that collisions will not occur. In any event, this is irrelevant at this point: according to the SEA recommendations, **this site is completely unsuitable, based on its proximity to the Cape Vulture colony.**

Additionally and most importantly, I personally conducted bird surveys on Goereesoe over the 8th, 9th and 10th January 2015 (for only two hours per day) and observed five vultures flying over the WEF area on two occasions on the second day of observing. These birds were often observed at ‘rotor height.’ Again, the fact that I observed these birds over such a short observation time makes the observations and conclusions by Bio-Insights very weak.

- Jenkins *et al.* (2012) recommend 12 hours (‘one full day’) per vantage point (VP) per season as a minimum observation time for assessments. The bird report is based on an average of only 9 hours for each VP per season (page 32 of Bird Report), which means there is a higher likelihood that the rarer species (e.g. Cape Vulture) have been under-recorded.
- Several species that are not known to occur in the Overberg have been recorded in the bird study, while several common species appear to have been missed (Appendix 2 of the Bird Report). This makes the entire report and its conclusions questionable. The most glaring example is the Black-Chested Snake Eagle which has never been recorded in the Overberg, according to the most recent SABAP2 data. The Bird Report refers to this species as ‘uncommon to locally common’, again suggesting that the field observers were inadequately qualified to carry out this study. There are several additional inconsistencies in this report and for this reason, I have tabled some of the most obvious ones:

Table below: *Species not recorded in the Bird Report which are COMMON in the area (from my own observations over the last decade and confirmed on two site visits over 8th and 9th January 2015):*

Grey-winged Francolin	Common
Helmeted Guineafowl	Very common (seen 8 Jan)
Common Quail	Seasonally Common
Hadedda Ibis	locally common (mentioned in text but not in Appendix)
Egyptian Goose (missing from WEF)	Very Common – pest status (seen 8 & 9 Jan)
Red-knobbed Coot	Common on farm dams (seen 8 Jan)
Cape Turtle Dove	Ubiquitous on all farms (seen 8 Jan)
Red-eyed Dove	Common
Acacia Pied Barbet	Common
African Pipit	Common (heard 8 Jan)
Agulhas Long-billed Lark	Common (mentioned in text but not in Appendix) (heard 8 Jan)
Grassbird	Common in natural Renosterveld (heard & seen on 8 & 9 Jan)
Cape Bunting	Common (heard & seen 8 Jan)
Cape Sparrow	Common
Large-billed Lark	Common
Southern Black Korhaan	Locally Common in large areas of renosterveld

Table below: *Species recorded in the Bird Report which are NOT known to occur in the area:*

Black-Chested Snake-Eagle - no records from SABAP 2
Common Whimbrel highly unlikely on farm dams
Purple Swamphen highly unlikely on all but the most vegetated wetlands
African Rail - impossible on open farm dams
African Painted Snipe – not likely
Ground Woodpecker – not possible
Olive Woodpecker – unlikely in open renosterveld

