Appendix D2: Updated Biodiversity Assessment and Botanical Scan Addendum (2017)



ADDENDUM

TO THE BIODIVERSITY ASSESSMENT & BOTANICAL SCAN

for the,

VANRHYNSDORP SOLAR PROJECT

A re-assessment of the area that will be impacted by the proposed solar project at Vanrhynsdorp, Western Cape Province.



DATE: 20 June 2017

PREPARED BY: PB CONSULT

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SUMMARY - MAIN CONCLUSIONS

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MAIN VEGETATION TYPE(S)		vation targets not yet achieved (it is however, unclear what Knersvlakte Nature Reserve had, had on conservation targets		
located within an ecological larger area is not essential for supporting the functioning of CBA 1 areas is to maintain the be acceptable, provided the not compromised. The site is still covered by not ascertain, it is likely that the reason for the low species displacements.		be Biodiversity Spatial Plan (Figure 4) the proposed site will be support area (ESA 1), identified as a water recharge area. The meeting biodiversity targets, but can play an important role in protected areas or critical biodiversity area. The objective for e areas in a functional near natural state. Some habitat loss may inderlying biodiversity objectives and ecological functioning are tural veld dominated by Gannabos. Although it is difficult to eld has been impacted by domestic livestock grazing (a possible ersity — apart from the recent drought). However, because of its ion next to transformed land (vineyards), it is unlikely to result in		
CENTRES OF ENDEMISM	However, the proposed develor quarts-field flora and although i geophyte flora (which can result	2001) the site falls within the Knersvlakte Centre of Endemism. oment is located on the sandy soils to the south of the true it is likely that the veld will support a number of annual and in spectacular flower displays in spring after good rains), it is opment (given its relative small size and location) will result in		
LAND USE AND COVER		mpact on a small area used for grazing by the landowner. Loss		
SIGNIFICANT PLANT SPECIES	No species protected in terms of	rcountered (Refer to Heading 5.3.1). f NEM: BA encountered (Heading 5.3.2). f the NFA were encountered (Heading 5.3.3).		
IMPACT ASSESSMENT Significance before mitigation: The impact assessment suggests have a Low cumulative impact, von vegetation type, corridor and evaluation takes into account or location adjacent to existing agriculture. Since the proposed development is great potential for micro-adjual already considered low it will significance through layout adjupotential impact on the region features (e.g. corridor function of loss, habitat-loss, connectivity		s that the proposed Vanrhynsdorp development is expected to with the most significant aspect being the low potential impacts conservation priority areas, flora and accidental veld fires. The in the relative small size of the proposed development and its icultural land (transformed land). It footprint needs only be approximately 50% of the 20ha, there ustment of the final layout plans. Even though the impact is itill be possible to reduce direct impacts on other features of justments, search & rescue and topsoil management. The hall status of the vegetation type and associated biodiversity or special habitats) is considered low. No irreversible species-or associated impact can be foreseen from locating and the proposed site. With mitigation the impact on biodiversity		

SUMMARY & RECOMMENDATION

<u>The NO-GO option:</u> The "No-Go Alternative" alternative will not result in significant gain in regional conservation targets, the conservation of rare & endangered species or gain in connectivity. At the best the No-Go alternative will only support the "status quo" on the site. On the other hand the pressure on Eskom facilities, most of which is currently still dependant on fossil fuel electricity generation, will remain. Solar power remains a much cleaner and more sustainable option for electricity production.

Having evaluated and discussed the various biodiversity aspects associated with the development, the most significant impacts are expected to be the potential impacts on:

- The ecological support area;
- The Knersvlakte Centre of Endemism:
- The small potential impact on conservation worthy plants relating to potential reddata species not visible during the two site visits (e.g. annuals and bulbs).

However, it is considered unlikely that the proposed project will contribute significantly to any of the following:

- Significant loss of vegetation and associated habitat in terms of local or national conservation targets;
- Loss of ecological processes (e.g. migration patterns, pollinators, river function etc.)
 due to development and operational activities;
- Significant loss of local biodiversity and threatened plant species;
- Significant loss of ecosystem connectivity (e.g. corridor function).

WITH THE AVAILABLE INFORMATION AT THE AUTHOR'S DISPOSAL IT IS RECOMMENDED THAT THE DEVELOPMENT BE APPROVED, BUT THAT ALL MITIGATION MEASURES DESCRIBED IN THIS DOCUMENT BE IMPLEMENTED.

INDEPENDENCE & CONDITIONS

PB Consult is an independent consultant and has no interest in the activity other than fair remuneration for services rendered. Remunerations for services are not linked to approval by decision making authorities and PB Consult have no interest in secondary or downstream development as a result of the authorization of this proposed project. There are no circumstances that compromise the objectivity of this report. The findings, results, observations and recommendations given in this report are based on the author's best scientific and professional knowledge and available information. PB Consult reserve the right to modify aspects of this report, including the recommendations if new information become available which may have a significant impact on the findings of this report.

RELEVANT QUALIFICATIONS & EXPERIENCE OF THE AUTHOR

Mr. Peet Botes holds a BSc. (Hons.) degree in Plant Ecology from the University of Stellenbosch (Nature Conservation III & IV as extra subjects). Since qualifying with his degree, he had worked for more than 20 years in the environmental management field, first at the Overberg Test Range (a Division of Denel) managing the environmental department of OTB and being responsible for developing and implementing an ISO14001 environmental management system, ensuring environmental compliance, performing environmental risk assessments with regards to missile tests and planning the management of the 26 000 ha of natural veld, working closely with CapeNature (De Hoop Nature Reserve). In 2005 he joined Enviroscientific, an independent environmental consultancy specializing in wastewater management, botanical and biodiversity assessments, developing environmental management plans and strategies, environmental control work as well as doing environmental compliance audits and was also responsible for helping develop the biodiversity part of the Farming for the Future audit system implemented by Woolworths. During his time with Enviroscientific he performed more than 400 biodiversity and environmental legal compliance audits. During 2010 he joined EnviroAfrica in order to move back to the biodiversity aspects of environmental management. Experience with EnviroAfrica includes EIA applications, biodiversity assessment, botanical assessment, environmental compliance audits and environmental control work.

Mr. Botes is also a registered Professional Botanical, Environmental and Ecological Scientists at SACNASP (South African Council for Natural Scientific Professions) as required in terms of Section 18(1)(a) of the Natural Scientific Professions Act, 2003, since 2005.

Yours sincerely,



P.J.J. Botes (Pr.Sci.Nat: 400184/05)

Registered Professional Environmental and Ecological Scientist

TABLE OF CONTENTS

1.		INT	rodu	JCTION	1
	1.1		Status	of the original report	1
2.		ME	THOD	S USED	2
	2.1		Site vi	sit	2
3.		ΑP	PLICA	BLE LEGISLATION (UPDATED)	3
				ONS & ABBREVIATIONS	
4.				tions	
	4.1			viations	
5.				TION (UPDATED)	
	5.1			tial impacts on Centres of Endemism	
	5.2			encountered (updated)	
	5.3			tened and protected plant Species	
		5.3		Red list of South African species	
		5.3	.2	NEM: BA Protected species	
		5.3	.3	NFA Protected species	
		5.3		NCNCA protected species	
	5.4			Il biodiversity areas	
		5.4		Biodiversity categories for land-use planning Error! Bookmark not defin	
		5.4	-	Potential Critical biodiversity areas encountered	
	5.5			ve alien Plants	
		5.5	.1	Fertilizer, farm feeds, agricultural remedies and stock remedies act	
		5.5	.2	Conservation of agricultural resources act	
		5.5	.3	National environmental management: biodiversity act	
		5.5	.4	Northern cape nature conservation act Error! Bookmark not defin	
		5.5		Alien and invasive plants encountered	
	5.6	5	Veld f	ire risk	18
6.		IM	PACT	ASSESSMENT METHOD	.19
	6.1	l	Deter	mining significance	19
		6.1	.1	Criteria used	19
	6.2	2	Signifi	cance categories	20
7.		BIC	DIVE	RSITY ASSESSMENT	.22
	7.1	l	Bioph	ysical environment	22
	7.2	2		tened or protected ecosystems	
	7.3			nulative impacts	
	7.4	ļ.		t evaluation	
8.		RE	COMM	/ENDATIONS	.22
9.		IM	PACT	MINIMIZATION	.29
10	١.		REFE	RENCES	.30

LIST OF FIGURES

Figure 1: Google image showing the area covered as part of the follow-up site visit (March 2017)	2
Figure 2: South African red list categories (SANBI, 2015)	.11
Figure 3: South African National Veldfire Risk Classification (March 2010)	.18
Figure 4: Indicating potential renewable energy sites within 30km radius of the proposed Vanrhynsdorp Solar site	.24
Figure 5: The vegetation map of South Africa (2012, beta version) showing the vegetation associated with the RE sites within 30km	.24
LIST OF TABLES	
Table 1: List of flora encountered on the property	9
Table 2: Definitions of the South African national red list categories (SANBI, 2015)	
Table 3: NFA protected species encountered within the footprint and immediate surroundings Error! Bookmark not defin-	
Table 4: Plant species protected in terms of the NCNCA encountered within the study areaError! Bookmark not define	ed.
Table 6: List of alien and invasive species encountered within the larger footprint	.17
Table 6: Categories used for evaluating conservation status	.19
Table 7: Categories used for evaluating likelihood	.19
Table 8: Categories used for evaluating duration	.20
Table 9: Categories used for evaluating extent	.20
Table 10: Categories used for evaluating severity	.20
Table 11: Categories used to describe significance rating (adjusted from DEAT, 2002)	.21
Table 12: Significant rating of impacts associated with the proposed development (including the No-Go option)	.26
LIST OF PHOTOS	
Photo 1: Typical sparse semi-desert vegetation encountered on site (Roepera species prominent)	6
Photo 2: Sparse shrubland with a denser patch of vegetation in background (along a watercourse)	
· · · · · · · · · · · · · · · · · · ·	

1. INTRODUCTION

Roma Energy Holdings is proposing the establishment of a solar energy facility on the remainder of Farm Duinen No. 258, Vanrhynsdorp (Western Cape Province, Matzikama Local Municipality). Please note, that approximately 20 ha of the property was evaluated (Red area in Figure 1), but the actual footprint will only be about half of the 20 ha (approximately 10 ha, Refer to the Blue area in Figure 1). There is thus ample room for micro-adjustment of the infrastructure to minimise potential impact on any significant environmental feature encountered. The purpose of the proposed facility is to supply electricity to Eskom as part of the Renewable Energy Independent Power Producers Procurement Programme.

During 2012, PB Consult was appointed by EnviroAfrica to assessed and reported on the potential biodiversity impacts of this project on the proposed footprint (Refer to the revised Biodiversity Assessment & Botanical Scan report dated 13 April 2012) as part an environmental impact assessment application to the Department of Environmental Affairs (in terms of the NEMA EIA Regulations). Environmental authorisation (EA) was granted by the Department of Environmental Affairs (DEA) for the above application but the EA expired before physical work on the site could commence. To continue with the development, reapplication is required.

PB Consult was instructed to re-visit the site and re-evaluate the original biodiversity report in order to determine if the findings of the original report (PB Consult, 2012) is still applicable. The terms of reference and the physical footprint remains the same.

1.1 STATUS OF THE ORIGINAL REPORT

In terms of the above a further site visit was performed on the 2nd of June 2017, during which the author reevaluated the site. The additional site visit did not reveal any new biodiversity features that were not evaluated during the original study. The site visit and updated desk studies did not resulted in any significant additional impacts being identified by the author, which was not considered in the original report. The site is still described as an arid landscape supporting a *Salsola* dominated low open shrubland with a sparse vegetation cover. There are no watercourses or wetlands on or nearby the site. The nearest watercourse is the Droë River, approximately 850m north-north-west of the proposed site.

The author would like to confirm that the original report still stands, but must be read in conjunction with this addendum, which includes the following:

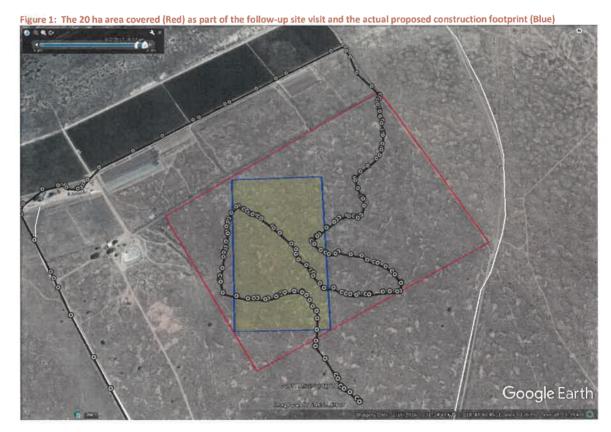
- Updated legal requirements register;
- Potential impacts on centres of Endemism of South Africa;
- Updated plant species lists,
- Updated impact evaluation on endangered or protected plant species;
- Updated impact assessment to include cumulative impacts (based on the latest available information).
- Updated recommendations.

2. METHODS USED

The objective of this study was to re-evaluate the biological diversity associated with the study area in order to identify significant environmental features which should be avoided during development activities and to reevaluate short and long term impact and possible mitigation actions in context of the proposed development.

2.1 SITE VISIT

The original site visit was done during January 2012. The follow-up site visit was done on the 2nd of June 2017. The site visit compromises walking the site, examining and photographing any area of interest. During the site visit and desktop studies, a fairly good understanding of the environment was achieved. At the time of the site visit the veld still showed the effects of a severe drought period (although recent rains did fell over the area). As a result the timing of the site visit could have been better in that very few annual plants were visible. Also because of the drought, many of the plants were difficult to identify to species level. However, the author is confident that a good understanding of the biodiversity status of the site was still possible.



3. APPLICABLE LEGISLATION (UPDATED)

- Constitution of the Republic of South Africa (1996): of special relevance in terms of environment is section 24

 Conservation of Agricultural Resources Act 43 of 1983 (CARA): supports conservation of natural agricultural resources (soil, water, plant biodiversity) by maintaining the production potential of the land and combating/preventing erosion; for example, by controlling or eradicating declared weeds and invader
- Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947), to control the sell, purchase, use and disposal of agricultural or stock remedies.
- **Hazardous Substances Act 15 of 1973**: to control substances that may cause injury, ill-health, or death through their toxic, corrosive, irritant, strongly sensitizing or flammable nature, or by the generation of pressure
- National Environmental Management Act 107 of 1998 (as amended): replaces the Environmental Conservation Act (ECA) and establishes principles for decision-making on matters affecting the environment, and for matters connected therewith.
 - Environmental Impact Assessment Regulations (R543 of 2010): procedures to be followed for application to conduct a listed activity.
- National Environmental Management: Air Quality Act 39 of 2004 (NEMAQA): replaces the Atmospheric Pollution Prevention Act (No. 45 of 1965).
- National Environmental Management: Biodiversity Act 10 of 2004 (NEMBA): supports conservation of plant and animal biodiversity, including the soil and water upon which it depends.
 - National list of ecosystems that are threatened and in need of protection (GN 1002 of 9 December 2011).
 - Alien and invasive species list 2016 (GN R. 864 of 29 July 2016).
- National Environmental Management: Protected Areas Act 57 of 2003 (as amended Act 31 of 2004)

 (NEMPAA): To provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes.
- National Environmental Management: Waste Act 59 of 2008 (NEMWA): To reform the law regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development.
 - List of Waste Management Activities that have, or are likely to have a detrimental effect on the
 environment (GN 718 of 3 July 2009): Identifies activities in respect of which a waste management
 license is required.
- National Forests Act 84 of 1998 (as amended): supports sustainable forest management and the restructuring of the forestry sector.
 - List of protected tree species (as updated)

- National Heritage Resources Act 25 of 1999: supports an integrated and interactive system for the management of national heritage resources, including supports soil, water and animal and plant biodiversity.
- National Veld and Forest Fire Act 101 of 1998 (NVFFA): protects soil, water and plant life through the prevention and combating of veld, forest, and mountain fires
- **National Water Act 36 of 1998 (NWA):** promotes the protection, use, development, conservation, management, and control of water resources in a sustainable and equitable manner.

4. DEFINITIONS & ABBREVIATIONS

4.1 **DEFINITIONS**

Contaminated water: means water contaminated by the activities associated with construction, *e.g.* concrete water and runoff from plant/ personnel wash areas.

Environment: means the surroundings within which humans exist and that are made up of:

- the land, water and atmosphere of the earth;
- micro-organisms, plant and animal life;
- any part of the combination of the above two bullets and the interrelationships between them;
- the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being
- **Environmental Aspect**: any element of any construction activity, product or services that can interact with the environment.
- **Environmental Control Officer**: a suitably qualified environmental agent responsible for overseeing the environmental aspects of the Construction phase of the EMP.
- **Environmental Impact**: any change to the environment, whether adverse or beneficial, wholly or partially resulting from any construction activity, product or services.
- **No-Go Area(s):** an area of such (environmental/aesthetical) importance that no person or activity are allowed within a designated boundary surrounding this area.
- **Owner:** the owner, or dedicated person, responsible for the management of the property on which the proposed activity will be performed.
- **Solid waste**: means all solid waste, including construction debris, chemical waste, excess cement/concrete, wrapping materials, timber, tins and cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers).
- **Precautionary principle**: means the basic principle, that when in doubt or having insufficient or unreliable information on which to base a decision, to then limit activities in order to minimise any possible environmental impact.
- **Watercourse**: in this report the author uses the following, very simplified, classification system to define the difference between a river, a water course and an ephemeral drainage line.
 - <u>River</u>: A river is a natural watercourse with a riverbed wider than 3m, usually freshwater, flowing toward an ocean, a lake, a sea or another river. In a few cases, a river simply flows into the ground or dries up completely before reaching another body of water. The flow could be seasonal or permanent.
 - <u>Stream</u>: A small river or natural watercourse with a riverbed of less than 3 m, usually freshwater, flowing toward an ocean, a lake, a sea or another river. In a few cases, a river simply flows into the

- ground or dries up completely before reaching another body of water. The flow could be seasonal or permanent.
- <u>Ephemeral drainage line</u>: A very small and poorly defined watercourse, mostly on relatively flat areas, which only flows for a short period after heavy rainfall events, which usually dissipate before reaching another body of water (typically found on the flattish undulating plains of the Northern Cape).

