

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED LETSOAI CSP 2

SOLAR POWER PLANT:

FAUNA & FLORA SPECIALIST ASSESSMENT



**PRODUCED FOR WSP
ON BEHALF OF BIOTHERM ENERGY (PTY) LTD
BY**



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CONTENTS

1	Introduction.....	7
2	Study Approach.....	7
2.1	Scope of Study.....	7
2.2	Assessment Approach & Philosophy.....	8
2.3	Relevant Aspects of the Development.....	10
2.4	Limitations & Assumptions.....	11
3	Methodology.....	12
3.1	Data Sourcing and Review.....	12
3.2	Site Visit.....	13
3.3	Sensitivity Mapping & Assessment.....	14
4	Baseline Description of the Affected Environment.....	15
4.1	Broad-Scale Vegetation Patterns.....	15
4.2	Listed and Protected Plant Species.....	16
4.3	Alien Plant Species Abundance.....	17
4.4	Critical Biodiversity Areas & Broad-Scale Processes.....	17
4.5	Site Description.....	20
4.6	Faunal Communities.....	25
5	Site sensitivity Assessment.....	27
6	Impacts and Issues Identification.....	29
7	Impact Assessment.....	31
7.1	Planning & Construction Phase Impacts.....	31
7.2	Operational Phase Impacts.....	34
7.3	Decommissioning Phase Impacts.....	35
7.4	Cumulative Impacts.....	37
8	Conclusions & Recommendations.....	45
9	Literature Cited.....	47
10	Annex 1. List of Plants.....	48
11	Annex 1. List of Mammals.....	53
12	Annex 2. List of Reptiles.....	56
13	Annex 3. List of Amphibians.....	58

NEMA 2014 CHECKLIST

Section		NEMA 2014 Regulations for Specialist Studies	Position in report (pg.)	check
1	1	A specialist report prepared in terms of these Regulations must contain—		
	(a)	details of-		
		(i) the specialist who prepared the report; and	See Main Report	
		(ii) the expertise of that specialist to compile a specialist report including a curriculum vitae;	See Main Report	
	(b)	a declaration that the person is independent in a form as may be specified by the competent authority;		✓
	(c)	an indication of the scope of, and the purpose for which, the report was prepared;	4	✓
	(d)	a description of the methodology adopted in preparing the report or carrying out the specialised process;	5-6	✓
	(e)	a description of any assumptions made and any uncertainties or gaps in knowledge;	6	✓
	(f)	a description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment;	10-26	✓
	(g)	recommendations in respect of any mitigation measures that should be considered by the applicant and the competent authority;	26-34	✓
	(h)	a description of any consultation process that was undertaken during the course of carrying out the specialist report;	See main EIA report	✓
	(i)	a summary and copies of any comments that were received during any consultation process; and	See main EIA report	✓
	(j)	any other information requested by the competent authority.		
	2	Where a proposed development and the geographical area within which it is located has been subjected to a pre-assessment using a spatial development tool, and the output of the pre-assessment in the form of a site specific development protocol has been adopted in the prescribed manner, the content of a specialist report may be determined by the adopted site specific development protocol applicable to the specific proposed development in the specific geographical area it is proposed in.	N/A	✓

PROFESSIONAL PROFILE OF CONSULTANT:

Simon Todd Consulting has extensive experience in the assessment of renewable energy developments, having provided ecological assessments for more than 80 different renewable energy developments. This includes a large number of developments in the immediate vicinity of the current site as well as in the broader Northern Cape Province. Simon Todd is a recognised ecological expert and is a past chairman and current executive committee member of the Arid-Zone Ecology Forum and has 18 years' experience working throughout the country. Simon Todd is registered with the South African Council for Natural Scientific Professions (No. 400425/11).

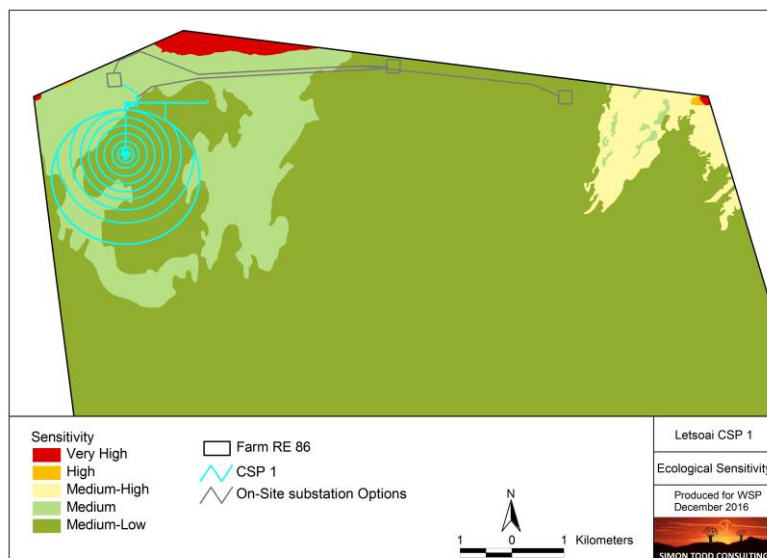
Recent experience and relevant projects in the vicinity of the current site include specialist fauna and flora studies for the following developments in the area:

