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67 African Street
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DEFF Reference: 14/12/16/3/3/2/1131
ECPTA Reference: EIA/2018/021

FOR ATTENTION: MS CAROLINE EVANS

Delivered by email: evans@cesnet.co.za

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED ALBANY WIND ENERGY FACILITY NEAR MAKANDA, EASTERN CAPE

Dear Ms Evans

Thank you for providing the Eastern Cape Parks and Tourism Agency (ECPTA) with the opportunity to provide comment on the draft Environmental Impact Report (EIR) for the proposed Albany Wind Energy Facility (WEF) within the Makana Local Municipality. As per the mandate of the ECPTA, the Agency is responsible for developing and managing protected areas, as well as promoting and facilitating the development of tourism in the Province. Relating to the mandate of the ECPTA, we would like to raise the following comments/concerns:

Visual Impact: The agency has concerns regarding the visual impact of the proposed facility on ECPTA managed nature reserves. The current visual impact assessment excludes various visual receptors within Great Fish River and Waters Meeting Nature Reserves as selected sensitive receptors. This is a concern for the agency and no indication is provided that necessitated the exclusion of ECPTA nature reserves from the analysis. The turbines will be visible from various key strategic tourism nodes within the Great Fish River Nature Reserve, these include Adams Krans, Grasslands, game-drive loop as well as the bird hide. The turbines will also be visible from key tourism facilities at Waters Meeting Nature Reserve which was also not included in the visual impact analysis.

Avifaunal Impact: The agency is concerned particularly in regards to the Turbines that are in close proximity to Beggars Bush Nature Reserve. As noted within the Avifaunal Impact



Assessment, there are a number of species that utilise the forest as well as the airspace around the nature reserve. It should be noted that there are sightings of the Martial Eagle and Jackal Buzzard around Beggars Bush and adjacent turbines could have direct impact on these species. The fact that the specialists could not determine breeding patterns of Martial Eagle within the area should not be translated as being non-existent as historical breeding is noted. Based on the threat status of the species, care/caution should be taken to avoid known areas used by the species to avoid further decline, particularly adjacent to Beggars Bush.

Page 99: On this statement: *“Disturbance of birds is rated as “LOW NEGATIVE significance”, on account of there being no known breeding sites of sensitive bird species on or near site. No specific mitigation is required.”* The fact that no breeding sites are known for the area should in no way imply that caution should not be taken and the EMPR should address the approach to be followed should the breeding sites be discovered at a later stage. Further, the avifaunal assessment outlines the limitation of flight height data for each of the noted species and this should have been addressed as part of the assessment particularly for this type of project.

Should you wish to discuss the above, please do not hesitate to contact the Mr Kagiso Mangwale, (Email: kagiso.mangwale.co.za)

Yours sincerely



Vuyani Dayimani
Chief Executive Officer
EASTERN CAPE PARKS AND TOURISM AGENCY

14 July 2020

Date