4.2 **ABBREVIATIONS**

AIP Alien and invasive plants

AIS Alien and invasive species

BGIS Biodiversity Geographical Information System

CARA Conservation of Agricultural Resources Act 43 of 1983

CBA Critical Biodiversity Areas (Municipal)

DEA Department of Environmental Affairs

EAP Environmental Assessment Practitioner

ECO Environmental Control Officer

EIA Environmental Impact Assessment

EMF (Municipal) Environmental Management Framework

EMP Environmental management plan

GWC Griqualand West Centre of endemism

IDP Integrated development plan

IUCN International Union for Conservation of Nature

NEMA National Environmental Management Act, Act 107 of 1998

NEMAQA National Environmental Management Air Quality Act 39 of 2004

NEMBA National Environmental Management Biodiversity Act, Act 10 of 2004

NEMPAA National Environmental Management Protected Areas Act 57 of 2003

NEMWA National Environmental Management Waste Act 59 of 2008

NFA National Forests Act 84 of 1998

NSBA National Spatial Biodiversity Assessment

NVFFA National Veld and Forest Fire Act 101 of 1998

NWA National Water Act 36 of 1998

SABIF South African Biodiversity Information Facility
SANBI South African National Biodiversity Institute

SIBIS SANBI's Integrated Biodiversity Information System

SKEP Succulent Karoo Ecosystem Project

5. VEGETATION (UPDATED)

The vegetation described in the original report remains the same and still stands. The following should be read in addition to the original report. The vegetation encountered is described as Vanrhynsdorp Gannabosveld, which is part of the Succulent Karoo Biome (Mucina & Rutherford, 2006, as updated in the 2012 beta version). The Succulent Biome vegetation is strongly influenced by winter rainfall and fog and has been compared to a desert rich in succulents. According to the 2004 National Spatial Biodiversity Assessment (NSBA), approximately 79% of the Vanrhynsdorp Gannabosveld vegetation still remains, with the main reasons for the transformation of the remainder being cultivation and open-cast gypsum mining. A conservation target of 28% has been set for this vegetation type (none of which was formally conserved during 2004), but with the recent proclamation of the Knersvlakte Nature Reserve, at least some of this vegetation type should now be formally conserved. The 2004 NSBA originally classified this vegetation type as vulnerable. However, with more information now available, it was declassified to "Least Threatened" in the National list of ecosystems that are threatened and in need of protection (GN 1002, December 2011).

Photo 1: Low open succulent shrubland encountered on the site (note Prosopis trees in background)



Photo 2: Grassy components sometimes dominating open areas in between the shrubs



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The recent ongoing drought left its mark on the veld, and many plants within the study area and surroundings showed signs of being severely affected by the dry spell (Refer to Photo 1 & Photo 2), so much so that even some of the *Euphorbia* plants had died back. However, the site visit also showed signs of recent rains, and a few plants was starting to bud. The impact of the drought, however, made positive identification of some of species difficult (no flowers and sometimes also without leaves) and the author had to rely on previous identification and knowledge of the veld for identification of some species. Gannabosveld is normally not known to have a high species turnover, but even so, the number of plant species encountered was lower than expected, which is probably a result of the recent drought (leaf succulents being very susceptible to extended dry spells). Apart from the vegetation itself, no other biodiversity feature of note was observed within the study area (e.g. no streams or watercourses, "heuweltjies" – Termite mounds, or true quartz patches).

The open dwarf shrub layer was dominated by Salsola cf. zeyheri (Gannabos) and a number of succulent species, most notably Drosanthemum cf. hispidum and Mesembryanthemum species (previously Aridaria species). The following species were also encountered: Aloe claviflora (occasionally), Asparagus cf. capensis, Euphorbia spinea, Galenia africana, Mesembryanthemum barkly and M. guerichianum. Grasses were mostly sparsely distributed, but sometimes covered extended areas. The most noteworthy being Bromus pectinatus, the spiny Cladoraphis spinosa and Stipa capensis. A number of the alien Prosopis trees and some Atriplex cf. lindleyi (Klappiesbrak) were also observed.

Species like *Galenia africana*, many of the Aizoaceae and *Atriplex* cf. *lindleyi* are normally ploneer species and also indicators of disturbance. Together with the observations of *Bromus pectinatus* and *Stipa capensis* it is very likely that the veld has been subjected to constant grazing (even possibly overgrazing) over a long period of time by domestic stock (which is more specialized in their grazing habits and tends to have a more severe impact on the veld).

Please note that the original document did not list plant species within its own table (which has been added in this document, Please refer to Table 1). In addition the South African National Biodiversity Institute's biodiversity website added the function of being able to download plant species checklists per vegetation type. This checklist was also added as Appendix 1.

Biodiversity Assessment Addendum

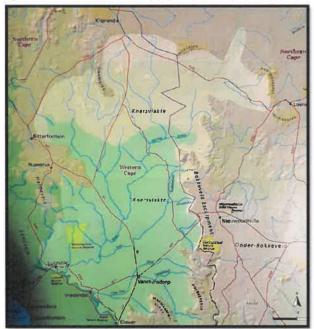
Vanrhynsdorp

Page 7

5.1 KNERSVLAKTE CENTRE OF ENDEMISM

The Knersvlakte is known for its characteristic white quartzite gravel that can conceal a myriad of succulent species (many of them rare dwarf plants). Of the 1 500 plant species in the Knersvlakte, about 190 species are endemic to the region, while approximately 155 of are threatened with extinction, as they succumb easily to climatic

Figure 2: The Knersvlakte Centre of endemism (highlighted) taken from Van Wyk & Smith (200:



vital-biodiversity-hotspot). The Knersvlakte Centre (KVC) of endemism is named after the Knersvlakte north of Vanrhynsdorp. There are various explanations for origin of its name. One of the common views is that it originates from the crunching noise made by the wagon wheels of old when driving over the extensive fields of hard quartz pebbles commonly found in the area north of Vanrhynsdorp. The KVC is demarcated by Van Wyk & Smith (2001) as the extensive plain bounded in the south by the Olifants River, in the east by the Bokkeveld Escarpment and in the west by the Sandveld and granite hills of the Spektakel and Little Namaqualand Suite (the Hardeveld), and in the north by the Namaqualand Rocky Hills (near Bitterfontein). It is encountered on an area of mostly level plains and rolling, generally low relief hills. Topographically it is one of the most featureless of all the centres of endemism's in South Africa. The climate is mild, with light frost in winter. Offshore bergwind conditions can result in high temperatures and very arid conditions, even in winter. Rainfall occurs mainly in winter, while the prevailing onshore winds from the Atlantic Ocean produce occasional fog (providing additional precipitation for the plants). The geology is complex, but the KVC corresponds roughly with the various litho-stratigraphic units of the Vanrhynsdorp Group. Soils are usually clayey, alkaline and saline in places and can play an important role in the distribution of plant species. The extensive fields of small white quartz pebbles encountered to the north of Vanrhynsdorp is one of the most conspicuous features of this landscape. The vegetation is typically low and dominated by

conditions and changes (www.capenature.co.za/knersvlakte-nature-reserve-proclaimed-

succulents, with grasses more prominent in sandy areas. Trees are almost absent and are only encountered along watercourses and its tributaries. Pebble strewn areas can appear almost without vegetation, but in reality they support a multitude of almost subterranean dwarf succulents. The KVC is especially rich in dwarf succulents, most of which is associated with the quartz pebble fields and rocky areas, while the sandy plains have a less specialised flora (Van Wyk en Smith, 2001). The KVC is mostly considered the <u>centre of diversity of the quartz-field flora of Southern Africa</u> and is clearly linked to the other centres of high endemism in the Succulent Karoo region, notably the Gariep Centre and to a lesser degree the Little Karoo. The flora of the KVC is threatened mainly by selective overgrazing and trampling by sheep, especially during periods of drought.

According to Van Wyk & Smith (2001) Vanrhynsdorp, and its immediate surroundings, falls within the Knersvlakte Centre of Endemism, meaning that the proposed development will also fall within larger demarcation of the KVC. However, the proposed development is located on the sandy soils to the south of the true quarts-field flora and although it is likely that the veld will support a number of annual and geophyte flora (which can result in spectacular flower displays in spring after good rains), it is unlikely that the proposed development (given its relative small size and location) will result in any significant impact on the true Knersvlakte vegetation.

5.2 FLORA ENCOUNTERED (UPDATED)

Please note that this study never intended to be full botanical assessment. However, a scan of significant species was done during the site visit, and even though the author does not claim that all species encountered were identified, all efforts were made to do just that. Table 1 gives an updated list of the species encountered within the study area (for both site visits) as well as their status and further actions needed where applicable.

Table 1: List of flora encountered on the property

No.	Species name	FAMILY	Status Red list, NFA	Alien & invader species (AIS)	Legal requirements
1.	Aloe claviflora	ASPHODELACEAE			
2.	Asparagus cf. capensis	ASPARAGACEAE			
3.	Atriplex cf. lindleyi	AMARANTHACEAE		CARA, Cat 3 invader, NEMBA, Cat. 1b invader	Implement an alien eradication program
4.	Bromus pectinatus	POACEAE			
5.	Cladoraphis spinosa	POACEAE			
6.	Drosanthemum cf. hispidum	AIZOACEAE			

Biodiversity Assessment Addendum

Vanrhynsdorp

Page 9

No.	Species name	FAMILY	Status Red list, NFA	Alien & invader species (AIS)	Legal requirements
7.	Euphorbia spinea	EUPHORBIACEAE			
8.	Galenia africana	AIZOACEAE			
9.	Mesembryanthemum barkly	AIZOACEAE			
10.	Mesembryanthemum guerichlanum	AIZOACEAE			
11.	Mesembryanthemum species (previously Aridaria species).	AIZOACEAE			
12.	Prosopis species	FABACEAE		CARA, Cat 2 invader, NEMBA, Cat. 1b invader	Implement an alien eradication program
13.	Salsola cf. zeyheri	AMARANTHACEAE			
14.	Stipa capensis	POACEAE			

5.3 THREATENED AND PROTECTED PLANT SPECIES

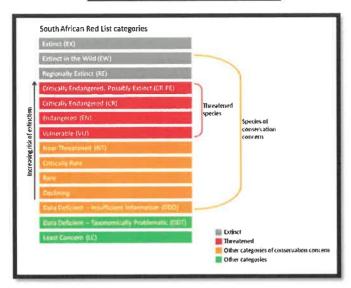
South Africa has become the first country to fully assess the status of its entire flora. Major threats to the South African flora are identified in terms of the number of plant taxa Red-Listed as threatened with extinction as a result of habitat loss, invasive alien plant infestation, habitat degradation, unsustainable harvesting, demographic factors, pollution, loss of pollinators or dispersers, climate change and natural disasters (e.g. such as droughts and floods). South Africa uses the internationally endorsed IUCN Red List Categories and Criteria in the Red List of South African plants. However, due to its strong focus on determining risk of extinction, the IUCN system does not highlight species that are at low risk of extinction, but may nonetheless be of high conservation importance. As a result a SANBI uses an amended system of categories in order to highlight species that may be of low risk of extinction but are still of conservation concern (SANBI, 2015).

In the Western Cape, species of conservation concern are also protected in terms of national and provincial legislation, namely:

- The National Environmental Management: Biodiversity Act, Act 10 of 2004, provides for the protection of species through the "Lists of critically endangered, endangered, vulnerable and protected species" (GN. R. 152 of 23 February 2007).
- National Forest Act, Act 84 of 1998, provides for the protection of forests as well as specific tree species through the "List of protected tree species" (GN 908 of 21 November 2014).

Biodiversity Assessment Addendum

5.3.1 RED LIST OF SOUTH AFRICAN SPECIES



The Red List of South African Plants online provides up to date information on the national conservation status of South Africa's indigenous plants (SANBI, 2015). The South African red list categories are given in Figure 3.

Figure 3: South African red list categories (SANBI, 2015)

5.3.1.1 Definitions of the national Red List categories

Categories marked with ^N are non-IUCN, national Red List categories for species not in danger of extinction, but considered of conservation concern (Refer to Table 2). The IUCN equivalent of these categories is Least Concern (LC) (SANBI, 2015).

Table 2: Definitions of the South African national red list categories (SANBI, 2015)

Extinct (EX): A species is Extinct when there is no reasonable doubt that the last individual has died. Species should be classified as Extinct only once exhaustive surveys throughout the species' known range have failed to record an individual.

Extinct in the Wild (EW): A species is Extinct in the Wild when it is known to survive only in cultivation or as a naturalized population (or populations) well outside the past range.

Regionally Extinct (RE): A species is Regionally Extinct when it is extinct within the region assessed (in this case South Africa), but wild populations can still be found in areas outside the region.

Critically Endangered, Possibly Extinct (CR PE): Possibly Extinct is a special tag associated with the category Critically Endangered, indicating species that are highly likely to be extinct, but the exhaustive surveys required for classifying the species as Extinct has not yet been completed. A small chance remains that such species may still be rediscovered.

Critically Endangered (CR): A species is Critically Endangered when the best available evidence indicates that it meets at least one of the five IUCN criteria for Critically Endangered, indicating that the species is facing an extremely high risk of extinction.

Endangered (EN): A species is Endangered when the best available evidence indicates that it meets at least one of the five IUCN criteria for Endangered, indicating that the species is facing a very high risk of extinction.

Vulnerable (VU): A species is Vulnerable when the best available evidence indicates that it meets at least one of the five IUCN criteria for Vulnerable, indicating that the species is facing a high risk of extinction.

Near Threatened (NT): A species is Near Threatened when available evidence indicates that it nearly meets any of the IUCN criteria for Vulnerable, and is therefore likely to become at risk of extinction in the near future.

Critically Rare A species is Critically Rare when it is known to occur at a single site, but is not exposed to any direct or plausible potential threat and does not otherwise qualify for a category of threat according to one of the five IUCN criteria.

Nare: A species is Rare when it meets at least one of four South African criteria for rarity, but is not exposed to any direct or plausible potential threat and does not qualify for a category of threat according to one of the five IUCN criteria. The four criteria are as follows:

- Restricted range: Extent of Occurrence (EOO) <500 km2, OR</p>
- ➤ Habitat specialist: Species is restricted to a specialized microhabitat so that it has a very small Area of Occupancy (AOO), typically smaller than 20 km2, OR
- Low densities of individuals: Species always occurs as single individuals or very small subpopulations (typically fewer than 50 mature individuals) scattered over a wide area, OR
- Small global population: Less than 10 000 mature individuals.

^NDeclining: A species is Declining when it does not meet or nearly meet any of the five IUCN criteria and does not qualify for Critically Endangered, Endangered, Vulnerable or Near Threatened, but there are threatening processes causing a continuing decline of the species.

Least Concern (LC): A species is Least Concern when it has been evaluated against the IUCN criteria and does not qualify for any of the above categories. Species classified as Least Concern are considered at low risk of extinction. Widespread and abundant species are typically classified in this category.

Data Deficient - Insufficient Information (DDD): A species is DDD when there is inadequate information to make an assessment of its risk of extinction, but the species is well defined. Listing of species in this category indicates that more information is required and that future research could show that a threatened classification is appropriate.

Data Deficient - Taxonomically Problematic (DDT): A species is DDT when taxonomic problems hinder the distribution range and habitat from being well defined, so that an assessment of risk of extinction is not possible.

Not Evaluated (NE): A species is Not Evaluated when it has not been evaluated against the criteria. The national Red List of South African plants is a comprehensive assessment of all South African indigenous plants, and therefore all species are assessed and given a national Red List status. However, some species included in Plants of southern Africa: an online checklist are species that do not qualify for national listing because they are naturalized exotics, hybrids (natural or cultivated), or synonyms. These species are given the status Not Evaluated and the reasons why they have not been assessed are included in the assessment justification.

5.3.1.2 Red listed plant species associated with this veld type

According to the Red List of South African Plants (version 2017.1., www.redlist.sanbi.org, accessed on 2017/06/30) a number of listed plant species is associated with Vanrhynsdorp Gannabosveld namely:

- Agathosma elata Sond. EN
- Aspalathus cuspidata R.Dahlgren VU
- Aspalathus obtusata Thunb. VU
- Babiana salteri G.J.Lewis VU
- Babiana toximontana J.C.Manning & Goldblatt EN
- Bulbine melanovaginata G.Will. VU
- Cephalophyllum pulchrum L.Bolus VU
- Eriospermum attenuatum P.L.Perry DDD
- Eriospermum eriophorum P.L.Perry CR
- Eriospermum spirale Schult. VU
- Euphorbia fasciculata Thunb. VU
- Euphorbia pedemontana L.C.Leach VU
- Euphorbia schoenlandii Pax VU
- Haemanthus lanceifolius Jacq. VU
- Heliophila leptophylla Schltr. VU
- Lachenalia minima W.F.Barker VU
- Morgeg guartzicola Goldblatt & J.C.Manning VU
- Ornithoaalum hallii Oberm. EN
- Oxalis blastorrhiza T.M.Salter EN
- Oxalis dines Ornduff VU
- Phyllobolus tenuiflorus (Jacq.) Gerbaulet VU
- Quagua pulchra (Bruyns) Plowes EN
- Romulea multisulcata M.P.de Vos VU
- Steirodiscus linearilobus DC. CR
- Tylecodon suffultus Bruyns ex Toelken Critically Rare

No red list plant species was encountered on the proposed site.

5.3.2 NEM: BA PROTECTED SPECIES

The National Environmental Management: Biodiversity Act, Act 10 of 2004, provides for the protection of species through the "Lists of critically endangered, endangered, vulnerable and protected species" (GN. R. 152 of 23 February 2007).

No species protected in terms of NEM: BA was encountered.

5.3.3 NFA PROTECTED SPECIES

The National Forests Act (NFA) of 1998 (Act 84 of 1998) provides for the protection of forests as well as specific tree species their List of Protected tree species, updated on a yearly basis. The latest list on which this evaluation is based was published on the 23rd of December 2016 (GN 1602). One species protected in terms of the NFA was observed (refer to **Error! Reference source not found.**).

No species protected in terms of NFA was encountered.

5.4 CRITICAL BIODIVERSITY AREAS

Critical biodiversity areas (CBA's) are terrestrial and aquatic features in the landscape that are critical for retaining biodiversity and supporting continued ecosystem functioning and services (SANBI 2007). The primary purpose of CBA's is to inform land-use planning in order to promote sustainable development and protection of important natural habitat and landscapes. CBA's can also be used to inform protected area expansion and development plans. The CBA's underneath is based on the definition laid out in the guideline for publishing bioregional plans (Anon, 2008):

- <u>Critical biodiversity areas (CBA's)</u> are areas of the landscape that need to be maintained in a natural
 or near-natural state in order to ensure the continued existence and functioning of species and
 ecosystems and the delivery of ecosystem services. In other words, if these areas are not maintained
 in a natural or near-natural state then biodiversity conservation targets cannot be met. Maintaining
 an area in a natural state can include a variety of biodiversity-compatible land uses and resource uses.
- Ecological support areas (ESA's) are areas that are not essential for meeting biodiversity representation targets/thresholds but which nevertheless play an important role in supporting the ecological functioning of critical biodiversity areas and/or in delivering ecosystem services that support socio-economic development, such as water provision, flood mitigation or carbon sequestration. The degree of restriction on land use and resource use in these areas may be lower than that recommended for critical biodiversity areas.

From a land-use planning perspective it is useful to think of the difference between CBA's and ESA's in terms of where in the landscape the biodiversity impact of any land-use activity action is most significant:

- For CBA's the impact on biodiversity of a change in land-use that results in a change from the desired
 ecological state is most significant locally at the point of impact through the direct loss of a
 biodiversity feature (e.g. loss of a populations or habitat).
- For ESA's a change from the desired ecological state is most significant elsewhere in the landscape
 through the indirect loss of biodiversity due to a breakdown, interruption or loss of an ecological
 process pathway (e.g. removing a corridor results in a population going extinct elsewhere or a new
 plantation locally results in a reduction in stream flow at the exit to the catchment which affects
 downstream biodiversity).

5.4.1 CRITICAL BIODIVERSITY AREAS ENCOUNTERED

Vanrhynsdorp and the proposed site location fall within the Western Cape Biodiversity Spatial Plan (WCBSP). The WCBSP aims at the most efficient selection of planning units required to meet all biodiversity, ecological sustainability and climate resilience targets, while favouring persistence and avoiding areas of competing landuses.