- The fact that, for example, Southern Black Korhaan, Large-billed Lark, Greywing Francolin, etc., were not recorded at all (or very seldom) suggests that the observers did not know their bird calls and therefore missed these species, as these are known to occur throughout the region and particularly, in these Renosterveld habitats.
- Several species that are discussed in the text are not included in the final Appendix of the species recorded in the study area (Appendix 2). This raises questions as to how this Appendix was generated and suggests a 'cut and paste' job. For example, the following species are discussed in the text (as having been recorded), but are not listed on the final list on the Appendix 2: Blue Crane, Hadeda Ibis, Agulhas Long-billed Lark, African Fish Eagle, African Marsh Harrier, Denham's Bustard, Secretary Bird, Grey-winged Francolin and others.
- Black Stork is not mentioned in the discussion, but is recorded for both the WEF and the control (Appendix 2). White Stork is mentioned in the discussion, but is not recorded in the WEF according to Appendix 2. (White storks are common in the Overberg wheat belt after rains while Black Storks are rare).
- The Bio-Insight report claims that Black Harriers are unlikely to breed in the WEF area, or surrounds. This is incorrect. I have observed the species displaying over the Renosterveld on Goereesoe on several occasions in the past (having done incidental gamebird and botanical surveys on this site since 2007). On 8th, 9th and 10th January 2015, I visited the Goeresoe WEF area and a Black Harrier was observed flying at rotor height for a minimum of 40 minutes during the 2-hour visit on the 8th, as well as for about 20 minutes during a 2-hour visit on the 9th, again suggesting a territorial and post-breeding bird. On the 10th, I witnessed a food pass between a male and female Black Harrier, and subsequently located the nest site (see photographs below). It appears that the pair has fledged at least one chick from this site. The male also alarm-called when I approached the nest. This confirms that the species DOES in fact breed at the site. My previous work has shown that Black Harriers only breed in the largest and most 'intact' Renosterveld remnants (which are rare due to extreme levels of habitat transformation in the Overberg) and Goereesoe is one such remnant. Given the number of inconsistencies in the Bird Report, I would also question the ability of the field observers to locate a harrier nest – something which requires much experience with this species.
- Appendix 5, page 104 refers to 'grassland' as the surrounding habitat – this is incorrect. The surrounding vegetation is RENOSTERVELD. There are NO grassland vegetation types in the Overberg. These basic errors further testify to the fact that the Bio-Insight 'experts' are not familiar with the ecology of this region.

Table below denotes the species recorded during three visits to the WEF site at Goereesoe, by myself, on 8th, 9th and 10th January 2015. Observations were generally made between 11h00 and 14h00 each day, for an average of two hours. These observations emphasize the diversity of species recorded over a very short period of time – several of these were missed in the Bio-Insight report, making the accuracy of their report questionable. Red Data species and collision-prone species are highlighted in red. **SIX of the top 25 collision-prone species were observed flying within the WEF, during a total of only six hours of observation.**

Species	Notes
Cape Turtle Dove	Common
Cape Spurfowl	Common
Fiscal Shrike	Common
Spurwing Goose	Abundant
Yellowbilled Duck	Common
Egyptian Goose	Abundant
Steppe Buzzard	Common
White-breasted Cormorant	
Red-knobbed Coot	
Little Grebe	
Reed Cormorant	
Cape Crow	
Karoo Scrub Robin	Common
Grey Heron	
Familiar Chat	
Yellow Canary	
Karoo Prinia	Common
Grassbird	
Barn Swallow	Abundant
Agulhas Longbilled Lark	
Grey-backed Cisticola	
Lesser Double-collared Sunbird	
Cape Bunting	
Speckled Mousebird	
Fiscal Flycatcher	
Yellow-billed Kite	
Crowned Plover	
Black Harrier	Territorial and post-breeding behavior observed. ENDANGERED.
Jackal Buzzard	Common, ENDEMIC
Orange-throated Longclaw	
Bokmakerie	
Blue Crane	VULNERABLE
Denham's Bustard	At least 3 individuals sighted, VULNERABLE
Greater Striped Swallow	Common
Alpine Swift	Common
Booted Eagle	
Cape Vulture	Two sightings of at least five individuals ENDANGERED
Lanner Falcon	1 Juvenile VULNERABLE
Secretarybird	1 PAIR, VULNERABLE



Photographs above were taken at Goereesoe WEF area between 8th and 10th January. From the top, starting on the left: Black Harrier nest, Black Harrier female carrying prey delivered by her mate, Black Harrier nest site in relation to the Renosterveld slope, a pair of foraging Secretarybirds and a Cape Vulture.

