

Philip Rosenthal

From: Coenrad Agenbach [CAgenbach@environment.gov.za]
Sent: 20 February 2012 12:28 PM
To: Nyiko Nkosi
Cc: Takalani Maswime; mail@PhilipRosenthal.com
Subject: Re: Fwd: Do we really need a bird and bat specialist study for a 20 ha Solar PV desert BAR?

Importance: High

Attachments: ATT00021.jpg



ATT00021.jpg (26 KB)

Dear Nyiko

A bat and avifauna study is not required.

Regards

Coenrad Agenbach
Control Environmental Officer (Grade B):
Environmental Impact Evaluation: Special Projects Department of
Environmental Affairs Private Bag X447 Pretoria
0001
South Africa

Telephone: + 27 12 310 3711
Fax: + 27 12 320 7539

>>> Nyiko Nkosi 2012/02/18 11:59 AM >>>

Hi Takalani and Coenrad

Please see email below and reply please?

>>> "Philip Rosenthal" <mail@PhilipRosenthal.com> 2/16/2012 10:21 AM >>>

Dear Nyko Nkosi

Thank you for acknowledging the Mulilo Augrabies Solar PV Application.

One of the requirements requested by your department in the attached letter is 'A map/layer that indicate the locations of birds and bats including roosting and foraging areas (specialist input required)' (see extract clipped below) and on page 5 of the attached .pdf. We have appointed a very well qualified specialist team which we believe is appropriate and necessary for this project (including Visual, Heritage, Paleontology, Botany, Ecology, Agricultural), but we do not believe that a specialist bird and bat study is warranted by a 20 hectare Solar PV project in a desert environment. That would involve a significant extra time and expense and we do not see how that additional information would add significant value to the environmental assessment.

What we are doing is assessing the habitat and the impacts of the loss of this 20 hectare area of habitat to all species (birds and bats included) using a botanical specialist (ground truthed) study plus added analysis from a general ecological (desktop) study of all species in the area using an ecologist who has done several studies in the same area and drawing on data from the area. But mapping of specific bird and bat roosting locations we do not believe is warranted in this instance.

Unlike wind, solar PV is not known to have a direct impact on birds or bats other than the loss of habitat. Such a requirement may be warranted for a Wind Energy Site or for a Large PV site, or even a small PV site in an area with a very high bird and bat sensitivity. But this project and location does not fulfill any of these criteria to warrant such additional specialist studies.

The reasons for not doing specialist bird and bat studies are:

- i. It is a small project (under 20 ha)
- ii. The habitat is a desert - of which this is a tiny fraction of the vast expanses of habitat of the same type as shown on the BGIS database.
- iii. Those with local knowledge of the site are not aware of anything significantly different about the ecology on this site from the surrounding area.
- iv. The technology (Solar PV) is not known to impact birds and bats apart from loss of habitat.
- v. Other small solar PV projects approved by your department do not appear to have done such bird and bat specialist studies. Is this a new requirement?
- vi. We are doing a general evaluation of the impacts of such habitat loss using specialist botanical and ecological skills.
- vii. Site visits thus far have not revealed anything warranting further investigation of bird and bat issues. If we did find anything we would do it.
- viii. The project is not planning to do any blasting (which on other projects which do have blasting would need specialist input to ensure that breeding of sensitive species is not disturbed).
- ix. The study areas area are relatively flat. The topographical variation in the study areas from which the PV site will be selected is 12 metres (from maximum to minimum) over a distance of 1.6 kilometres. There are no tall trees (maximum 3m) or rocky outcrops (maximum 1/2 metres out of ground) which might for example form safe roosting perches for bats or large raptors. The topography of the national park 1.5 kilometres away is entirely different and does include tall rocks.
- x. The study area is dry apart from disused boreholes and seasonal drainage channels which are wet only a short time after occasional rain. There are no ephemeral pans or water bodies which might act as special attractants for birds or bats.

If your department insists we do these studies, then we will do them,

but our opinion is that it would be a waste of time and money. If your department does not accept the motivation for note doing the study above and does insist that we do these additional studies, please could you notify me immediately so that we can immediately appoint such specialists to avoid delays to the project.

Please could you urgently clarify the requirements of your department on this issue.

If this is not your responsibility to make this decision, then please could you forward this email to the relevant person and copy me in on the correspondence.

Yours sincerely,

Philip Rosenthal

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Rosenthal Environmental
Tel/fax (021) 685 4500
Cell 082 6768966
Email mail@PhilipRosenthal.com
Mail: Postnet 114, P/Bag X18, Rondebosch, 7701

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