According to the WCBSP (Refer to Figure 4) the proposed site will be located within an ecological support area (ESA 1), identified as a water recharge area. The larger area is not essential for meeting biodiversity targets, but can play an important role in supporting the functioning of protected areas or critical biodiversity area. The objective for CBA 1 areas is to maintain these areas in a functional near natural state. Some habitat loss may be acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.

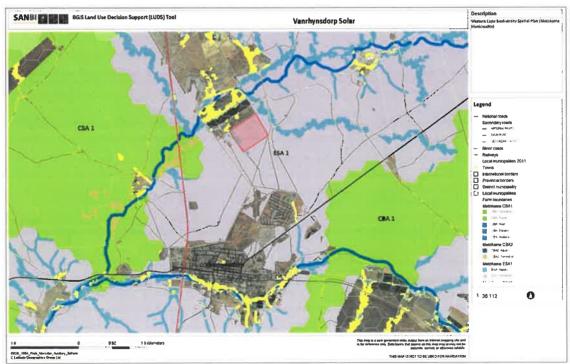


Figure 4: Western Cape Biodiversity spatial plan showing the proposed site (red) within an ESA 1 area

In terms of its status it is important to note the following:

- The site is still covered by natural veld dominated by Gannabos. Although it is difficult to ascertain, it
 is likely that the veld has been impacted by domestic livestock grazing (a possible reason for the low
 species diversity apart from the recent drought);
- The proposed development will be relative small (± 10ha) and is located adjacent to existing agricultural land.
- The site still has good connectivity to the south, east and northeast, but borders on intensive cultivation to the northwest.
- The site fall within the larger Knersvlakte Centre of Endemism;
- Vanrhynsdorp Gannabosveld is classified as "Least Threatened" with approximately 79% remaining.
 However, it is unsure whether the conservation target of 28% had been reached with the recent declaration of the Knersvlakte Nature Reserve;
- No protected or red-listed plants were observed, but observations are based on a two day site visit
 which did not co-inside with the main annual and geophyte flowering time.

5.5 INVASIVE ALIEN PLANTS

Alien and invasive plant (AIP) species were introduced into South Africa more than 1 000 years ago *via* trading routes from other countries in southern Africa (Alberts & Moolman, 2013). Since the arrival of settlers from Europe these numbers have increased dramatically. At present, AIPs are encountered on large portions of land in South Africa (10 million hectares) and it is reportedly consuming nearly 330 million cubic meters of water annually, or 7% of the annual run-off. But what is really scary is that this water consumption levels are increasing rapidly and could reach 50% of the mean annual run-off in the not too distant future (Alberts & Moolman, 2013). The aggressive behaviour of the AIPs in their unnatural habitat is a direct threat to the vast wealth of biodiversity in South Africa. South Africa is a relatively small country that comprises only 2% of the total surface of the Earth, but it contains 10% of the plant species, 7% of the vertebrates, and is home to a number of biodiversity hotspots.

In South Africa, there are currently three pieces of national legislation that relate to the control of Alien and Invasive Species (AIS) namely the:

- Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947),
 administered by the Department of Agriculture, forestry and Fisheries.
- List of weeds and invader plants declared in terms of Regulations 15 and 16 (as Amended, March 2001) of the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) (CARA) administered by the Department of Agriculture, Forestry and Fisheries (DAFF);
- Alien and invasive species list 2016 (GN R. 864 of 29 July 2016) promulgated in terms of sections 66(1), 67(1), 70(1)(a), 71(3) and 71A of the National Environmental Management, Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA), administered by the Department of Environmental Affairs (DEA).

5.5.1 FERTILIZER, FARM FEEDS, AGRICULTURAL REMEDIES AND STOCK REMEDIES ACT

According to Government Notice No. 13424 dated 26 July 1992, it is an offence to "acquire, dispose, sell or use an agricultural or stock remedy for a purpose or in a manner other than that specified on the label on a container thereof or on such a container".

Contractors using herbicides need to have a valid Pest Control Operators License (limited weeds controller) according to the Fertilizer, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act No. 36 of 1947).

5.5.2 CONSERVATION OF AGRICULTURAL RESOURCES ACT

The CARA sets out the regulations (amended March 2001) regarding the control of weeds and invasive plants and provides a list of declared plants. The amended regulations make provision for four groups of invader plants. The first three groups consist of undesirable alien plants and are covered by Regulation 15, namely:

- Category 1 declared weeds (Section 15A of the amended act) are prohibited plants that will no longer
 be tolerated on land or on water surfaces, neither in rural or urban areas. These plants may no longer
 be planted or propagated, and all trade in their seeds, cuttings or other propagative material is
 prohibited. Plants included in this category because their harmfulness outweighs any useful
 properties or purpose they may have.
- Category 2 declared plant invaders (Section 15B of the amended act) are plants with a proven potential of becoming invasive, but which nevertheless have certain beneficial properties that warrant their continued presence in certain circumstances. May be grown in demarcated areas provided that there is a permit and that steps are taken to prevent their spread.
- Category 3 declared plant invaders (Section 15C of the amended act) are undesirable because they have the proven potential of becoming invasive, but most of them are nevertheless popular ornamentals or shade trees that will take a long time to replace. May no longer be planted. Existing plants may be retained as long as all reasonable steps are taken to prevent the spreading thereof, provided they are not within 30 metres of the 1:50 year flood line of a river, stream, lake or other type of inland water body. The "executive officer" can impose further conditions on Category 3 plants already in existence, which might include removing them if the situation demands it.
- **Bush encroachers**, which are indigenous plants that require sound management practices to prevent them from becoming problematic, are covered separately by Regulation 16.

Refer to heading 5.5.4 for listed weeds and invader species encountered in terms of CARA.

5.5.3 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT

NEMBA aims to provide the framework, norms, and standards for the conservation, sustainable use, and equitable benefit-sharing of South Africa's biological resources. The purpose of NEMBA as it relates to Alien and Invasive Species (AIS) is to prevent the unauthorised introduction and spread of such species to ecosystems and habitats where they do not naturally occur; manage and control such species to prevent or minimise harm to the environment and to biodiversity in particular; and to eradicate alien invasive species from ecosystems and habitats where they may harm such ecosystems or habitats. The Regulations on Alien and Invasive Species, referred to as the "AIS Regulations" combine invasive species already listed in the CARA, with two new lists relating to invasive species and prohibited species.

The AIS Regulations list 4 different categories of invasive species that must be managed, controlled or eradicated from areas where they may cause harm to the environment, or that are prohibited to be brought into South Africa, namely:

- Category 1a: invasive species that may not be owned, imported into South Africa, grown, moved, sold, given as a gift or dumped in a waterway. These species need to be controlled on your property, and officials from the Department of Environmental Affairs must be allowed access to monitor or assist with control.
- Category 1b: invasive species that may not be owned, imported into South Africa, grown, moved, sold, given as a gift or dumped in a waterway. Category 1b species are major invaders that may need government assistance to remove. All Category 1b species must be contained, and in many cases they already fall under a government sponsored management programme.
- Category 2: These are invasive species that can remain in your garden, but only with a permit, which is granted under very few circumstances.
- Category 3: These are invasive species that can remain in your garden. However, you cannot propagate or sell these species and must control them in your garden. In riparian zones or wetlands all Category 3 plants become Category 1b plants.

Refer to heading 5.5.4 for listed alien and invasive species encountered in terms of NEM: BA.

5.5.4 ALIEN AND INVASIVE PLANTS ENCOUNTERED

Approximately 10 *Prosopis* trees were observed on the property, but no alien plant species was observed within the proposed footprint area (Refer to Table 3).

Table 3: List of alien and invasive species encountered within the larger footprint

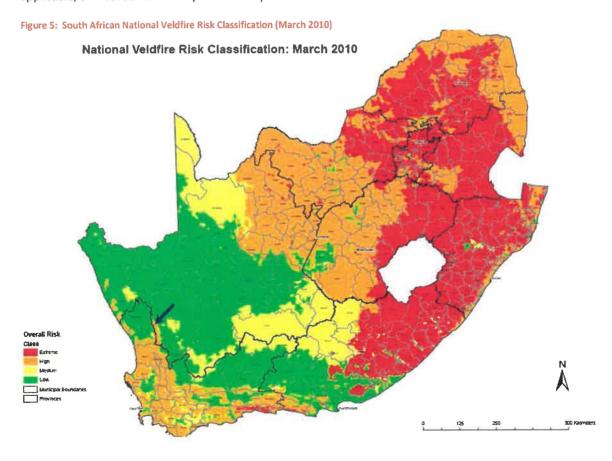
SPECIES	CARA	NEM: BA	MANAGEMENT RECOMMENDATIONS
Atriplex cf. lindleyi	Category 3 invader	Category 1b AIP	Remove all plants physically and burn
Prosopis glandulosa	Category 2 invader	Category 1B AIP (Western Cape)	Remove all plants physically (including root system) and burn, or use Registered herbicide to on cut-stump as treatment. Leave-spray smaller plants with registered herbicide.

There are various means of managing alien and invasive plant species, which can include mechanical-, chemical- and biological control methods or a combination of these. Control methods prescribed by the author are usually based on used by the Working for Water Programme (Bold, 2007) and or the CapeNature alien control guideline (Martens et. al., 2003).

5.6 VELD FIRE RISK

The revised veldfire risk classification (Forsyth, 2010) in terms of the National Veld and Forest Fire Act 101 of 1998 was promulgated in March 2010. The purpose of the revised fire risk classification is to serve as a national framework for implementing the National Veld and Forest Fire Act, and to provide a basis for setting priorities for veldfire management interventions such as the promotion of and support to Fire Protection Associations. In the fire-ecology types and municipalities with High to Extreme fire risk, comprehensive risk management strategies are needed.

The proposed site is located in an area supporting a very sparse semi-desert low shrubland which has been classified with a High fire risk classification (Refer to Figure 5). Still it is important that during construction and operation the site must adhere to all the requirements of the local Fire Protection Association (FPA), if applicable, or must adhere to responsible fire prevention and control measures.



6. IMPACT ASSESSMENT METHOD

The concept of environmental impact assessment in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment (EIA) was developed to identify and evaluate the nature of potential impact in order to determine whether an activity is likely to cause significant environmental impact on the environment. The concept of significance is at the core of impact identification, evaluation and decision making, but despite this the concept of significance and the method used for determining significance remains largely undefined and open to interpretation (DEAT, 2002).

6.1 DETERMINING SIGNIFICANCE

Determining impact significance from predictions of the nature of the impact has been a source of debate and will remain a source of debate. The author used a combination of scaling and weighting methods to determine significance based on a simple formula. The formula used is based on the method proposed by Edwards (2011). However, the criteria used were adjusted to suite its use for botanical assessment. In this document significance rating was evaluated using the following criteria.

Significance = Conservation Value x (Likelihood + Duration + Extent + Severity) (Edwards 2011)

6.1.1 CRITERIA USED

<u>Conservation value</u>: Conservation value refers to the intrinsic value of an attribute (e.g. an ecosystem, a vegetation type, a natural feature or a species) or its relative importance towards the conservation of an ecosystem or species or even natural aesthetics. Conservation status is based on habitat function, its vulnerability to loss and fragmentation or its value in terms of the protection of habitat or species (Refer to Table 4 for categories used).

Table 4: Categories used for evaluating conservation status

	CONSERVATION VALUE
Low (1)	The attribute is transformed, degraded not sensitive (e.g. Least threatened), with unlikely possibility of species loss.
Medium/low (2)	The attribute is in good condition but not sensitive (e.g. Least threatened), with unlikely possibility of species loss.
Medium (3)	The attribute is in good condition, considered vulnerable (threatened), or falls within an ecological support area or a critical biodiversity area, but with unlikely possibility of species loss.
Medium/high (4)	The attribute is considered endangered or, falls within an ecological support area or a critical biodiversity area, or provides core habitat for endemic or rare & endangered species.
High (5)	The attribute is considered critically endangered or is part of a proclaimed provincial or national protected area.

<u>Likelihood</u> refers to the probability of the specific impact occurring as a result of the proposed activity (Refer to Table 5, for categories used).

Table 5: Categories used for evaluating likelihood

	LIKELHOOD
Highly Unlikely (1)	Under normal circumstances it is almost certain that the impact will not occur.
Unlikely (2)	The possibility of the impact occurring is very low, but there is a small likelihood under normal circumstances.
Possible (3) The likelihood of the impact occurring, under normal circumstances is 50/50, it may or it may not occurring.	
Probable (4) It is very likely that the impact will occur under normal circumstances.	
Certain (5) The proposed activity is of such a nature that it is certain that the impact will occur under normal circumst	

<u>Duration</u> refers to the length in time during which the activity is expected to impact on the environment (Refer to Table 6).

Table 6: Categories used for evaluating duration

DURATION		
Short (1)	Impact is temporary and easily reversible through natural process or with mitigation. Rehabilitation time is expected to be short (1-2 years).	
Medium/short (2)	Impact is temporary and reversible through natural process or with mitigation. Rehabilitation time is expected to be relative short (2-5 years).	
Medium (3)	Impact is medium-term and reversible with mitigation, but will last for some time after construction and may require ongoing mitigation. Rehabilitation time is expected to be longer (5-15 years).	
Long (4)	Impact is long-term and reversible but only with long term mitigation. It will last for a long time after construction and is likely to require ongoing mitigation. Rehabilitation time is expected to be longer (15-50 years).	
Permanent (5)	The impact is expected to be permanent.	

Extent refers to the spatial area that is likely to be impacted or over which the impact will have influence, should it occur (Refer to Table 7).

Table 7: Categories used for evaluating extent

	EXTENT
Site (1)	Under normal circumstances the impact will be contained within the construction footprint.
Property (2)	Under normal circumstances the impact might extent outside of the construction site (e.g. within a 2 km radius), but will not affect surrounding properties.
Surrounding properties (3)	Under normal circumstances the impact might extent outside of the property boundaries and will affect surrounding land owners or –users, but still within the local area (e.g. within a 50 km radius).
Regional (4)	Under normal circumstances the impact might extent to the surrounding region (e.g. within a 200 km radius), and will regional land owners or –users.
Provincial (5)	Under normal circumstances the effects of the impact might extent to a large geographical area (>200 km radius).

<u>Severity</u> refers to the direct physical or biophysical impact of the activity on the surrounding environment should it occur (Refer to Table 8).

Table 8: Categories used for evaluating severity

	SEVERITY
Low (1)	It is expected that the impact will have little or no affect (barely perceptible) on the integrity of the surrounding environment. Rehabilitation not needed or easily achieved.
Medium/low (2)	It is expected that the impact will have a perceptible impact on the surrounding environment, but it will maintain its function, even if slightly modified (overall integrity not compromised). Rehabilitation easily achieved.
Medium (3)	It is expected that he impact will have an impact on the surrounding environment, but it will maintain its function, even if moderately modified (overall integrity not compromised). Rehabilitation easily achieved.
Medium/high (4)	It is expected that the impact will have a severe impact on the surrounding environment. Functioning may be severely impaired and may temporarily cease. Rehabilitation will be needed to restore system integrity.
High (5)	It is expected that the impact will have a very severe to permanent impact on the surrounding environment. Functioning irreversibly impaired. Rehabilitation often impossible or unfeasible due to cost.

6.2 **SIGNIFICANCE CATEGORIES**

The formal NEMA EIA application process was developed to assess the significance of impacts on the surrounding environment (including socio-economic factors), associated with any specific development proposal in order to allow the competent authority to make informed decisions. Specialist studies must advise the environmental assessment practitioner (EAP) on the significance of impacts in his field of specialty. In order to do this, the specialist must identify all potentially significant environmental impacts, predict the nature of the impact and evaluate the significance of that impact should it occur.

Potential significant impacts are evaluated, using the method described above, in order to determine its potential significance. The potential significance is then described in terms of the categories given in Table 9. Mitigation options are evaluated and comparison is then made (using the same method) of potential significance before mitigation and potential significance after mitigation (to advise the EAP).

Table 9: Categories used to describe significance rating (adjusted from DEAT, 2002)

SIGNIFICANCE	DESCRIPTION
Insignificant or Positive (4-22)	There is no impact or the impact is insignificant in scale or magnitude as a result of low sensitivity to change or low intrinsic value of the site, or the impact may be positive.
Low (23-36)	An impact barely noticeable in scale or magnitude as a result of low sensitivity to change or low intrinsic value of the site, or will be of very short-term or is unlikely to occur. Impact is unlikely to have any real effect and no or little mitigation is required.
Medium Low (37-45)	Impact is of a low order and therefore likely to have little real effect. Mitigation is either easily achieved. Social, cultural and economic activities can continue unchanged, or impacts may have medium to short term effects on the social and/or natural environment within site boundaries.
Medium (46-55)	Impact is real, but not substantial. Mitigation is both feasible and fairly easily possible, but may require modification of the project design or layout. Social, cultural and economic activities of communities may be impacted, but can continue (albeit in a different form). These impacts will usually result in medium to long term effect on the social and/or natural environment, within site boundary.
Medium high (56-63)	Impact is real, substantial and undesirable, but mitigation is feasible. Modification of the project design or layout may be required. Social, cultural and economic activities may be impacted, but can continue (albeit in a different form). These impacts will usually result in medium to long-term effect on the social and/or natural environment, beyond site boundary within local area.
High (64-79)	An impact of high order. Mitigation is difficult, expensive, time-consuming or some combination of these. Social, cultural and economic activities of communities are disrupted and may come to a halt. These impacts will usually result in long-term change to the social and/or natural environment, beyond site boundaries, regional or widespread.
Unacceptable (80-100)	An impact of the highest order possible. There is no possible mitigation that could offset the impact. Social, cultural and economic activities of communities are disrupted to such an extent that these come to a halt. The impact will result in permanent change. Very often these impacts are un-mitigatable and usually result in very severe effects, beyond site boundaries, national or international.

7. BIODIVERSITY ASSESSMENT

Vanrhynsdorp Gannabosveld is part of the Succulent-Karoo Biome (Mucina et al., 2006). The Succulent Karoo is strongly influence by winter rainfall and fog and has been compared to a desert harbouring a range of succulent plants beyond compare. It has a bulb flora richer than any other arid region and produces spectacular displays of annual flowers after good rains. The rainfall predictability sets it apart from other deserts and is commonly accepted as the main reason for the abundance of leaf succulents (which with their shallow root system is not well adapted to prolonged drought), bulbs and spring flowers. Unfortunately, only a small percentage of the Succulent Karoo is formally protected (Mucina et. al., 2006) although the resent proclamation of the Knersvlakte Nature Reserve would have added to the protection level, and it was also felt that the (then) protected area system did not adequately incorporate key ecological components and evolutionary biodiversity drivers like riverine and sand movement corridors, quartz patches, edaphic interfaces, climatic and upland-lowland gradients. Land use is primarily focused on agriculture, with livestock grazing the dominant land use in 90% of the region. Before widespread human settlement indigenous antelope would have migrated across the landscape in search of grazing, no doubt having an overall positive influence on biodiversity. However, fences, permanent watering points and high domestic stock densities almost certainly led to degradation, loss of vegetation cover, loss of seed bank and a negative influence on soil quality (Mucina et. al., 2006).