FAUNA REPORT:

The Fauna Report is very thorough, but was naturally limited by the amount of field work undertaken in the study, as well as the fact that nocturnal species were not able to be confirmed. We, the Overberg Lowlands Conservation Trust, are responsible for the management of a property (Haarwegskloof), owned by WWF, of the same vegetation type and quality, <10 km away from Goereesoe. We have undertaken several faunal surveys (through camera traps and trap arrays) and have recorded the following noteworthy species: Aardwolf, Aardvark, Honey Badger, Rain Frog (*Breviceps rosei vansonii*), Robertson Dwarf Chameleon. The former two are extremely rare in the Overberg and the presence of these species is considered an indicator of high habitat quality and ecosystem integrity (particularly due to their dependence on termitaria). Because of the similarity of habitats on these two farms which are in close proximity to one another, these species almost certainly occur at Goereesoe.

This report also emphasizes the need to keep all developments away from the *Critically Endangered* Renosterveld remnants and this not emphasized sufficiently in Savannah's recommendations.



Photographs above are taken with camera traps placed at Haarwegskloof Renosterveld Reserve, about 10km away from Goereesoe, showing an Aardvark (left) and an Aardwolf (right), confirming that these locally threatened (within the Overberg) species are dependent on these remnants for survival.



Photographs above: Robertson Dwarf Chameleon and Breviceps Rain Frog, photographed at Haarwegskloof Renosterveld Reserve, about 10km away from Goereesoe.

OVERALL RECOMMENDATIONS BY SAVANNAH:

- The statement made by Savannah at the end of their report is very biased and has no place in a report of this nature: “The proposed development represents an investment in clean, renewable energy...” This demonstrates Savannah’s bias towards supporting windfarm developments, in spite of the red flags raised in the bird, and plant reports for this development. No environmental practitioners should display any bias in favour of any developments!
- Under ‘Overall recommendation’:
 - Savannah state: “Following the final design of the facility, a revised layout must be submitted to DEA for review and approval, prior to commencing with construction”. This is unacceptable. Should this development go ahead, ALL Interested and Affected Parties should be invited to comment on the final layout.
 - The fact that any moving of threatened or TOPS species is suggested as a possibility is unacceptable in a *Critically Endangered* habitat. The turbine and its footprint should instead be moved away from such threatened habitat just as farmers wishing to plough virgin Endangered or Critically Endangered habitats are prohibited under the NEMA and CARA legislation.
 - The report recommends that bird detection systems are in place as a mitigation ‘due to species of conservation concern associated with natural areas.’ What about species of conservation concern associated with transformed areas?! E.g. Blue Crane, Lanner Falcon, Denham’s Bustard, etc.
 - The statement, ‘Make use of existing roads as far as possible’ is open-ended and does not define clearly where additional roads would be acceptable. Additional roads would be completely unacceptable in any Renosterveld areas.
 - It is not defined how disturbed areas should be ‘rehabilitated.’ It is generally accepted among ecologists that once Renosterveld is ploughed, the diversity is essentially lost for good. Therefore since Renosterveld, cannot be rehabilitated to its former levels, rehabilitation cannot be considered a mitigation measure.
- On page 5 of the draft EIA report, it states that ‘no environmental fatal flaws were identified to be associated with the site at the scoping phase of the process.’ Given that more thorough reports from specialists are available at the EIA stage and they point out that the Renosterveld habitat here is Critically Endangered, and that the site falls within 30km of a vulture colony, means that a fatal flaw has now been identified. Thus the scoping report is irrelevant at this stage (particularly given how poor it was) and should not carry any weight in the final EIA.
- Even though Savannah have agreed with Bio-Insights recommendations that turbines should be moved from their proposed positions, this does not go far enough in saying that they cannot under any circumstances, be placed within *Critically Endangered* habitats, or within the foraging range of the Cape Vultures. These two factors alone should prohibit any further consideration of this site for a windfarm development.
- Other concerns not taken into account include:
 - Since Goereesoe comprises one of the largest and most intact remnants of Critically Endangered Eastern Rûens Shale Renosterveld AND it forms part of the CapeNature Protected Area Expansion Strategy, why is it not recommended as a **Stewardship** site, should this development proceed? The Renosterveld on Goereesoe ranks as some of the most intact and biodiversity-rich Renosterveld that remains in the Overberg. It is currently not protected

or managed for biodiversity and this should be recommended as a primary and critical mitigation, should this development go ahead.

