

Philip Rosenthal

From: Philip Rosenthal [mailto:PhilipRosenthal.com]
Sent: 04 December 2013 09:04 PM
To: 'Samantha Ralston'
Subject: Augrabies Important Bird Area Boundary Demarcation
Attachments: Important Bird Area - Augrabies Falls National Park.kmz; Portion 9 of Farm 15 (Site).kmz; Augrabies National Park.kmz

Dear Samatha

Thank you for your comment. The information you sent me:

- * includes the proposed site as falling within the 'Important Bird Area';
- * lists it as 'Fully protected';
- * explains that the boundaries of the Important Bird Area were demarcated by the Augrabies National Park and the Riemvasmaak Community land combined.

Nevertheless, the proposed site on Portion 9 of Farm 15 is:

- * Not part of the National Park.
- * Has no conservation status and never has had any.
- * It is not part of the National Protected Area Expansion Strategy (indicating it is not a priority for inclusion)

Please find attached the actual approximate boundaries of the National Park in kml plus the boundaries of the proposed site to be compared with the Augrabies Important Bird Area.

It appears that the area was demarcated using an incorrect boundary line, which has also been distributed by SANParks and SANBI. I have raised the issue of this error with them and they have acknowledged in writing that it is an error, but apparently this has not yet been corrected. Open Street Maps gives the correct Augrabies National Park boundary.

The question is whether there is any reason to include this land within the Important Bird Area if it is not part of the National Park, which makes it different to the other surrounding farmland? On the land I observed considerably less bird numbers and diversity than in the Augrabies National Park or for that matter in the adjacent irrigated farmland. I assume this was because numbers and diversity increased near to water of the Orange River, the crop irrigation and ironically due to the groundwater flowing from irrigated farmland to the East into the National Park. The botanical habitat types on the farm of the proposed site are similar to much larger areas found both in and outside the National Park. The farm of the proposed site has a relatively flat topography and very few trees over 1.5 metres, thus providing fewer species safe nesting opportunities, while the National Park has numerous cliffs, ridges, steep hills, diversity of botanical habitats and considerably more trees to provide nesting opportunities. The farm currently has only wild horses on it and thus its land use would not affect the bird population.

I plan to add the Important Bird Area information to the BAR, but to also add that I believe this boundary demarcation was in error, unless you can motivate a reason for its inclusion.

Very visible birds on the proposed site are Social Weavers, which had already colonised the Solar PV test station and I expect may similarly try to colonise the proposed PV Plant if built. I plan to add a recommendation that if any destruction of social weaver nests is necessary, that it be undertaken as soon as it starts or wait until outside of their breeding season. Since the proposed PV plant does not propose to clear all vegetation or

topsoil from the site but to simply implant the PV arrays in the existing landscape, birds will be able to continue to forage on the land as they have done before the PV plant.

Yours sincerely,

Philip Rosenthal

From: Samantha Ralston [mailto:energy@birdlife.org.za]
Sent: 04 December 2013 05:09 PM
To: 'Philip Rosenthal'
Subject: RE: Comment on proposed Solar PV Energy Plant near Augrabies

Dear Philip

The shapefiles of all our IBAs can be downloaded from here:
<http://www.birdlife.org.za/conservation/iba/documentationdownloads>

For more information on the Augrabies IBA please see here:
<http://www.birdlife.org.za/conservation/iba/iba-directory/218-augrabiesfalls>

I hear understand your point about other sources of land use change in the area and we certainly do not want to single out renewable energy. BirdLife South Africa recognises the importance of increasing the proportion of energy generated from renewable energy in South Africa. We are merely flagging that solar energy (combined with other sources of habitat loss) presents a new driver of potentially rapid habitat alteration and the cumulative impacts of this must be borne in mind.

Kind regards
Sam

From: Philip Rosenthal [mailto:mail@philiprosenthal.com]
Sent: 04 December 2013 04:27 PM
To: Samantha Ralston
Subject: RE: Comment on proposed Solar PV Energy Plant near Augrabies

Dear Samantha

Please could you clarify the boundaries of this important bird area. In my understanding the habitat type is not rare or threatened but some of that adjacent to the orange river is so. The habitat change due to the solar plant will also be minimal compared with irrigated agriculture which is the dominant land use change in the area.

Philip Rosenthal

Sent from my phone +27826768966.

----- Original message -----

From: Samantha Ralston <energy@birdlife.org.za>
Date: 04/12/2013 15:47 (GMT+02:00)
To: mail@PhilipRosenthal.com
Cc: advocacy@birdlife.org.za
Subject: RE: Comment on proposed Solar PV Energy Plant near Augrabies

Dear Philip

I hope this finds you well.

BirdLife South Africa supports the sustainable development of renewable energy in South Africa. To this end we have produced guidelines to help minimise the impact on birds from solar facilities and associated infrastructure in South Africa (attached). We trust that these guidelines will be useful for this assessment, as well as any future assessments you may do for solar energy.

While the proposed solar facility is relatively small, it is located close to the Augrabies National Park, an Important Bird and Biodiversity Area. A point worth noting in the BAR. Important Bird and Biodiversity Areas are sites that have been identified as critical for the long-term survival of birds that: (1) are globally threatened, (2) have a restricted range and/or (3) are restricted to specific biomes/vegetation types. In addition, IBAs include sites that have significant populations of congregatory birds.

As the BAR suggests it is likely that birds will move out of the development area. This does not imply that that birds will not be affected; habitat loss/ alternation must be considered as birds may longer use the area. Every effort must therefore be made to reduce loss of vegetation and disturbance. While these impacts are unlikely to be significant when this project is viewed in isolation, there are a number of similar projects proposed in the area. The potential for cumulative impacts should therefore be **considered** in this assessment.

Yours sincerely

Sam Ralston

Samantha Ralston
Birds and Renewable Energy Manager



Giving Conservation Wings

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