7.1 BIOPHYSICAL ENVIRONMENT

<u>Centres of Endemism</u>: The proposed site falls within the Knersvlakte Centre of Endemism, but is located on the sandy soils, dominated by Gannabos (*Salsola* species), to the south of the true quarts-field flora and although it is likely that the veld will support a number of annual and geophyte flora (which can result in spectacular flower displays in spring after good rains), it is unlikely that the proposed development (given its relative small size and location) will result in any significant impact on the true Knersvlakte vegetation.

<u>Heuweltiles</u>: No "heuweltjies" (ascribed as ancient termite mounds with soils more fertile that that of its surroundings) were observed on the site or its immediate surroundings. There is a marked difference in biodiversity on and between these heuweltjies.

CBA or ESA: According to the Western Cape Biodiversity Spatial Plant, the site is located within an ecological support area identified as a water recharge area. In this case the proposed site is located on a sandy plain sloping towards the Droë River to its northwest), but with developed vineyards adjacent and directly in the path of any surface drainage. Underground water recharge will not be significantly hampered by the proposed development; since the surface area is very small and will not be impregnable (underground water recharge will still be able from the site).

<u>Connectivity</u>: The location (adjacent to existing agricultural land) and relative small size of the site will also not lead to a significant reduction in connectivity.

<u>Other</u>: The site visit showed no other significant geographical features such as watercourses, wetlands, upland- down land gradients or vegetation boundaries on the site or limited to the site. The site is located near an area already transformed as a result of intensive agriculture (vineyards next to the Droë River).

7.2 THREATENED OR PROTECTED ECOSYSTEMS

The Vanrhynsdorp Gannabosveld vegetation type is not vulnerable or threatened with more 79% still remaining in its natural state. However, at present little of this vegetation type is formally conserved in South Africa. It is thus important the viable areas are considered for inclusion into Conservation areas or CBA's or ESA's. Although it is located within the larger Knersvlakte Centre of Endemism and within an ecological support area, it is unlikely that the proposed footprint will have any significant impact on local or national conservation targets.

No Red list species was encountered (Heading 5.3.1), or species protected in terms of NEMBA (Heading 5.3.2), or species protected in terms of the NFA (Heading 5.3.3). A small number of the alien *Prosopis* trees and the shrub *Atriplex lindleyi* were observed and an alien eradication plan should be implemented to ensure the control of these species within the development footprint.

7.3 CUMMULATIVE IMPACTS

The Department of Environmental Affairs requires that specialist evaluates the accumulative impacts of all other renewable energy sites within a 30 km radius of the proposed development. According to the information obtained from the Department of Environmental Affairs renewable energy database website for South Africa (https://dea.maps.arcgis.com/apps/webappviewer), there are potentially three renewable energy sites within a 30 km radius of the proposed Vanrhynsdorp site (Figure 6), not including the Keren Vanrhynsdorp site, which refers to this application. Seven potential other renewable energy facilities are mapped within a 30 km radius (Refer to Table 10 and Figure 6. However, the Site 6 application was withdrawn and the Site 7 application refers to the same site as this application.

Table 10: Potential renewable energy sites within 30km of the proposed Vanrhynsdorp Solar site

Na	me	Туре	MW	Vegetation type
1.	Orlight SA Solar PV Plant (Approved)	Solar PV	20	Vanrhynsdorp Gannabosveld
2.	Romano Solar on Pr. 334 of Farm 292, Vredendal (Approved)	Solar PV	10	Namaqualand Spinescent Grassland Vanrhynsdorp Gannabosveld
3.	Matzikama Solar Park on Pr. 414 of Farm 292, Vredendal (Approved)	Solar PV	10	Namaqualand Spinescent Grassland Namaqualand Strandveld
4.	Solar plant northwest of Vredendal (Approved)	Solar PV	30	Namaqualand Strandveld Namaqualand Spinescent Grassland
5.	Inca Wind Energy facility on Farm 293 (Approved)	Wind	30	Namaqualand Strandveld
6.	Proposed Keren Energy Solar (Withdrawn)	-	-	N/a
7.	N/a Refers to the same site as this application	-	-	N/a

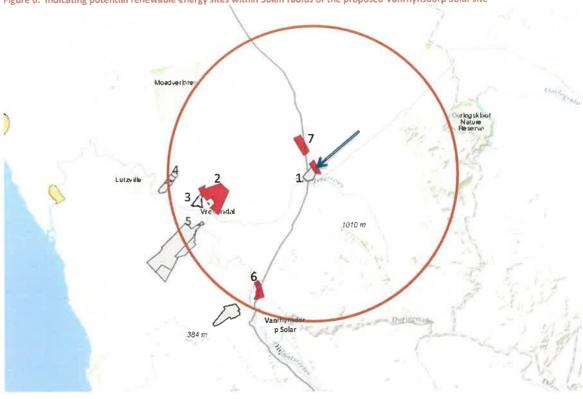
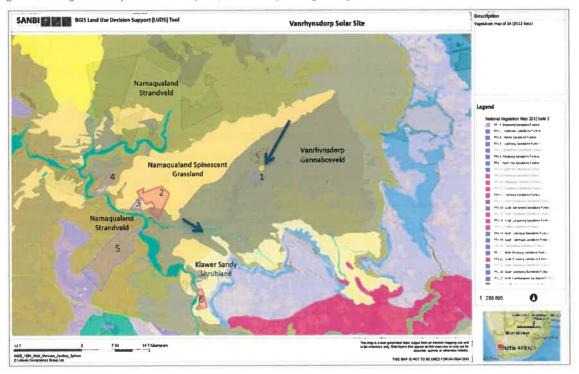


Figure 6: Indicating potential renewable energy sites within 30km radius of the proposed Vanrhynsdorp Solar site





The proposed Vanrhynsdorp development is small (±10ha) and will impact on Vanrhynsdorp Gannabosveld. Vanrhynsdorp Gannabosveld vegetation type is not considered vulnerable or threatened with more 79% still remaining in its natural state. Ecological connectivity is still very good for most of the Vanrhynsdorp area (the

veld being mainly natural grazing land). Because of the small size of the proposed footprint is unlikely to have any significant impact on connectivity the ecological support area. Floristically, no protected plant species or red-listed plant species were encountered. In the case of the Vanrhynsdorp Solar site, two other renewable energy sites, within 30km, may impact on the same vegetation type namely Site 1 and 2 in Figure 6 & Figure 7. Both sites are relative small (10 MW & 20 MW), which should relate to approximately 30 ha in total. Together with the Vanrhynsdorp Solar site it relates to approximately a 40-50 ha impact on this vegetation type out of roughly 540 700 ha of this vegetation type (of which almost 79% are still believed to be in fairly natural state). The impact of the Vanrhynsdorp solar site is thus roughly 0.0018%, while the cumulative impact is roughly 0.0092%.

Cumulative impacts for this project was calculated taking into account the small size of the proposed development, the impact of similar developments within a 30km radius on the same vegetation type, connectivity, potential critical biodiversity areas or ecological support areas and the impact on protected species as well as land-use, geology and soils, fauna and avi-fauna (Refer to Table 11).

7.4 IMPACT EVALUATION

Table 11 rates the significance of environmental impacts associated with the proposed development. It also evaluates the expected accumulative effect of the proposed development as well as the No-Go option.

Table 11: Significant rating of impacts associated with the proposed development (including the No-Go option)

Aspect	Short description	cv	Lik	Dur	Ext	Sev	Sig. before Mit.	cv	Lik	Dur	Ext	Sev	Sig. after Mit.	Short discussion
Geology & soils	Possible impact on special habitats (e.g. true quartz or "heuweltjies")	2	î	3	î	1	12	2	1	3	i,	1	12	No special features encountered. The impact on geology and soils is expected to be very low. No mitigation required.
Land use and cover.	Possible impact on socio- economic activities as a result of the physical footprint or associated activities.	3	*	3	1	1	27	3	3	3	1	1	24	The proposed development will impact on a small area used for grazing by the landowner. Loss of grazing will be barely perceptible within the larger property.
Vegetation type	Possible loss of vegetation and associated habitat.	3	à	3	1	2	30	(3)	a	3	í	i	24	More than 79% of this vegetation remains in its natural state, but little formally conserved. Mitigation - Minimise development footprint.
Corridors and conservation priority areas	Possible loss of identified terrestrial and aquatic critical biodiversity areas, ecological support areas or ecological corridors.	35.7	A	3	1	2	130	3	3	3.	31	1	24	The development will impact on an ESA and the Knersvlakte Centre of Endemism. However, because of the small footprint it is not expected to have a significant impact on conservation targets. Mitigation – minimise footprint.
Watercourses and wetlands	Possible impact on natural water resources and its associated ecosystem.	0	0	0	0	0	0	0	0	0	0	0	o	Not applicable
Flora	Possible loss of threatened or protected species.	1001	4	3	1	2	30	3	3	3	ï	1	24	No protected or red-data species encountered (although it is possible that some annuals or geophytes that could not be observed during the study might be found). However, it is highly unlikely that they will be restricted to this area alone or that any significant impact may result).
Fauna	Possible impact on species as well as potential loss of threatened or protected species.	3	2	3	1	1	21	3	2	3	1	1	21	Unlikely to impact significantly on any single species. No mitigation required.

Aspect	Short description	cv	Lik	Dur	Ext	Sev	Sig. before Mit.	cv	Lik	Dur	Ext	Sev	Sig. after Mit.	Short discussion
Avi-fauna	Possible impact on species as well as potential loss of threatened or protected species.	3	2	3.	1	1	.21	3	2	3	1	1	21	Unlikely to impact significantly on any single species. No mitigation required.
Invasive alien species	Possible allen infestation as a result of activities.	(3)	3	3	i	2	27	oj.	ä	3	i	1	18	Both alien species encountered must be eradicated from the footprint as part of construction and an ongoing eradication program must be part of maintenance.
Veld fire	The risk of veld fires as a result of the proposed activities.	:3	Э	2	3	2	30	3	i	2	1	1	15	Veld fire risk is considered high and must be addressed appropriately through the construction EMP.
Accumulative	Accumulative impact associated with the proposed activity.	(3)	A	3	3	2	36	3	4	3	1	13	27	The overall impact is considered to be relatively low, because of the small size, but good environmental control during construction is imperative.
No-Go alternative	Potential environmental impact associated with the no-go alternative.	3	1	1	1	1	12						O	The above impacts will not occur, and the status quo will remain (livestock grazing as the main land use).

Significance before mitigation: The impact assessment suggests that the proposed Vanrhynsdorp development is expected to have a Low cumulative impact, with the most significant aspect being the low potential impacts on vegetation type, corridor and conservation priority areas, flora and accidental veld fires. The evaluation takes into account on the relative small size of the proposed development and its location adjacent to existing agricultural land (transformed land).

Significance after mitigation: Since the proposed development footprint needs only be approximately 50% of the 20ha, there is great potential for micro-adjustment of the final layout plans. Even though the impact is already considered low it will still be possible to reduce direct impacts on other features of significance through layout adjustments, search & rescue and topsoil management. The potential impact on the regional status of the vegetation type and associated biodiversity features (e.g. corridor function or special habitats) is considered low. No irreversible species-loss, habitat-loss, connectivity or associated impact can be foreseen from locating and operating the solar facility on the proposed site. With mitigation the impact on biodiversity features can be reduced but will stay Low.

The NO-GO option: The "No-Go Alternative" alternative will not result in significant gain in regional conservation targets, the conservation of rare & endangered species or gain in connectivity. At the best the No-Go alternative will only support the "status quo" on the site. On the other hand the pressure on Eskom facilities, most of which is currently still dependant on fossil fuel electricity generation, will remain. Solar power remains a much cleaner and more sustainable option for electricity production.

Biodiversity Assessment Addendum

Vanrhynsdorp

Page 27

8. RECOMMENDATIONS

Having evaluated and discussed the various biodiversity aspects associated with the development, the most significant impacts are expected to be the potential impacts on:

- The ecological support area;
- The Knersvlakte Centre of Endemism;
- The small potential impact on conservation worthy plants relating to potential red-data species not visible during the two site visits (e.g. annuals and bulbs).

However, it is considered unlikely that the proposed project will contribute significantly to any of the following:

- Significant loss of vegetation and associated habitat in terms of local or national conservation targets;
- Loss of ecological processes (e.g. migration patterns, pollinators, river function etc.) due to development and operational activities;
- Significant loss of local biodiversity and threatened plant species;
- Significant loss of ecosystem connectivity (e.g. corridor function).

Lastly it is felt that good environmental planning and control during construction, the appointment of a suitably qualified ECO and the implementation of an approved EMP, could further reduce the risk of potential environmental impact.

With the available information to the author's disposal it is recommended that project be approved since it is not associated with irreversible environmental impact, provided that mitigation is adequately addresses.

9. IMPACT MINIMIZATION

There are numerous possibilities for mitigation measures to lessen the direct impact during construction (and operational) phases, of which the overriding goal should be to clearly define the final layout which must aim at minimising the disturbance footprint.

- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must be developed by a suitably experienced Environmental Assessment Practitioner.
- A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase
 in terms of the EMP and the Biodiversity study recommendations as well as any other conditions
 pertaining to other specialist studies and requirements of any competent authority.
- <u>Before any work is done the footprint must be clearly demarcated</u>. The demarcation must aim at minimum footprint and minimisation of disturbance.
- Topsoil (the top 15-20 cm) must be removed and protected and re-used for rehabilitation purposes of suitable areas on site or within the immediate surroundings (Seedbed protection).
- Before construction the footprint must be scanned by a botanist or suitably qualified ECO in order to identify the plants listed for Search & Rescue. The Botanist must advise on the best way for search & rescue and must also take the following into account:
 - These plants must be transplanted outside of the disturbance footprint, but within the same vegetation type (preferably the immediate surroundings of the site).
 - o A watering program must be implemented for transplanted plants.
- Lay-down areas or construction camp sites must be located within areas already disturbed or areas of low
 ecological value and must be pre-approved by the ECO.
- Indiscriminate clearing of any area outside of these footprints may not be allowed.
- All construction areas must be suitably rehabilitated on completion of the project.
 - This includes the removal of all excavated material, spoil and rocks, all construction related material and all waste material.
 - This must include re-using the protected topsoil as well as shaping the area to represent the original shape of the environment.
- An integrated waste management approach must be implemented during construction.
 - Construction related general and hazardous waste may only be disposed of at approved waste disposal sites.
 - Clean spoil from excavation work should be used as fill where possible.
 - All rubble and rubbish should be collected and removed from the site to a Municipal approved waste disposal site.

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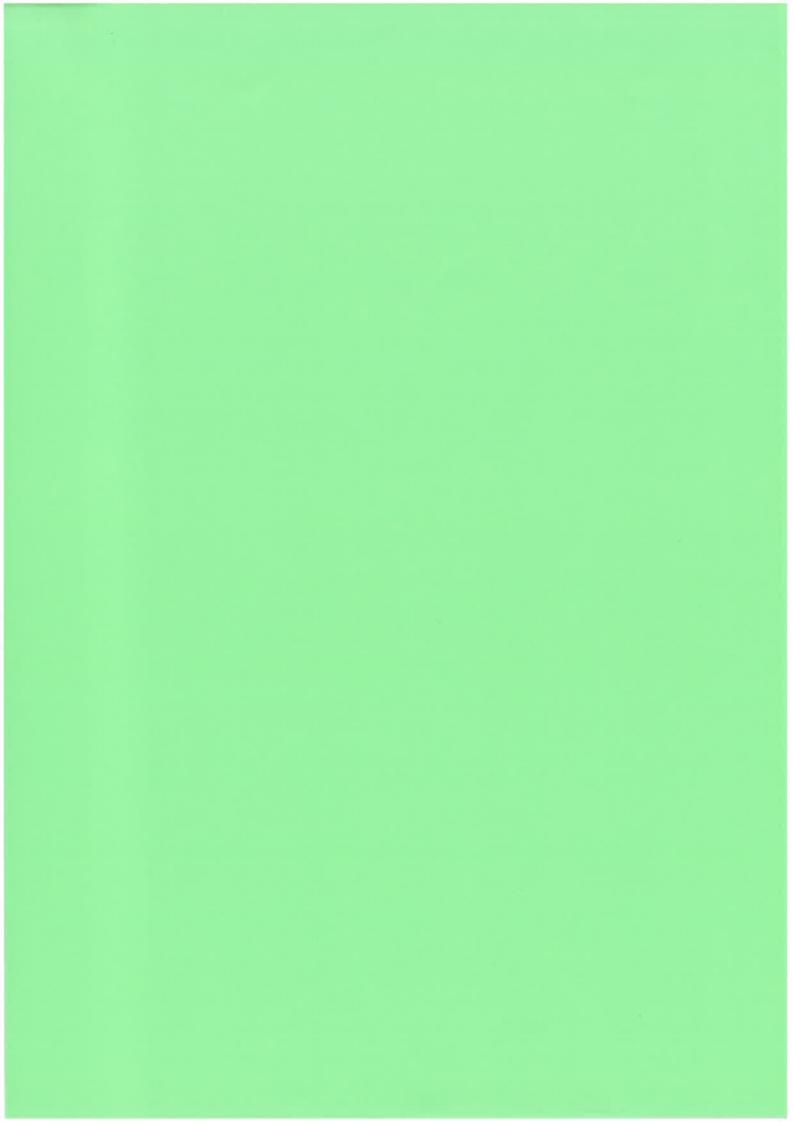
APPENDIX 1

Plant species checklist for Vanrhynsdorp Gannabosveld (SANBI: BGIS)

FAMILY NAME	GROWTH FORM	SPECIES NAME
MOLLUGINACEAE	Herbs	Adenogramma glomerata
CRASSULACEAE	Succulent Shrubs	Adromischus sphenophyllus
ASTERACEAE	Herbs	Amellus microglossus
MESEMBRYANTHEMACEAE	Succulent Shrubs	Antimima dasyphylla
MESEMBRYANTHEMACEAE	Succulent Herbs	Apatesia helianthoides
MESEMBRYANTHEMACEAE	Succulent Herbs	Apatesia sabulosa
ASTERACEAE	Herbs	Arctotis hirsuta
MESEMBRYANTHEMACEAE	Succulent Shrubs	Aridaria brevicarpa
MESEMBRYANTHEMACEAE	Succulent Shrubs	Aridaria noctiflora subsp. noctiflora
ASPARAGACEAE	Low Shrubs	Asparagus capensis var. capensis
ASPARAGACEAE	Low Shrubs	Asparagus suaveolens
IRIDACEAE	Geophytic Herbs	Babiana minuta
IRIDACEAE	Geophytic Herbs	Babiana salteri
IRIDACEAE	Geophytic Herbs	Babiana sambucina var. longibracteata
POACEAE	Graminoids	Bromus pectinatus
MESEMBRYANTHEMACEAE	Succulent Herb	Brownanthus glareicola
MESEMBRYANTHEMACEAE	Succulent Shrubs	Caulipsolon rapaceum
ASTERACEAE	Low Shrubs	Chrysocoma longifolia
ASTERACEAE	Herbs	Cotula microglossa
ASTERACEAE	Herb	Cotula pedunculata
SCROPHULARIACEAE	Herbs	Cromidon corrigioloides
TECOPHILAEACEAE	Geophytic Herbs	Cyanella orchidiformis
MESEMBRYANTHEMACEAE	Succulent Shrubs	Delosperma crassum
ASTERACEAE	Herbs	Dimorphotheca sinuata
HYACINTHACEAE	Geophytic Herbs	Dipcadi crispum
MESEMBRYANTHEMACEAE	Succulent Shrubs	Drosanthemum deciduum
MESEMBRYANTHEMACEAE	Succulent Shrubs	Drosanthemum hispidum
MESEMBRYANTHEMACEAE	Succulent Shrubs	Drosanthemum latipetalum
MESEMBRYANTHEMACEAE	Succulent Shrubs	Drosanthemum schoenlandianum
POACEAE	Graminoids	Ehrharta ramosa subsp. aphylla
POACEAE	Graminoids	Enneapogon desvauxii
ASTERACEAE	Low Shrubs	Eriocephalus microphyllus var. pubescens
ERIOSPERMACEAE	Geophytic Herbs	Eriospermum eriophorum
EUPHORBIACEAE	Succulent Shrubs	Euphorbia aspericaulis
EUPHORBIACEAE	Succulent Shrub	Euphorbia fasciculata
EUPHORBIACEAE	Succulent Shrubs	Euphorbia mauritanica
ASTERACEAE	Herbs	Felicia namaquana
ASTERACEAE	Herbs	Felicia tenella