- There is no mention of any **Biodiversity offsets** in this report. This is surely something that needs to be considered, should this development be approved, given the critical conservation status of the natural vegetation type present, as well as the potential avian impacts. Therefore, I would like to reiterate that we recommend that in the very least, the DEA insists that the landowner sign the property up as a Stewardship site with CapeNature, should this be approved.
- **Fire management:** Renosterveld requires ecological management burns. Will these be permitted alongside such a development? Will financial assistance for ecological management be provided by the landowners or the developers? This is particularly relevant if the Renosterveld were to become a contract Nature Reserve through CapeNature. It is my experience that farms with an Eskom servitude are restricted in terms of obtaining Eskom's permission to burn Renosterveld under Eskom power lines, due to potential risks to the power lines. Therefore, my concern is that if these wind turbines were to be constructed on, or near to, Renosterveld, the future management of this veld will be compromised. Given how little Renosterveld remains and the importance of management of the remaining remnants (Curtis 2013), it is highly recommended that no development which will directly impact on the Renosterveld or associated management requirements, be approved by the DEA.

In conclusion, we are very concerned about the quality of Bio-Insight's Bird Report, due to inconsistencies in the report. However, we are equally concerned that the final EIA by Savannah overlooks some relevant findings in the Faunal, Botanical and Bird Reports and therefore, downplays the potential impacts of this development on some important and threatened species, as well as overall ecosystem functioning. Savannah's bias towards supporting this development is questioned here too.

We are against the development of this windfarm at this particular location, due to its potential impacts on several avian species, most notably the Cape Vultures and Black Harriers, as well as the direct and indirect impacts on the Renosterveld (through destruction of virgin land and the long-term impacts on management of the site respectively). However, we are aware that due to pressures to source alternative forms of 'renewable' energy, Government may approve this development. If this were to happen, we strongly recommend i) a more interactive and inclusive process, in terms of designing the final layout of the wind farm and ii) the process for declaring the site a Contract Nature Reserve through CapeNature's Stewardship Programme is started immediately.

To end with, I have tabulated the major flaws identified in this EIA, which reiterate that this development should not be permitted in any way, shape or form, irrespective of how turbine placement is altered within the WEF.

Table below summarizes the fatal flaws identified in the EIA by Savannah.

Flaw	Notes
Development proposed on, or close to, Critically Endangered Renosterveld habitats.	According to existing legislation, this should immediately prohibit any development on the natural vegetation at this site.
Development is 30km within the foraging range of the Cape Vultures, breeding at Potberg.	According to the SEA Report, Jenkins recommends that NO windfarms should be considered within 40km of the Potberg Cape Vulture breeding colony.
High collision-risk species, of conservation concern (i.e. TOPS species), often recorded flying at rotor height within the WEF.	Species include: Denham's Bustard, Secretarybird, Cape Vulture, Black Harrier, Blue Crane.
This development is a major risk to ecosystem functioning and biodiversity in one of the richest and most important conservation areas in the Overberg wheat-belt.	With <4-6% remaining, securing and maintaining remnant Renosterveld for long-term conservation is critical. The synergistic impacts on threatened habitats, threatened plants, high-risk and threatened mammals and birds will have an overall negative, and likely highly significant, impact on the ecosystem functioning and therefore integrity of one of the most important areas for Renosterveld conservation in the Overberg. This is completely unacceptable in a system which is already teetering on the brink of extinction.

Please feel free to contact me should you have any queries. I have known eastern part of this site (i.e. the Renosterveld on the eastern side of the R319) since 2007 and am very familiar with the conservation importance of this site.

Yours sincerely



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