FAMILY NAME	GROWTH FORM	SPECIES NAME
CYPERACEAE	Graminoids	Ficinia argyropa
ASTERACEAE	Herbs	Foveolina dichotoma
AIZOACEAE	Low Shrubs	Galenia africana
AIZOACEAE	Low Shrubs	Galenia fruticosa
ASTERACEAE	Herbs	Gazania krebsiana subsp. arctotoides
ASTERACEAE	Herbs	Gazania lichtensteinii
ASTERACEAE	Herbs	Gorteria diffusa subsp. diffusa
NEURADACEAE	Herbs	Grielum humifusum
BRASSICACEAE	Herbs	Heliophila pendula
MALVACEAE	Low Shrubs	Hermannia cuneifolia
POACEAE	Graminoids	Karroochloa tenella
MESEMBRYANTHEMACEAE	Succulent Shrubs	Lampranthus uniflorus
IRIDACEAE	Geophytic Herbs	Lapeirousia exilis
IRIDACEAE	Geophytic Herbs	Lapeirousia simulans
MESEMBRYANTHEMACEAE	Succulent Shrubs	Malephora purpureo-crocea
CHENOPODIACEAE	Succulent Shrubs	Manochlamys albicans
SCROPHULARIACEAE	Herbs	Manulea altissima subsp. longifolia
HYACINTHACEAE	Geophytic Herbs	Massonia echinata
IRIDACEAE	Geophytic Herbs	Moraea galaxia
IRIDACEAE	Geophytic Herbs	Moraea miniata
ASTERACEAE	Herbs	Nestlera biennis
ASTERACEAE	Herbs	Oncosiphon suffruticosum
HYACINTHACEAE	Geophytic Herbs	Ornithogalum diluculum
ASTERACEAE	Herbs	Osteospermum pinnatum
OXALIDACEAE	Geophytic Herbs	Oxalis annae
OXALIDACEAE	Geophytic Herbs	Oxalis compressa
OXALIDACEAE	Geophytic Herbs	Oxalis copiosa
OXALIDACEAE	Geophytic Herbs	Oxalis pes-caprae
OXALIDACEAE	Geophytic Herbs	Oxalis purpurea
POACEAE	Graminoids	Pentaschistis patula
MESEMBRYANTHEMACEAE	Succulent Herbs	Phyllobolus nitidus
PLANTAGINACEAE	Herbs	Plantago cafra
MESEMBRYANTHEMACEAE	Succulent Herbs	Psilocaulon junceum
MESEMBRYANTHEMACEAE	Succulent Herbs	Psilocaulon leptarthron
ASTERACEAE	Low Shrubs	Pteronia paniculata
ASTERACEAE	Herbs	Rhynchopsidium pumilum
MESEMBRYANTHEMACEAE	Succulent Shrubs	Ruschia fugitans
CHENOPODIACEAE	Succulent Shrubs	Salsola namibica

FAMILY NAME	GROWTH FORM	SPECIES NAME	
CHENOPODIACEAE	Succulent Shrubs	Salsola zeyheri	
SCROPHULARIACEAE	Low Shrubs	Selago albida	
IRIDACEAE	Geophytic Herbs	Sparaxis galeata	
POACEAE	Graminoids	Stipa capensis	
POACEAE	Graminoids	Stipagrostis ciliata	
POACEAE	Graminoids	Stipagrostis zeyheri subsp. macropus	
AMARYLLIDACEAE	Geophytic Herbs	Strumaria unguiculata	
AIZOACEAE	Succulent Shrubs	Tetragonia hirsuta	
AIZOACEAE	Succulent Shrubs	Tetragonia sarcophylla	
ASPHODELACEAE	Geophytic Herbs	Trachyandra falcata	
ASPHODELACEAE	Geophytic Herbs	Trachyandra jacquiniana	
ASPHODELACEAE	Geophytic Herbs	Trachyandra scabra	
POACEAE	Graminoids	Tribolium pusillum	
ZYGOPHYLLACEAE	Herbs	Tribulus terrestris	
ASTERACEAE	Herbs	Tripteris microcarpa	
ASTERACEAE	Low Shrubs	Tripteris sinuata	
CRASSULACEAE	Succulent Shrubs	Tylecodon reticulatus	
CRASSULACEAE	Succulent Shrubs	Tylecodon ventricosus	
ASTERACEAE	Herbs	Ursinia pygmaea	
ZYGOPHYLLACEAE	Succulent Shrubs	Zygophyllum cordifolium	





4 December 2017

Ms Vivienne Thomson EnviroAfrica P.O. Box 5367 Helderberg 7135

Dear Ms Thomson

VANRHYNSDORP SOLAR PROJECT: BIODIVERSITY ASSESSMENT & BOTANICAL SCAN

With regards to the potential impact on bird species, I would like to add the following. Although I am not an avi-faunal specialist, I do have a keen interest in bird species in general. In my original assessment (Dated 13 April 2012) as well as the more resent addendum (Dated 20 June 2017), I only touched very briefly on the potential impact on bird species as I thought it highly unlikely that the proposed solar panels will impact significantly on any bird species. The main reason being that the solar facility will have a relative small footprint of which the main aspect will be the construction of approximately 10 ha of solar panels (at ground level).

The only other aspect of the proposed solar project that may potentially impact on bird species will be the addition of new (11KVa) overhead power line. However, since the power lines will follow existing overhead cable lines for the most part the potential additional impact was considered very low. This coupled with the fact that during four site visits (over various seasons), the author did not observe any significant larger bird species on or in the vicinity of the proposed site especially collision prone larger birds (apart from one Korhaan to the east of the property). The site itself is located near to existing agricultural land (and its associated activities), and for the most part further than 500 m away from the nearest watercourse, which is the seasonal Droë River (a tributary to the Troe-Troe River). The vineyards may attract a number of smaller bird species during the harvesting season, which in turn might attract some larger birds of prey (e.g. hawks & falcons).

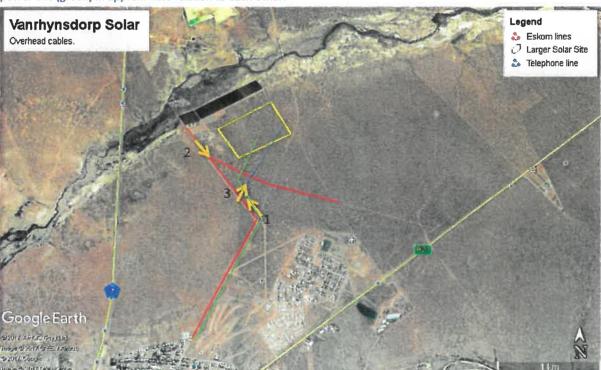
Collision prone birds are generally associated with larger terrestrial bird species with a high ratio of body weight to wing surface (birds with low manoeuvrability) or species that fly at high speed when foraging or commuting through the area.

With regards to the potential impact on bird species:

 The proposed site is not expected to have any significant impact on bird habitat, as no natural roosting or breeding areas were observed (larger birds of prey in this area tend to keep closer to the Maskam and Bokkeveld Mountains – personal observance).

- The proposed site is also located well away from any mountains or ridges that might facilitate natural updrafts, meaning that it is highly unlikely to have any impact on soaring birds (e.g. storks or cranes and most raptors).
- The Droë River is a seasonal stream, which seemingly does not support any significant larger bird life (although this might alter somewhat when the stream is in flow).
- Most importantly, however, is the fact that the proposed development will only add a very small potential additional impact zone as the site and its immediate surroundings are already criss-crossed by existing overhead cables (both electrical infrastructure and telephone lines) (Figure 1).
- As precautionary measure bird flappers could be installed on the section of the new line that does not run parallel with existing infrastructure.

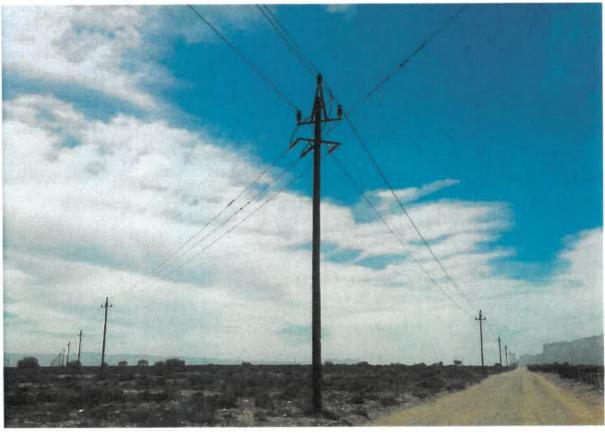
Figure 1: Google image showing the existing nearby Eskom lines (red) & telephone lines (blue) and the proposed new power line (green) in approximate relation to each other.



Vanrhynsdorp Solar P a g e | 2

Photo 1: Photo indicating the overhead power and the telephone lines (Taken from position 1 in Figure 1)





Vanrhynsdorp Solar Page | 3



Photo 3: Photo showing the telephone lines running next to the site (Photo taken from Position 3 in Figure 1)

As a result of the existing overhead infrastructure and the low bird activity that was observed in the open plains near the proposed site, the potential impact of the additional power lines was not considered to have any significant additional environmental impact.

However, as a pre-cautionary measure the power lines can be made more visible by adding (for instance) bird flappers to the line.

Kindest regards

Peet Botes

Vanrhynsdorp Solar Page | 4

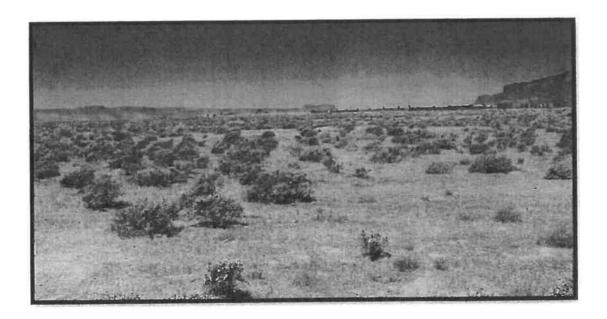
Appendix D2:	Original Bio	diversity Ass	essment an	d Botanical S	Scan (2012)	

VANRHYNSDORP KEREN ENERGY HOLDINGS

BIODIVERSITY ASSESSMENT & BOTANICAL SCAN

A preliminary Biodiversity Assessment (with botanical input) taking into consideration the findings of the National Spatial Biodiversity Assessment of South Africa.

APRIL 13, 2012 (Revised)



PREPARED BY: PB Consult

PREPARED FOR: ENVIROAFRICA CC

REQUESTED BY: KEREN ENERGY HOLDINGS (Pty) Ltd

O

EXECUTIVE SUMMARY - MAIN CONCLUSIONS

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MAIN VEGETATION TYPES	Vanrhynsdorp Gannabosveld is part of the succulent Karoo Biome and described as occurring mainly on flat or very slightly undulating landscal supporting succulent shrubland dominated by Salsola, Drosanthemus Rushia and some disturbance indicators such as short lived Aizoaced including representatives of the genera Galenia, Psilocaulon, Caulipsola and Mesembryanthemum (Mucina & Rutherford, 2006) Least Threatened: Although more than 79% of this vegetation type remains, none is formally conserved. Critical Biodiversity Area: Please note that the proposed Vanrhynsdo solar site location falls within such a Critical Biodiversity Area (Figure 10).		
LAND USE AND COVER	The study area is situated on agricultural farmland mainly used for stock grazing. Overhead cables are located on the property.		
RED DATA PLANT SPECIES	however, this doe seasonable rainfal		
IMPACT ASSESSMENT		-	

RECOMMENDATION

In summary, all areas with remaining natural vegetation, especially when these features show good connectivity with the surrounding natural veld (e.g. corridors) should be considered as significant. In this case the proposed location also co-insides with an area identified as a Critical Biodiversity Area within the Matzikama Municipality. As such it places extra emphasis on the ecological importance of the area in which the site is to be located. On the other hand, the placement of a 20 ha solar site in this location is not expected to have significant impact on any single biodiversity feature but it may put pressure on regional conservation targets in that it might impede corridor connectivity.

The site visit and desktop studies described and evaluated in this document led to the conclusion that the "No-Go" alternative may result in <u>significant gain in regional conservation targets</u> (not through the conservation of significant vegetation, rare & endangered species or special habitats, but through corridor conservation) <u>and it should be considered to move the proposed final site location out of the CBA (Refer to Figure 11 for possible options).</u>

It was also clear that the specific site location cannot be rejected on the grounds of:

- the significance of the specific vegetation type (which are classified as Least Threatened),
- nor due to the impact on populations of individual species (regarded as low),
- nor due to the conservation of rare & endangered species (considered not be to be significantly impacted).
- nor for the protection of protected species (of which none was encountered),
- nor due to the impact on special or sensitive habitats (none encountered).

Thus, although the placement of the solar site location is not expected to have significant impact on any single biodiversity feature, it is expected to put <u>pressure on regional conservation targets</u> (possible impediment of corridor connectivity) due to its CBA status

On the other hand the pressure on Eskom facilities, most of which are currently still dependant on fossil fuel electricity generation, will remain. Solar power is seemingly a much cleaner, biodiversity friendly, and more sustainable long term option for electricity production. The socio-economical gain for the area could also be significant.

From the information available and the site visit, it is clear that the proposed final Vanrhynsdorp site location was fairly well chosen, but for the fact that it is situated within a Critical Biodiversity Area. It is recommended that all mitigating measures must be implemented in order to minimise the impact of the construction and operation of the facility. Although solar energy is presently not seen as a viable stand-alone technology for electricity production it will lighten the pressure on the fossil burning facilities of Eskom and in so doing will add to a more sustainable way of electricity production.

With the available information at the author's disposal it is recommended that the possibility of locating the proposed site out of the CBA must be investigated. If not possible, all mitigation measures described in this document must be implemented and the site should be located to minimise the impact on the CBA. Furthermore, a botanist or suitably qualified ECO must be appointed during the construction phase of the project.

Biodiversity Assessment

CEMPTENTS

Executive Summary - main conclusionsi
Introduction1
Terms of reference2
IndEpendence & conditions2
Definitions & Abbreviations2
Definitions
Abbreviations2
References3
Project Describtion4
Description of Environment5
Location & Layout5
Methods
Topography7
Climate
Geology & Soils
Landuse and Cover
Vegetation types10
Critical Biodiversity Area (CBA)1
Vanrhynsdorp Gannabosveld13
Vegetation encountered14
Endemic or Protected plant Species1
Fauna1
Birds
Mammals1
Insects
Reptiles1
Rivers and wetlands
Invasive alien infestation

Significant biodiversity features encountered
Biodiversity Assessment
Method used
Criteria
Evaluation of Significant ecosystems22
Threatened or protected ecosystems22
Special habitats
Corridors and or conservancy networks23
Evaluation of Significant species23
Threatened or endangered species24
Protected species24
Placement and construction method24
Direct impacts
Indirect impacts26
Cumulative impacts
The no-go option27
Quantification of environmental Impacts28
No development28
Development without mitigation
Development with mitigation29
Recommendations & Impact Minimization30
Impact minimization31
General
Site specific

Figure 1: The general location of the proposed Vanrhynsdorp Keren Energy Solar Facility
Figure 2: Google image showing the proposed solar site location (approximately 20 ha)6
Figure 3: Alternative site location on recommendation from the visual impact assessment
Figure 4: A Google image showing the route (yellow line) that was walked as well as special features encountered7
Figure 5: Google image showing the difference in elevation from the SE towards the NW corner of the proposed location .8
Figure 6: A summary of climate data as given by saexplorer8
Figure 7: General soil map for the area of the proposed solar site location (SANBI BGIS)9
Figure 8: A Google image giving an indication of the land use on the proposed solar site
Figure 9: Vegetation map of SA, Lesotho and Swaziland (2006)
Figure 10: Matzikama Municipality - Critical Biodiversity Areas map, indicating the approximate location of the proposed
solar site
Figure 11: Proposed alternative (one option) which will not impact on the CBA (locate within the yellow rectangle)32
Table 1: GPS coordinates describing the boundaries of the final proposed solar site location (WGS 84 format)
Table 2: Protected tree species with a geographical distribution that may overlap the broader study area15
Table 3: Summary of biodiversity features encountered on Erf 1654, Vanrhynsdorp and their possible significance18
Photo 1: Natural veld in the study area
Photo 2: Typical vegetation encountered (note Salsola species in the foreground)
Photo 3: One of a few <i>Prosopis glandulosa</i> trees encountered on site
Photo 4: Typical layout of such a solar site (Image courtesy of Amonix, a leading designer of CPV technology)25

INTRODUCTION

Renewable energy takes many forms, including biomass, geothermal, hydropower, wind and solar. Of these, solar may be the most promising: it can be used to generate electricity or to heat water, has little visual impact, and scales well from residential to industrial levels. Solar is the fastest growing energy source in the world. It offers a limitless supply of clean, safe, renewable energy for heat and power. And it's becoming ever more affordable, more efficient, and more reliable.

According to various experts (<u>www.thesolarfuture.co.za</u>), building solar plants is in many ways more financially viable and sustainable than erecting coal fired power stations. When a coal power plant has reached its life span, usually after 40 years depending on the technology, it must be demolished and rebuild (at a huge price tag). When panels of a solar plant reach their lifespan, you only need to replace the panels. Replacing panels is becoming cheaper and better in what they do as the technology is continuously improving. South Africa has abundant coal reserves, but its reserves of solar power are even greater, and unlike coal, solar power is inflation-proof and doesn't lead to large scale destruction of landscapes or the pollution of precious water. In addition South Africa is the world's best solar energy location after the Sahara and Australia.

The advantages of Solar and other renewable power sources are clear: greater independence from imported fossil fuels, a cleaner environment, diversity of power sources, relief from the volatility of energy prices, more jobs and greater domestic economic development. All over the world, solar energy systems have reduced the need to build more carbon-spewing fossil-fuelled power plants. They are critical weapons in the battle against global warming. As the cost of solar technologies has come down, solar is moving into the mainstream and growing worldwide at 40-50% annually (www.wikepedia.org).

In 2011, the International Energy Agency said that "the development of affordable, inexhaustible and clean solar energy technologies will have huge longer-term benefits. It will increase countries' energy security through reliance on an indigenous, inexhaustible and mostly import-independent resource, enhance sustainability, reduce pollution, lower the costs of mitigating climate change, and keep fossil fuel prices lower than otherwise. These advantages are global.

Keren Energy Holdings is proposing the establishment of a 10 MW concentrated photovoltaic solar energy facility on the Remaining extent Duinen Rdr Farm 258, Vanrhynsdorp, (Western Cape Province, Matzikama Local Municipality). The facility will be established on an area of approximately 20 ha portion of the Farm, located just north of Maskamsig (Vanrhynsdorp). The purpose of the proposed facility is to sell electricity to Eskom as part of the Renewable Energy Independent Power Producers Procurement Programme. This programme has been introduced by the Department of Energy to promote the development of renewable power generation facilities.

Biodiversity Assessment Voorhynsdorp Page 1

TERMS OF REFERENCE

EnviroAfrica (Pty) Ltd was appointed by Keren Energy Holdings as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping/Environmental Impact Assessment (EIA) Process for the proposed development. PB Consult was appointed by EnviroAfrica to conduct a Biodiversity Assessment of the proposed development area.

PB Consult was appointed within the following terms of reference:

- Evaluate the general location of the proposed site and make recommendations on a specific location for the 20
- The study must consider short- to long-term implications of impacts on biodiversity and highlight irreversible impacts or irreplaceable loss of species.

INDEPENDENCE & CONDITIONS

PB Consult is an independent consultant to Keren Energy Holdings and has no interest in the activity other than fair remuneration for services rendered. Remunerations for services are not linked to approval by decision making authorities and PB Consult have no interest in secondary or downstream development as a result of the authorization of this proposed project. There are no circumstances that compromise the objectivity of this report. The findings, results, observations and recommendations given in this report are based on the author's best scientific and professional knowledge and available information. PB Consult reserve the right to modify aspects of this report, including the recommendations if new information become available which may have a significant impact on the findings of this report.

DEFINITIONS & ABBREVIATIONS

DEFINITIONS

Environmental Aspect: Any element of any activity, product or services that can interact with the environment. Environmental Impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from any activity, product or services.

No-Go Area(s): Means an area of such (environmental/aesthetical) importance that no person or activity is allowed within a designated boundary surrounding this area.

ABBREVIATIONS

BGIS	Biodiversity Geographical Information System Department of Environmental Affairs
DEA DENC	Department of Environment and Nature Conservation (Northern Cape Province)
EAP	Environmental assessment practitioner
EIA	Environmental impact assessment
EMP	Environmental management plan

NEMA

National Environmental Management Act, Act 107 of 1998

NEM: BA

National Environmental Management Biodiversity Act, Act 10 of 2004

NSBA SANBI

National Spatial Biodiversity Assessment South African National Biodiversity Institute

SKEP

Succulent Karoo Ecosystem Project

WWTW

Wastewater Treatment Works

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Biodiversity Assessment

Vonthynsdorp

POOF 3

Page 4

PROJECT DESCRIBTION

Keren Energy Holdings is proposing the establishment of a 10 MW concentrated photovoltaic solar energy facility on the Remaining extent Duinen Rdr Farm 258, Vanrhynsdorp, (Western Cape Province, Matzikama Local Municipality). The facility will be established on an area of approximately 20 ha portion of the Farm, located just north of Maskamsig (Vanrhynsdorp).

The proposed facility will utilise Concentrated Photovoltaic (CPV) technology, which aims to concentrate the light from the sun, using Fresnel lenses, onto individual PV cells. This method increases the efficiency of the PV panels as compared to conventional PV technology. An inverter is then used to convert the direct current electricity produced into alternating current for connection into the Eskom grid. A single solar generator produces approximately 66kV. In order to produce 10 MW, the proposed facility will require a number of generators arranged in multiples/arrays. The CPV panels will be elevated (2 m above ground) by a support structure, and will be able to track the path of the sun during the day for maximum efficiency. Approximately 1.8 ha is required per installed MW. A 10 MW capacity facility will thus require a development footprint of approximately 20 ha (including associated infrastructure — ancillary infrastructure). Each panel will be approximately 22 m wide by 12.5 m high. When the panels are tracking vertically the structure will have a maximum height of approximately 15 m.

The site can be accessed from Vanrhynsdorp, taking the Maskamsig road north onto the existing secondary road leading north towards the Farm De Duinen. However, additional temporary access roads will have to be established on site. Site preparation will include clearance of vegetation at the footprint of the following infrastructure:

- Support structures (approximately 148 units are proposed) (excavations of 1 m² by 5 m deep)
- Switchgear
- Inverters
- Workshops
- Trenches for the underground cabling

The activities may require the stripping of topsoil, which will need to be stockpiled, backfilled and/or spread on site. All in all, the proposed facility can be likened to light agriculture, with the exception that natural vegetation will be allowed to remain on all the non-disturbed areas. All surfaces not used for the facility and associated infrastructure will remain natural.

Biodiversity Assessment Vairhynsdorp

DESCRIPTION OF ENVIRONMENT

The aim of this description is to put the study area in perspective with regards to all probable significant biodiversity features which might be encountered within the study area. The study area has been taken as the proposed site and its immediate surroundings. During the desktop study any significant biodiversity features associated with the larger surroundings was identified, and were taken into account. The desktop portion of the study also informs as to the biodiversity status of such features as classified in the National Spatial Biodiversity Assessment (2004) as well as in the recent National list of ecosystems that are threatened and in need of protection (GN 1002, December 2011), promulgated in terms of the National Environmental Management Biodiversity Act (NEM: BA), Act 10 of 2004. In addition the Biodiversity Sector plan for Saldanha Bay, Bergrivier, Cederberg and Matzikama Municipalities (2010) was also taken into account, especially with regard to Critical Biodiversity Areas (CBA's), species and special habitats.

LOCATION & LAYOUT

Vanrhynsdorp is situated Western Cape Province (Matzikama Local Municipality), just north of Klawer, next to the N7. The proposed Vanrhynsdorp Solar Site will be located on the Remaining extent Duinen Rdr Farm 258, Vanrhynsdorp. The facility will be established on an area of approximately 20 ha, on a portion of the Farm, located just north of Maskamsig (Vanrhynsdorp).

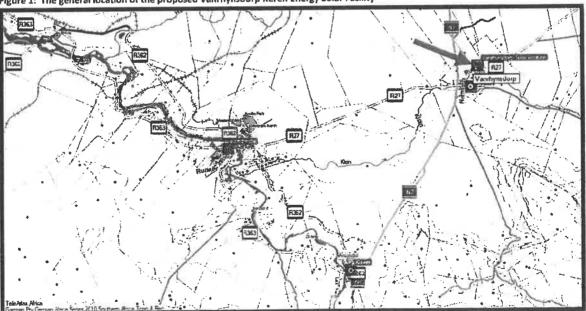


Figure 1: The general location of the proposed Vanrhynsdorp Keren Energy Solar Facility

Figure 2 indicates the proposed final site location. However, the visual impact assessment suggested a new site location somewhat west of the proposed site location (Refer to Figure 3). The biodiversity assessment for both site locations is expected to be the same. Please note that this biodiversity assessment was done for the proposed site location and all reference to the "site", refer to the location described in Figure 2 and Table 1.

Biodiversity Assessment Vanrhynsdorp Page 5

Page 6

Figure 2: Google image showing the proposed solar site location (approximately 20 ha)



Figure 3: Alternative site location on recommendation from the visual impact assessment

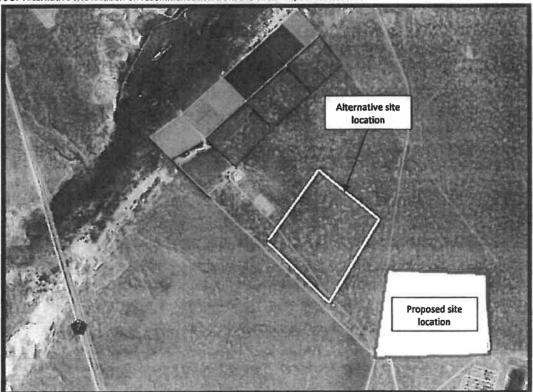


Table 1: GPS coordinates describing the boundaries of the final proposed solar site location (WGS 84 format)

DESCRIPTION	LATITUDE AND LONGITUDE	ALTITUDE 145 m	
North-west corner	S31 35 12.5 E18 44 50.3		
North-east corner	S31 35 15.9 E18 45 11.3	147 m	
South-east corner	S31 35 30.1 E18 45 09.0	151 m	
South-west corner	S31 35 27.2 E18 44 44.9	147 m	

METHODS

Various desktop studies were conducted, coupled by a physical site visit at the end of January 2012 and further desktop studies. The timing of the site visit was reasonable in that essentially all perennial plants were identifiable, but the bulb and annual flowers was not recognisable and the possibility remains that a number of species may have been missed. However, the author is confident that a fairly good understanding of the biodiversity status in the area was obtained.

The survey was conducted by walking through the site (Refer to Figure 4) and examining, marking and photographing any area of interest. Confidence in the findings is high. During the site visit the author endeavoured to identify and locate all significant biodiversity features, including rivers, streams or wetlands, special plant species and or specific soil conditions which might indicate special botanical features (e.g. rocky outcrops or silcrete patches).



Figure 4: A Google image showing the route (yellow line) that was walked as well as special features encountered

TOPOGRAPHY

The solar site is located on an almost level area on a slightly undulating landscape, just north-west of Maskamsig (Vanrhynsdorp), approximately 3 km north of town. Elevation data in Table 1 and Figure 5, shows that the site slopes very slightly from the south-east towards the north-west (in the direction of the Droë River, which is located approximately 2 km north-west of the proposed location). Elevation varies from 151 m (south-east corner) towards the north-west at 145 m with an average slope of 0.7% and an elevation loss of approximately 9 m. No wetlands even drainage lines were observed on site.

Biodiversity Assessment Vanithynsdorp Page 7

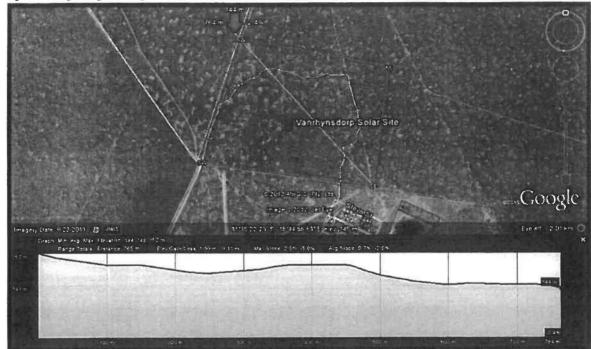
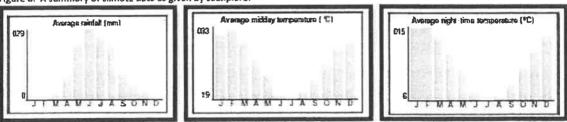


Figure 5: Google image showing the difference in elevation from the SE towards the NW corner of the proposed location

CLIMATE

All regions with a rainfall of less than 400 mm per year are regarded as arid. Vanrhynsdorp normally receives about 133 mm of rain per year and because it receives most of its rainfall during winter it has a Mediterranean climate. It receives the lowest rainfall (0 mm) in January and February and the highest (29 mm) in June. The monthly distribution of average daily maximum temperatures (centre chart below) shows that the average midday temperatures for Vanrhynsdorp range from 19.3°C in July to 32.3°C in February. The region is the coldest during July when the temperature drops to 5.9°C on average during the night (www.saexplorer.co.za).

Figure 6: A summary of climate data as given by saexplorer



GEOLOGY & SOILS

According to Mucina and Rutherford (2006) and the SANBI Biodiversity Geographical Information System, the greater part of this area is underlain by schist's, phyllite and sandstones of the Garlep Supergroup, which

Biodiversity Assessment Vanrhynsdorp Page 8

outcrop when they are not covered by recent superficial deposits of alluvium and duripan crusts (calcrete). Soils are described as soils with minimal development usually shallow on hard weathered rock, with intermitted diverse soils (lime generally present in part or most of the landscape). Soils are generally sandy-loamy, slightly acid to alkaline, with high skeletal content. More than half of the area is classified as Ag land type, followed by Fc land type, with Db and Ae land types only of minor importance. The soils (Refer to Figure 7) show minimal development, usually shallow on hard weathered rock with or without intermittent diverse soils, with lime generally present (Mucina & Rutherford, 2006).

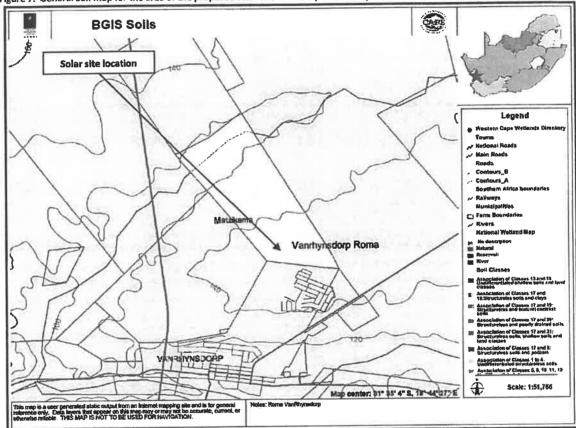


Figure 7: General soil map for the area of the proposed solar site location (SANBI BGIS)

No special soils or geology features (e.g. quartz patches or broken veld), which could support special botanical features, were observed during the site visit (or are expected).

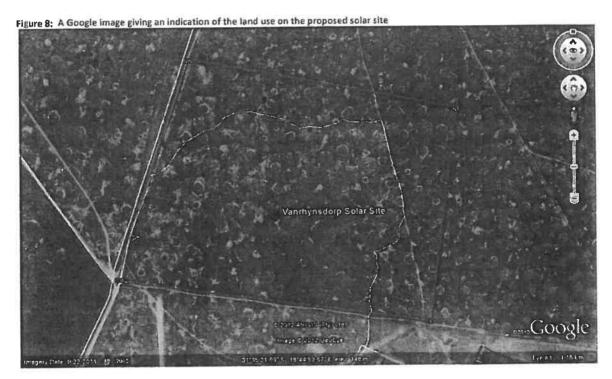
LANDUSE AND COVER

The study area is located on an almost level area in a slightly undulating landscape, just north of Vanrhynsdorp and south-east of the Droë River. The property zoned as agriculture and used for stock grazing. Smaller game species is still expected in the larger area (refer to Figure 8).

Vanrhynsdorp is situated at the outskirts of the immense, semi-desert Nama-Karoo with its vegetation of succulents and semi-arid climate. It has a prominent tourism sector and socio-economic development is supported by this industry. Due to the availability of land, it has been reported that industrial land near

Biodiversity Assessment Vanrhynsdorp Page 9

Vanrhynsdorp is intended for power generation, manufacturing, industrial plants, distribution hubs, or major infrastructural facilities. Such developments require sizeable capital investment and often generate consequential economic growth in terms of labour and peripheral industries. The proposed project site is located in geographical proximity of the town. The main land use of the study area is grazing, and there is transmission lines located on the property. Natural vegetation forms an open low shrub layer, dominated by *Salsola* over a shorter grassy/shrub layer. Occasional individuals of the invasive alien tree, *Prosopis*, were encountered. No intensive agriculture or any other form of development was observed (footpaths criss-cross most of the site).



VEGETATION TYPES

In accordance with the 2006 Vegetation map of South Africa, Lesotho and Swaziland (Mucina & Rutherford, 2006) only one broad vegetation type is expected in the proposed area and its immediate vicinity, namely Vanrhynsdorp Gannabosveld (Darker brown in Figure 9). The site visit confirmed that only Vanrhynsdorp Gannabosveld is present in the larger study area.

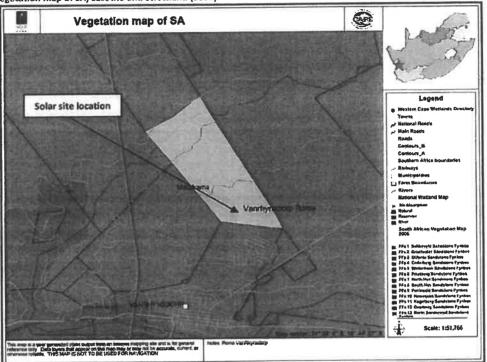
Vanrhynsdorp Gannabosveld was classified as "Vulnerable" during the 2004 National Spatial Biodiversity Assessment (NSBA). At that stage more than 79% of this vegetation still remains in its natural state, but none of this vegetation type is formally protected throughout South Africa. Recently the *National list of ecosystems* that are threatened and in need of protection (GN 1002, December 2011), was promulgated in terms of the National Environmental Management Biodiversity Act (NEM: BA), Act 10 of 2004. According to this National list, Vanrhynsdorp Gannabosveld, was de-classified from Vulnerable to Least Threatened.

Biodiversity Assessment

Vanrhynsdorp

Mucina & Rutherford (2006) noted that Vanrhynsdorp Gannabosveld is found in the Western Cape in the Namaqualand, southern Knersvlakte between Vredendal and Vanrhynsdorp at the foot of the Matsikamma and Gifberg Mountains as well as northeast of Vanrhynsdorp at altitudes varying from 100 - 300 m.

Figure 9: Vegetation map of SA, Lesotho and Swazliand (2006)



CRITICAL BIODIVERSITY AREA (CBA)

According to the Biodiversity Sector Plan (Maree & Vromans, 2010) for the Matzikama and surrounding Municipalities, Critical Biodiversity Areas (CBA's) are those areas required to meet biodiversity thresholds. They are areas of land or aquatic features (or riparian buffer vegetation alongside CBA aquatic features) which must be safeguarded in their natural state if biodiversity is to persist and ecosystems are to continue functioning. These Critical Biodiversity Areas incorporate: i) areas that need to be safeguarded in order to meet national biodiversity pattern thresholds (target area), ii) areas required to ensure the continued existence and functioning of species and ecosystems (including the delivery of ecosystem services); and/or iii) important locations for biodiversity features or rare species. The CBA network represents the most land-efficient option to achieving all biodiversity targets and terrestrial CBA includes:

- All remaining patches of critically endangered vegetation,
- All known point localities of Species of Special Concern
- Endangered, Vulnerable or Least Threatened vegetation required to meet national thresholds
- Landscape corridors required to meet the predefined thresholds for spatially explicit ecological processes (e.g. upland – lowland corridors, coastal-and-sand movement corridors).

Riodiversity Assessment Vannhynsdorp Page 11

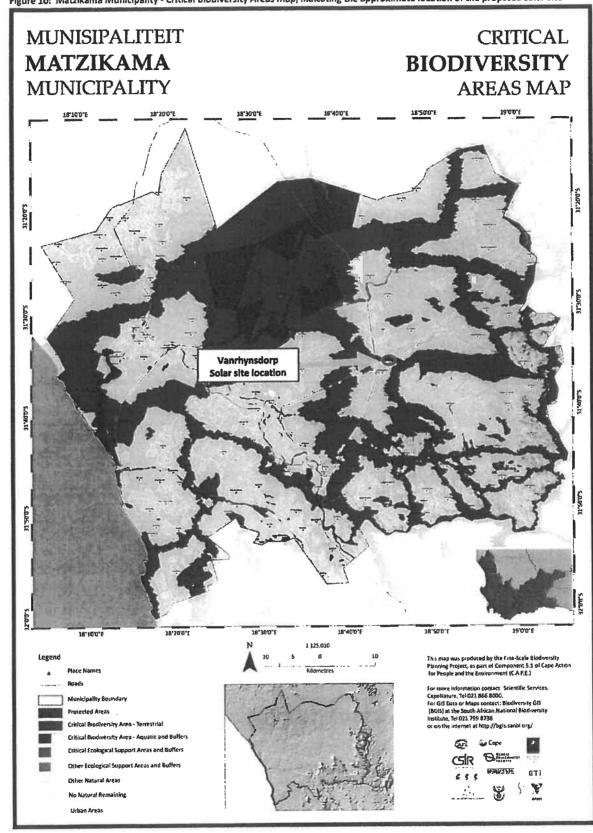


Figure 10: Matzikama Municipality - Critical Biodiversity Areas map, indicating the approximate location of the proposed solar site

According to the Biodiversity Sector Plan for the Matzikama Municipality (Maree & Vromans, 2010) and the associated Critical Biodiversity Areas map, the proposed Vanrhynsdorp solar site location falls within such a

Critical Biodiversity Area (Refer to Figure 10 above). The objective for the CBA's in the Matzikama Municipality is to maintain all natural land, rehabilitate degraded areas back to natural or near natural and to manage these areas for no further degradation.

VANRHYNSDORP GANNABOSVELD

Vanrhynsdorp Gannabosveld is part of the succulent Karoo Biome and described as occurring mainly on flat or very slightly undulating landscape supporting succulent shrubland dominated by Salsola, Drosanthemum, Rushia and some disturbance indicators such as short lived Aizoaceae, including representatives of the genera Galenia, Psilocaulon, Caulipsolon and Mesembryanthemum in the southern Knersvlakte and at the foothill of the Matsikamma and Gifberg Mountains (Mucina & Rutherford, 2006). In the south, the shale plains can acquire a grassland appearance through seasonal dominance of Bromus pectinatus and Stipa capensis.





Acocks (1953) described this vegetation as Succulent Karoo while Low & Rebelo (1996) described this vegetation as Lowland Succulent Karoo. Photo 1 gives an indication of the vegetation encountered during the site visit.

According to Mucina & Rutherford (2006) important taxa for this vegetation type includes the following:

Succulent shrubs: Caulipsolon rapaceum, Drosanthemum deciduum, Drosanthemum hispidum, Euphorbia mauritanica, Salsola namibica, Salsola zeyheri, Andromischus sphenophyllus, Antimima dasyphylla, Aridaria brevicarpa, Aridaria noctiflora, Delosperma crassum, Drosanthemum latipetalum, Euphorbia aspericaulis, Lampranthus uniflorus, Manochlamys albicans, Rushia fugitans, Tetragonia hirsuta, Tetragonia sarcophylla, Tylecodon reticulates, Tylecodon ventricosus and Zygophyllum cordifolium.

Low Shrubs: Galenia fruticosa, Asparagus capensis, Asparagus suaveolens, Chrysocoma longifolia, Eriocephalus microphyllus, Galenia africana, Hermannia cuneifolia, Pteronia paniculata, Selago albida and Tripteris sinuata.

Herbs: Gazania lichtensteinii, Foveolina dichotoma, Ocosiphon suffruticosum, Tribulus terrestris,
Adenogramma glomerata, Amellus microglossus, Arctotis hirsuta, Cotula microglossa, Cromidon
corrigioloides, Dimorphotheca sinuata, Felicia namaquana, Felicia tenella, Gazania krebsiana, Groteria

Biodiversity Assessment Vonrhynsdorp Page 13

diffusa, Grielum humifusum, Heliophila pendula, Nestlera biennis, Osteospermum pinnatum, Plantago cafra, Rhynchosidium pumilum and Tripteris microcarpa.

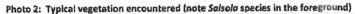
Geophytic Herbs: Babiana minuta, Babiana sambucina, Cyanella orchidiformis, Dipcadi crispum, Lapeiriousia exilis, Massonia echinata, Moraea galaxia, Moraea miniata, Oxalis annae, Oxalis compressa, Oxalis pescaprae, Oxalis purpurea, Sparaxis galeata, Strumaria unguiculata, Trachyandra falcate, Trachyandra jacquiniana and Trachyandra scabra.

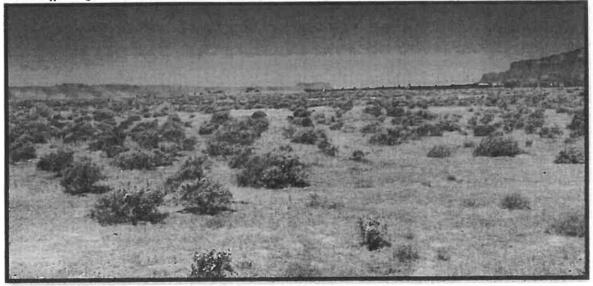
Succulent Herbs: Psilocaulon junceum, Apatesia helianthoides, Apatesia sabulosa, Phyllobolus nitidus and Psilocaulon leptarthron.

Graminoids: Stipa capensis, Bromus pectinatus, Ehrharta ramose, Enneapogon argyropa, Karroochloa tenella, Pentaschistis patula, Stipagrostis ciliata, Stipagrostis zeyheri and Tribolium pusillum.

VEGETATION ENCOUNTERED

The vegetation encountered conforms to that of Vanrhynsdorp Gannabosveld and supported an open shrubland with two layers normally present, namely a low shrub layer up to 0.5 m with a grassy/shrub under layer reaching approximately 0.2 m in height) with open patches in between (Photo 2). The alien invader tree, *Prosopis glandulosa*, was also occasionally encountered.





This vegetation is strongly influence by winter rainfall and fog and has been compared to a desert harbouring a range of succulent plants beyond compare. It has a bulb flora richer than any other arid region and produces spectacular displays of annual flowers after good rains. In addition the rainfall in the Namaqualand has been described a reliable which serves as a further explanation for its unparalleled diversity of leaf succulents, bulbs and spring flowers. It was clear that the area was at its driest which showed in the lack of species found. The top layer was absolutely dominated by *Salsola cf. zeyheri* and *Atriplex cf. lindleyi* with other species like *Aloe*,

Euphorbia mauritanica, Eriocephalus, Pteronia, Limonium sinuatum (exotic garden plant) also present (Refer to Photo 2). Various seed pods and other indicators of geophytes were observed but where not identifiable.

ENDEMIC OR PROTECTED PLANT SPECIES

According to Mucina & Rutherford (2006), various endemic succulent shrub, geophytic herbs and succulent herb species are expected in this vegetation type (Refer to Table 2). However, due to the very dry season, none of the above was identifiable. As a result the study cannot confirm that any of these species are or are not present within the proposed location. It must be noted that the vegetation type is considered "Least Threatened" (Government Notice No 1002, 9 December 2011: National list of Ecosystems that are threatened and in need of protections) and that this classification is based on plant species diversity and turnover as well as habitat transformation. The number of species per broad geographical levels for the Karoo Biome is relative low (Van Rooyen, 1988, vide Mucina & Rutherford, 2006). It is therefore very unlikely that any red data species will be confined to this site alone.

The only protected tree that might be expected to overlap with the broader study area (although unlikely) is the quiver tree (Aloe dichotoma). None has been observed in the study area.

Table 2: Protected tree species with a geographical distribution that may overlap the broader study area

SPECIES NAME	COMMON NAME	TREE NO.	DISTRIBUTION
Aloe dichotoma	Kokerboom	29	Semi-desert and desert areas usually associated with
	Quiver tree		rocky outcrops.

FAUNA

The farm is zoned agriculture and used for livestock grazing. However, it is expected that the property still supports a number of game species, birds and other fauna. However, viewed in the larger context of the farm, the 20 ha solar facility will not pose a significant loss of grazing and the proposed solar site facility is not expected to have a major impact on regional biodiversity and with mitigating and good environmental control during construction the impact could be minimised.

According to the Biodiversity Sector Plan for the Matzikama Municipality (Maree & Vromans, 2010), the following fauna is to be expected in the larger area which includes the Saldanha Bay, Bergrivier, Cederberg and Matzikama Municipalities.

BIRDS

Several endemic bird species occur in this area, e.g. Barlow's lark (*Certhilauda barlowi*). Other species in the region include the vulnerable black harrier (*Circus maurus*), which has the most restricted range of the world's 13 harrier species, Karoo bustard (*Eupodotis vigorsii*), Ludwig's bustard (*Neotis ludwigii*), Karoo chat (*Cercomela schlegelii*), dune lark (*Certhilauda erythrochlamys*), and dusky sunbird (*Nectarinia fusca*).

Biodiversity Assessment Vanrhynsdorp Page 15

Moreover, thousands of sea birds roost on sheltered islands or rest on the beaches along the West Coast. Some of these include the Cape Gannet, Flamingos, African Penguins and Waders (Maree & Vromans, 2010).

MAMMALS

Mammal species that are endemic or near endemic to the area are Van Zyl's Golden Mole (*Cryptochloris zyli*), Cape Dune Molerat (*Batyergus suillus*), Cape Gerbil (*Tatera afra*) and Grant's Golden Mole (*Eremitalpa granti*). Van Zyl's Golden Mole (*Cryptochloris zyli*) belongs to the golden mole family which is comprised of 18 species, all endemic to the African continent. Van Zyl's golden mole differs from the other species in the same genus, in that it is a smaller mole with a total length of approximately 8cm and is darker and browner with a purplish sheen. Very little is known about this Critically Endangered species as it spends most of its life underground in shallow sandy soils of the temperate, Strandveld Succulent Karoo (Maree & Vromans, 2010).

This golden mole is mainly threatened due to habitat loss through overgrazing, crop cultivation, irrigation and mining. Today, there is only one locality known to have the Van Zyl's golden mole, i.e. Compangnies Drift, 16 km inland from Lamberts Bay. Conservation initiatives should aim to conserve this species through the establishing of more Private Conservation areas such as Conservancies and Private Nature Reserves and statutory conservation areas, thereby protecting the golden moles habitat (Maree & Vromans, 2010).

INSECTS

The northern reaches of the West Coast constitute the southern-most tip of an area of endemism for darkling beetles (tenebrionid family, which includes toktokkies). Another group, found almost exclusively in southern Africa, are the monkey beetles which are concentrated in this area. Along with many types of wasps and bees, these beetles pollinate the West Coast's immense range of plant species. Perhaps the most unusual invertebrates found here are the long-tongued flies (*Memestrinidae*), which can have mouthparts up to 50 mm long. The level of richness and endemism in insect species is likely to be similar to the extraordinary richness exhibited by the plant life. Preliminary studies show that more than half of the species in some insect groups are endemic to the area, occurring nowhere else in the world (Maree & Vromans, 2010).

REPTILES

The diversity of reptile species is relatively high in the drier succulent karoo area along the west coast. Seven species of girdled lizards of the genus *Cordylus*, including the armadillo girdled lizard (*Cordylus cataphractus*, VU) are endemic to the area. Two endemic tortoise species occur in the area, namely the Namaqualand tent tortoise (*Psammobates tentorius trimeni*) and the Namaqualand speckled padloper (*Homopus signatus signatus*) (Maree & Vromans, 2010).

Brodiversity Assessment Vanithynsdorp Page 16

RIVERS AND WETLANDS

Rivers maintain unique biotic resources and provide critical water supplies to people. South Africa's limited supplies of fresh water and irreplaceable biodiversity are very vulnerable to human mismanagement. Multiple environmental stressors, such as agricultural runoff, pollution and invasive species, threaten rivers that serve the world's population. River corridors are important channels for plant and animal species movement, because they link different valleys and mountain ranges. They are also important as a source of water for human use. Vegetation on riverbanks needs to be maintained in order for rivers themselves to remain healthy, thus the focus is not just on rivers themselves but on riverine corridors.

No rivers, watercourses or even drainage lines were observed on the proposed solar location. However, the Droë River is located approximately two kilometres to the north-west of the proposed location, while the Klein River is to be found approximately 1.8 km to the south of the proposed location.

INVASIVE ALIEN INFESTATION

Most probably because of the aridity of the area, invasive alien rates are generally very low for most of this area and only occasional individuals of *Prosopis glandulosa* (Suidwesdoring) was observed.

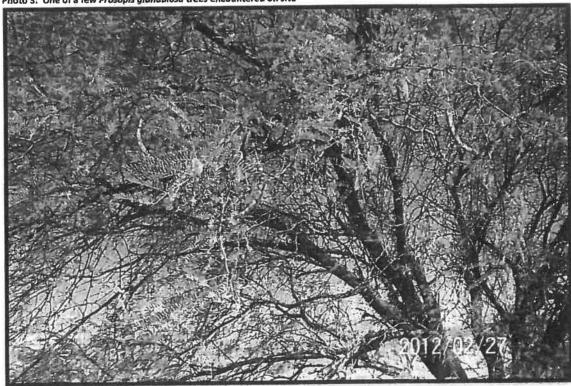


Photo 3: One of a few Prosopis glandulosa trees encountered on site

Riodiversity Assessment Vanrhynsdorp Page 17

SIGNIFICANT BIODIVERSITY FEATURES ENCOUNTERED

The table underneath gives a summary of biodiversity features encountered during the site visit and a short discussion of their possible significance in terms of regional biodiversity targets.

Table 3: Summary of biodiversity features encountered on Erf 1654, Vanrhynsdorp and their possible significance

BIODIVERSITY SHORT DESCRIPTION ASPECT		SIGNIFICANCE RATING	
Geology & soils	The soils are mostly similar throughout the study area.	No special features have been encountered on the final solar location (e.g. true quartz patches, wetland mosaics, isolated mountain peaks).	
Land use and cover	Agricultural land	Agricultural land used for grazing.	
Vegetation types	Vanrhynsdorp Gannabosveld.	Vanrhynsdorp Gannabosveld is considered "Least threatened". However, the remaining natural veld shows good connectivity with the surrounding areas and falls within an area identified as a Critical Biodiversity Area within the Matzikama Municipality.	
Endemic or protected plant species	No endemic species was observed, but it is probable that some may be found on the site.	The vegetation type is considered "Least Threatened" and that this classification is based on plant species diversity and turnover as well as habitat transformation. The number of species per broad geographical levels for the Karoo Biome is relative low and it is therefore very unlikely that any red data species will be confined to this site alone.	
Fauna	The farm is used for agricultural grazing, although small game species are still expected.	The size and location of the solar facility is not expected to have a significant impact on total grazing or the movement of game species found on the larger area.	
Rivers & wetlands	No watercourses or even drainage lines were encountered on the site.	No impact	
Invasive alien infestation	A few Prosopis trees were observed.	All alien trees on the site and its immediate surroundings should be removed (with regular follow-up).	

In summary, all areas with remaining natural vegetation, especially when these features show good connectivity with the surrounding natural veld (e.g. corridors) should be considered as significant. In this case the proposed location also co-insides with an area identified as a **Critical Biodiversity Area** within the Matzikama Municipality. As such it places extra emphasis on the ecological importance of the area in which the site is to be located. On the other hand, the placement of a 20 ha solar site in this location is not expected to have significant impact on any single biodiversity feature but it may put pressure on regional conservation targets in that it might impede corridor connectivity. The impact on populations of individual species is regarded as low, the impact on sensitive habitats is regarded as low (no sensitive habitats encountered on site), however, due to its CBA status the impact on ecosystem function is regarded as medium to medium-high (impeding corridor movement), cumulative impact on ecology is regarded as medium to medium-high (CBA status) and finally the impact on economic use of the vegetation is regarded as low.

Biodiversity Assessment

BIODIVERSITY ASSESSMENT

Biological diversity, or biodiversity, refers to the variety of life on Earth. As defined by the United Nations Convention on Biological Diversity, it includes diversity of ecosystems, species and genes, and the ecological processes that supports them. Natural diversity in ecosystems provides essential economic benefits and services to human society—such as food, clothing, shelter, fuel and medicines—as well as ecological, recreational, cultural and aesthetic values, and thus plays an important role in sustainable development. Biodiversity is under threat in many areas of the world. Concern about global biodiversity loss has emerged as a prominent and widespread public issue.

The objective of this study was to evaluate the biological diversity associated with the study area in order to identify significant environmental features which should be avoided during development activities and or to evaluate short and long term impact and possible mitigation actions in context of the proposed development.

As such the report aim to evaluate the biological diversity of the area using the Ecosystem Guidelines for Environmental Assessment (De Villiers et. al., 2005), with emphasis on:

- Significant ecosystems
 - o Threatened or protected ecosystems
 - o Special habitats
 - o Corridors and or conservancy networks
- Significant species
 - o Threatened or endangered species
 - o Protected species

METHOD USED

During May 2001, Van Schoor published a formula for prioritizing and quantifying potential environmental impacts. This formula has been successfully used in various applications for determining the significance of environmental aspects and their possible impacts, especially in environmental management systems (e.g. ISO 14001 EMS's). By adapting this formula slightly it can also be used successfully to compare/evaluate various environmental scenario's/options with each other using a scoring system of 0-100%, where any value of 15% or less indicate an insignificant environmental impact while any value above 15% constitute ever increasing environmental impact.

Using Van Schoor's formula (adapted for construction with specific regards to environmental constraints and sensitivity) and the information gathered during the site evaluation the possible negative environmental impact of the activity was evaluated.

Underneath follows a short description of Van Schoor's formula. In the formula the following entities and values are used in order to quantify environmental impact.

 $S = [(fd + int + sev + ext + loc) \times (leg + gcp + pol + ia + str) \times P]$ (as adapted for construction activities) Where

S = Significance value

fd = frequency and duration of the impact

int = intensity of the impact

sev = severity of the impact

ext = extent of the impact

loc = sensitivity of locality

leg = compliance with legal requirements

gcp = conformance to good environmental practices

pol = covered by company policy/method statement

ia = impact on interested and affected parties

str = strategy to solve issue

P = probability of occurrence of impact

CRITERIA

The following numerical criteria for the above-mentioned parameters are used in the formula.

low frequency; low duration		medium frequency; low		high frequency; low	_
	1	duration	1.5	duration	1
low frequency; medium duration		medium frequency; medium		high frequency ; medium	
	1.5	duration	2	duration	2.5
low frequency; high duration		medium frequency; high		high frequency; high	
	2	duration	2.5	duration	3

int = intensity of the impact				1	
low probability of species loss; low physical disturbance	1	medium probability of species loss; low physical disturbance	1.5	high probability of species loss; low physical disturbance	2
low probability of species loss; medium physical disturbance	1.5	medium probability of species loss; medium physical disturbance	2	high probability of species loss; medium physical disturbance	2,!
low probability of species loss; high physical disturbance	2	medium probability of species loss; high physical disturbance	2.5	high probability of species loss; high physical disturbance	3

sev = severity of the impact	
changes immediately reversible	1
changes medium/long-term reversible	2
changes not reversible	3

loc = sensitivity of location	
not sensitive	1
moderate (e.g. natural habitat)	2
sensitive (e.g. critical habitat or species)	- 2

gcp = good conservation practice	S
conformance	0
non-conformance	1

ia = impact on interested and aff	ected parties
not affected	1
partially affected	2
totally affected	3

P = probability of occurrence of Impact		
not possible (0% chance))	0	
not likely, but possible (1 - 25% chance)	0.25	
likely (26 - 50% chance)	0.50	
very likely (51 - 75% chance)	0.75	
certain (75 - 100% chance)	0.95	

ext = extent of the impact	
locally (on-site)	1
regionally (or natural/critical habitat affected)	2
globally (e.g. critical habitat or species loss)	3

leg = compliance with legal requirements	
compliance	0
non-compliance	1

pol = covered by company policy	
covered in policy	0
not covered/no policy	1

str = strategy to solve issue		
strategy in place	0	
strategy to address issue partially	0.5	
no strategy present	1	

Biodiversity Assessment

EVALUATION OF SIGNIFICANT ECOSYSTEMS

The main drivers in this vegetation type would be soil type and depth and grazing pressure (herbivore), and could largely determine plant community composition and occurrence of rare species. Grazing may be an important factor in regulating competitive interaction between plants. Certain species can act as important "nursery" plants for smaller species and are also important for successional development after disturbance. Tortoises and mammals can be important seed dispersal agents.

THREATENED OR PROTECTED ECOSYSTEMS

The site visit confirmed that the vegetation conforms to Vanrhynsdorp Gannabosveld (Refer to Figure 9). This vegetation type was classified as "Vulnerable" during the 2004 National Spatial Biodiversity Assessment (NSBA). During 2004 more than 79% of this vegetation still remained in its natural state, but none of this vegetation type was formally protected throughout South Africa. However, please note that the National list of ecosystems that are threatened and in need of protection (GN 1002, December 2011), was promulgated during 2011 in terms of the National Environmental Management Biodiversity Act (NEM: BA), Act 10 of 2004. According to this National list, <u>Vanrhynsdorp Gannabosveld</u>, has now been de-classified to a status of Least Threatened.

But, even though it has a status of "Least threatened" the proposed solar site location will be situated within an area that has been identified as a Critical Biodiversity Area (corridor) within the Matzikama Municipal Biodiversity Sector Plan (Maree & Vromans, 2010). Even though the proposed solar site is relatively small (20 ha), its placement within a CBA ensures that the impact on threatened or protected ecosystems must be regarded as medium to medium-high.

Mitigation:

- Consider moving the solar site location out of the CBA corridor.
- If the above is not possible ensure that the final placement takes the ecological process into
 consideration and will result in the least impact on the CBA corridor (e.g. placing it along the edge of
 the CBA).
- Good environmental control during the construction must be implemented.

SPECIAL HABITATS

Special Habitats include areas that are rare within the region, or which support Species of Special Concern, as well as ecosystems or ecological processes. They include Listed Threatened Ecosystems in terms of the NEMBA and other habitats protected by legislation, namely wetlands, estuaries and indigenous forests. According to the Biodiversity Sector Plan for the Matzikama and surrounding Municipalities (Maree & Vromans, 2010), the

most prominent Special Habitats occurring within these municipalities include coastal forests, rocky outcrops along the coast, wetland mosaics, inselbergs (isolated mountain peaks) and rocky coastal gorges. None of these (or other) special habitats were observed during the site visit. Furthermore, the vegetation has been classified as "Least threatened". But the proposed solar site location will be situated within an area that has been identified as a Critical Biodiversity Area (corridor) within the Matzikama Municipal Biodiversity Sector Plan (Maree & Vromans, 2010).

Overall the development of the 20 ha Keren Energy solar facility at Vanrhynsdorp is not expected to a have a significant impact on any special habitat (although it will impact on a threatened ecosystem). As a result the impact on special habitats is rated as low.

Mitigation:

None.

CORRIDORS AND OR CONSERVANCY NETWORKS

Looking at the larger site and its surroundings it shows excellent connectivity with remaining natural veld in almost all directions. Corridors and natural veld networks are still relative unscathed (apart from road networks). However, even though Vanrhynsdorp Gannabosveld has now been de-classified to a status of Least Threatened, the proposed solar site will be located within an area that has been identified as a Critical Biodiversity Area within the Matzikama Municipal Biodiversity Sector Plan (Maree & Vromans, 2010). This area was most probably specifically included into the CBA as a result of its role as a viable east-west connective corridor between large areas of natural veld. Even though the proposed solar site is relatively small (20 ha), its placement within a CBA ensures that the impact on the corridor status must thus be regarded as medium to medium-high.

Mitigation:

- Consider moving the solar site location out of the CBA corridor.
- If the above is not possible ensure that the final placement takes the ecological process into consideration and will result in the least impact on the CBA corridor (e.g. placing it along the edge of the CBA).

EVALUATION OF SIGNIFICANT SPECIES

The site visit was performed at the end of February (2012). At the time of the study the veld in the Vanrhynsdorp area was very dry. As a result none of the herb or bulbs were visible, even succulent herbs was almost absent. However, although not ideal, it was still possible to get a good feel for the vegetation, but it is possible that significant species might have been overlooked.

THREATENED OR ENDANGERED SPECIES

No threatened or endangered species were recorded during the site visit, however, this does not rule out their presence as they may be subject to seasonable rainfall and may not have been observable during the time of the site visit. It must be noted that the vegetation type is considered "Least Threatened" (Mucina & Rutherford, 2006) and that this classification is based on plant species diversity and turnover as well as habitat transformation. The number of species per broad geographical levels for the Karoo Biome is relative low (Van Rooyen, 1988, vide Mucina & Rutherford, 2006). It is therefore very unlikely that any red data species will be confined to this site alone.

During the site visit no such species were observed and in the regional context the author is of the opinion that the development of the 20 ha solar facility will not lead to irreversible species loss.

The possibility of such an impact occurring is rated as low.

Mitigation:

 With good environmental control (e.g. footprint minimisation, topsoil removal, storage and redistribution) and rehabilitation after construction (leaving the remaining area as natural as possible) the possibility of such an impact occurring will become insignificant.

PROTECTED SPECIES

No protected species was observed within the proposed solar site location.

PLACEMENT AND CONSTRUCTION METHOD

A single solar generator produces approximately 66kV. In order to produce 10 MW, the proposed facility will require a number of generators arranged in multiples/arrays. The CPV panels will be elevated (2 m above ground) by a support structure, and will be able to track the path of the sun during the day for maximum efficiency (Refer to Photo 4). Approximately 1.8 ha is required per installed MW. A 10 MW capacity facility will thus require a development footprint of approximately 20 ha (including associated infrastructure – ancillary infrastructure). Each panel will be approximately 22 m wide by 12.5 m high. When the panels are tracking vertically the structure will have a maximum height of approximately 15 m. The excavation needed for each support structures (approximately 148 units are proposed) will be 1 m² by 5 m deep. It means that apart from the associated structures, approximately 148 holes of 1 m² by 5 m deep will be excavated. Each hole must be at least 22 m from the next.

Photo 4: Typical layout of such a solar site (Image courtesy of Amonix, a leading designer of CPV technology)

The activities will require the stripping of topsoil (for the pylon holes and access roads only, leaving the remainder as natural as possible), which will need to be stockpiled, backfilled and/or spread on site. All in all the proposed facility can be likened to light agriculture, with the exception that natural vegetation can be allowed to remain on all the non-disturbed areas. All surfaces not used for the facility and associated infrastructure can remain natural (the Quantification of environmental impacts was based on the assumption that the footprint will be minimised and that areas not directly impacted by the location of infrastructure would remain almost natural).

DIRECT IMPACTS

As the name suggest, direct impacts refers to those impacts with a direct impact on biodiversity features and in this case were considered for the potentially most significant associated impacts (some of which have already been discussed above).

Direct loss of vegetation type and associated habitat due to construction and operational activities.

- Loss of ecological processes (e.g. migration patterns, pollinators, river function etc.) due to construction and operational activities. (Refer to page 22).
- Loss of local biodiversity and threatened plant species (Refer to page 22)
- Loss of ecosystem connectivity (Refer to page 23)

LOSS OF VEGETATION AND ASSOCIATED HABITAT

One broad vegetation type is expected in the study area, namely Vanrhynsdorp Gannabosveld (Refer to Vegetation encountered on page 14). Vanrhynsdorp Gannabosveld was classified as "Vulnerable" during the 2004 National Spatial Biodiversity Assessment. Within the more recent "National list of ecosystems that are threatened and in need of protection" (GN 1002, December 2011), promulgated in terms of the National Environmental Management Biodiversity Act (NEM: BA), Act 10 of 2004, the status of Vanrhynsdorp Gannabosveld has been de-classified to a status of "Least Threatened". During 2004, more than 79% of this

vegetation type is still found in a relative natural state. Thus the vegetation itself is not considered to belong to a threatened or protected ecosystem. No special habitats were encountered on site (e.g. quartz patches wetland mosaics or isolated mountain peaks), which could sustain significant smaller ecosystems. However, even though Vanrhynsdorp Gannabosveld has now been de-classified to a status of Least Threatened, the proposed solar site will be located within an area that has been identified as a Critical Biodiversity Area within the Matzikama Municipal Biodiversity Sector Plan (Maree & Vromans, 2010). Although it might not lead to significant loss of vegetation it might impact on its role as a viable east-west connective corridor between large areas of natural yeld.

Thus, even though the proposed solar site is relatively small (20 ha), its placement within a CBA ensures that the impact on the specific vegetation type must thus be regarded as medium.

<u>Mitigation</u>: The following is some mitigation which will minimise the impact of the solar plant location and operation.

- Consider moving the solar site location out of the CBA corridor.
- If the above is not possible ensure that the final placement takes the ecological process into
 consideration and will result in the least impact on the CBA corridor (e.g. placing it along the edge of
 the CBA).
- Only existing access roads should be used for access to the terrain (solar site).
- The internal network of service roads (if needed) must be carefully planned to minimise the impact on
 the remaining natural veld on the site. The number of roads should be kept to the minimum and
 should be only two-track/twee spoor roads (if possible). The construction of hard surfaces should be
 minimised or avoided.
- Access roads and the internal road system must be clearly demarcated and access must be tightly controlled (deviations may not be allowed).
- Indiscriminate clearing of areas must be avoided, only pylon sites and sites where associated infrastructure needs to be placed must be cleared (all remaining areas to remain as natural as possible).
- All topsoil (at all excavation sites) must be removed and stored separately for re-use for rehabilitation purposes. The topsoil and vegetation should be replaced over the disturbed soil to provide a source of seed and a seed bed to encourage re-growth of the species removed during construction.
- Once the construction is completed all further movement must be confined to the access tracks to allow the vegetation to re-establish over the excavated areas.

INDIRECT IMPACTS

Indirect impacts are impacts that are not a direct result of the main activity (construction of the solar facility), but are impacts still associated or resulting from the main activity. Very few indirect impacts are associated

with the establishment of the solar facility (e.g. no water will be used, no waste material or pollution will be produced through the operation of the facility).

The only indirect impact resulting from the construction and use of the facility is a loss of movement from small game and other mammals, since the property will be fenced. However, it is not considered to result in any major or significant impact on the area as a whole.

CUMULATIVE IMPACTS

In order to comprehend the cumulative impact, one has to understand to what extent the proposed activity will contribute to the cumulative loss of this vegetation type and other biodiversity features on a regional basis. Vanrhynsdorp Gannabosveld was classified as "Vulnerable", during the 2004 National Spatial Biodiversity Assessment. However, the more recent "National list of ecosystems that are threatened and in need of protection" (GN 1002, December 2011), promulgated in terms of the National Environmental Management Biodiversity Act (NEM: BA), Act 10 of 2004, de-classified the vegetation status to "Least Threatened". More than 79% of this vegetation type is still found in a relatively natural state. Thus the vegetation itself is not considered to belong to a threatened or protected ecosystem. No special habitats were encountered on site, which could sustain significant smaller ecosystems.

However, even though Vanrhynsdorp Gannabosveld has now been de-classified to a status of Least Threatened, the proposed solar site will be located within an area that has been identified as a Critical Biodiversity Area within the Matzikama Municipal Biodiversity Sector Plan (Maree & Vromans, 2010). Although it might not lead to significant loss of vegetation it might impact on its role as a viable east-west connective corridor between large areas of natural veld.

Thus the impact on the regional status of this vegetation type and associated <u>biodiversity</u> features would be <u>classified as medium</u>. However, apart from <u>possible significant corridor function loss</u>, no irreversible speciesloss, habitat-loss or associated impact can be foreseen from locating and operating the solar facility on the final proposed solar site.

THE NO-GO OPTION

During the impact assessment only the final proposed site (as described in Figure 2 and Table 1 is discussed. From the above, the "No-Go alternative" does signify biodiversity gain in that the integrity of an important ecological corridor (identified as a CBA within the Matzikama Municipal Biodiversity Sector Plan) will be protected and maintained. It will also sustain the Biodiversity Sector Plan objectives for the Municipality which states that CBA's must be managed with the objective to maintain all natural land, rehabilitate degraded areas back to natural or near natural and to manage these areas to prevent further degradation.

The site visit and desktop studies described and evaluated in this document led to the conclusion that the "No-Go" alternative may result in significant gain in regional conservation targets (not through the conservation of significant vegetation, rare & endangered species or special habitats, but through corridor conservation).

On the other hand the pressure on Eskom facilities, most of which are currently still dependant on fossil fuel electricity generation, will remain. Solar power is seemingly a much cleaner, biodiversity friendly, and more sustainable long term option for electricity production. The socio-economical gain for the area could also be significant.

QUANTIFICATION OF ENVIRONMENTAL IMPACTS

Taking all of the above discussions into account and using Van Schoor's formula for impact quantification, impacts of the following can be quantified as follows:

Please note that the Quantification of environmental impacts was based on the assumption that the footprint will be minimised and that areas not directly impacted by the location of infrastructure could remain almost natural.

NO DEVELOPMENT

The no development scenario can only take regional biodiversity into account. The site visit and desktop studies described and evaluated in this document led to the conclusion that the "No-Go" alternative may result in significant gain in regional conservation targets (not through the conservation of significant vegetation, rare & endangered species or special habitats, but through corridor conservation) and it should be considered to move the proposed final site location out of the CBA. On the other hand, national biodiversity (and even possibly global diversity) may show significant gain over time, if for instance fossil burning electricity generation could be reduced and or replaced by cleaner energy production methods. Although solar energy is presently not seen as a viable stand-alone technology for electricity production it will lighten the pressure on the fossil burning facilities of Eskom and in so doing will add to a more sustainable way of electricity production.

DEVELOPMENT WITHOUT MITIGATION

The purpose of this scenario is to illustrate, using Van Schoor's formula, the loss should development be allowed <u>without any mitigation measures</u>. It is assumed that the 20 ha will be totally developed into hard surfaces, but still in context of the regional importance of the biodiversity associated with the area.

$$S = \{(fd + int + sev + ext + loc) \times (leg + gcp + pol + ia + str) \times P\} \text{ (as adapted)}$$

$$S = \{(3 + 2 + 2 + 1 + 3) \times (1 + 1 + 1 + 1 + 1) \times 0.95\} = 52\%$$

In the above any value of 15% or less indicates an insignificant environmental impact, while any value above 15% constitutes ever increasing environmental impact.

DEVELOPMENT WITH MITIGATION

The purpose of this scenario is to illustrate, using Van Schoor's formula, the environmental gain should development be allowed with all proposed mitigation measures implemented. It is assumed that the 20 ha will be developed, but that all areas not directly impacted by infrastructure placement will remain as natural as possible.

$$S = [(fd + int + sev + ext + loc) \times (leg + gcp + pol + ia + str) \times P] \text{ (as adapted)}$$

$$S = [(3 + 2 + 2 + 1 + 3) \times (0 + 1 + 0 + 1 + 0) \times 0.95] = 20\%$$

In the above any value of 15% or less indicates an insignificant environmental impact, while any value above 15% constitutes ever increasing environmental impact.

RECOMMENDATIONS & IMPACT MINIMIZATION

The site visit and desktop studies described and evaluated in this document led to the conclusion that the "No-Go" alternative may result in <u>significant gain in regional conservation targets</u> (not through the conservation of significant vegetation, rare & endangered species or special habitats, but through corridor conservation) <u>and it</u> should be considered to move the proposed final site location out of the CBA.

It was also clear that the specific site location cannot be rejected on the grounds of:

- the significance of the specific vegetation type (which are classified as Least Threatened),
- nor due to the impact on populations of individual species (regarded as low),
- nor due to the conservation of rare & endangered species (considered not be to be significantly impacted),
- nor for the protection of protected species (of which none was encountered),
- nor due to the impact on special or sensitive habitats (none encountered).

Thus, although the placement of the solar site location is not expected to have significant impact on any single biodiversity feature, it is expected to put <u>pressure on regional conservation targets</u> (possible impediment of corridor connectivity) due to its CBA status

On the other hand, national biodiversity (and even possibly global diversity) will show significant gain over time, if for instance fossil burning electricity generation could be reduced and or replaced by cleaner energy production methods. Although solar energy is presently not seen as a viable stand-alone technology for electricity production it will lighten the pressure on the fossil burning facilities (and the need for building more) of Eskom and in so doing will add to a more sustainable way of electricity production.

Finally, when quantifying the development options, the Van Schoor's formula for impact quantification still shows a significant difference between development without and development with mitigation.

With the available information at the author's disposal it is recommended that the possibility of locating the proposed site out of the CBA must be investigated (Refer to Figure 11). If not possible, all mitigation measures described in this document is implemented and the site should be located to minimise the impact on the CBA. Furthermore, a botanist or suitably qualified ECO must be appointed during the construction phase of the project.

Biodiversity Assessment

IMPACT MINIMIZATION

GENERAL

- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must be developed by a suitably experienced Environmental Assessment Practitioner.
- A suitably qualified Environmental Control Officer must be appointed to monitor the construction
 phase of the solar plant in terms of the EMP and the Biodiversity study recommendations as well as
 any other conditions which might be required by the Department of Environmental Affairs.
- An integrated waste management system must be implemented during the construction phase.
- All rubble and rubbish (if applicable) must be collected and removed from the site to a suitable registered waste disposal site.
- All alien vegetation should be removed from the larger property.
- Adequate measures must be implemented to ensure against erosion.

SITE SPECIFIC

- Consider moving the solar site location out of the CBA corridor (Refer to Figure 11, next page).
- If the above is not possible ensure that the final placement takes the ecological process into
 consideration and will result in the least impact on the CBA corridor (e.g. placing it along the edge of
 the CBA).
- A botanist or suitably experienced ECO must be appointed to oversee the initial layout of the construction site, with the aim to minimise the impact on the CBA.
- Only existing access roads should be used for access to the terrain (solar site).
- The internal network of service roads (if needed) must be carefully planned to minimise the impact on
 the remaining natural veld on the site. The number of roads should be kept to the minimum and
 should be only two-track/ twee-spoor roads (if possible). If possible the construction of any hard
 surfaces should be minimised or avoided.
- During construction access roads and the internal road system must be clearly demarcated and access must be tightly controlled (deviations must not be allowed).
- Indiscriminate clearing of areas must be avoided, only pylon sites and sites where associated infrastructure needs to be placed may be cleared (all remaining areas to remain as natural as possible).
- All topsoil (the top 15-20 cm at all excavation sites), must be removed and stored separately for reuse for rehabilitation purposes. The topsoil and vegetation should be replaced over the disturbed soil
 to provide a source of seed and a seed bed to encourage re-growth of the species removed during
 construction.

 Once the construction is completed all further movement must be confined to the approved access and maintenance tracks to allow the vegetation to re-establish over the excavated areas.



Figure 11: A possible alternative which will not impact on the CBA (locate within the yellow rectangle) might be the following