- 75MW Solar PV Plant on Suurwater 62, Aggeneys. Cape EAPRac. 2013.
- Walkthrough of Biotherm Energy – Aggeneys Solar Farm. Savannah Environmental 2015.
- Gamsberg Zinc Mine - Concentrator Plant And Associated Infrastructure. ERM 2013.
- Pella Water Board – Pipeline to Aggeneys. ERM. 2012.
- Sol Invictus 1-4 PV Plants & Grid Connection, Aggeneys. Savannah Environmental. 2016.
- Konkoonsies Solar PV Plant. EScience Associates. 2012.
- Konkoonsies Solar II Grid Connection. Savannah Environmental 2015.
- Konkoonsies II walk- through. Savananh Environmental 2015.
- Putsberg Open Cast Mine, Pofadder. Ecopartners. 2013.

EXECUTIVE SUMMARY

BioTherm Energy (Pty) Ltd is proposing to develop the Letsoai CSP 2 solar tower power plant on Hartebeest Vlei 86, situated approximately 18 km south of Aggeneys in the Northern Cape Province. The plant would occupy an area of approximately 774ha and would also include a connection to an on-site substation. This terrestrial fauna and flora specialist study details the ecological characteristics of the site and provides an assessment of the likely ecological impacts associated with the development of the CSP Plant. Impacts are assessed for the preconstruction, construction, operation, and decommissioning phases of the development. A site visit and a desktop review of the available ecological information for the area were used to identify and characterize the ecological features of the site and develop an ecological sensitivity map for the site, which is depicted below.

The CSP footprint is restricted to the Bushmanland Arid Grassland vegetation type, which is one of the most extensive vegetation types in South Africa. The site itself consists of an open plain with vegetation typical of Bushmanland Arid Grassland dominated by arid bunchgrasses such as *Stipagrostis ciliata*, *S.obtusa*, *S.brevifolia*, *S.anomala*, and *Enneapogon scaber*, with occasional areas with more shrubs such as *Rhigozum trichotomum*, *Lycium cinereum* and *Eriocephalus spinescens*. The abundance of listed or protected species within the study area is low and apart from a low density of *Hoodia gordonii*, no other significant species were observed.



The development footprint is restricted to the open plains of the study site, which are considered to be medium to medium-low sensitivity. Although there are no features of high sensitivity within the site, the areas of deeper soils are considered somewhat more sensitive than the surrounding areas of shallow soils due to the greater risk of wind erosion in these areas as well as their likely greater significance for fauna.

The major impact associated with the development would be the near-total loss of habitat within the 700ha plus development footprint. Consequently, options for avoidance are minimal and all vegetation within the development area will likely be lost. Although this is a potentially significant impact in terms of direct habitat loss, the diversity of the affected area is low and the affected habitats are widely available in the area. As such, the significance of this impact is moderated by the low sensitivity

of affected area and would be of local significance only and considered to be of Medium significance after mitigation.

In terms of the water supply pipeline options, Option 1 traverses the least sensitive areas and is identified as the preferred option. Option 2 is somewhat more sensitive overall as it traverses the Koa River valley, where the loose dune sands are vulnerable to erosion. The route is however adjacent to the access road through this area which would reduce the impact to some extent. As such this is considered an acceptable but less preferred option. Option 3 traverses several areas with significant populations of species of conservation concern. In addition, mitigating impacts through the final section of the route along the gorge to the Orange River would be problematic. This option would generate a significantly higher impact than the other two options and is not considered a favourable option.

The potential for cumulative impacts is a concern associated with the development given the large number of proposed renewable energy projects in the wider area. However, even if all current projects are built it is estimated that this would amount to 0.66% of the landscape and this is concentrated within the Bushmanland Arid Grassland vegetation type which is very widespread. Although the footprint of the Letsoai CSP 2 footprint is relatively high, the greater Letsoai and Enamandla projects are concentrated within a relatively small area and their overall impact would be less than a more dispersed configuration. The overall cumulative impact of development in the area is still considered relatively low and a significant impact on biodiversity is not likely as the more sensitive elements of the landscape are currently outside of the development footprint of the proposed PV and wind farms.

Due to the arid nature of the area, it is important that the mobility of fauna in the area is not compromised, as many arid-adapted fauna respond to the unpredictability of these systems by moving extensively across the landscape. The connectivity of the landscape should be maintained by making provision for some undeveloped corridors between the proposed facilities to facilitate movement through this area. There are however no identified corridors within the site that are currently likely to be important for fauna.

Overall and with the suggested mitigation measures implemented, the impact of the Letsoai CSP 2 development would be of low magnitude and of local significance only. As such, the development is considered acceptable from a terrestrial ecological perspective.

Summary assessment of the impacts associated with the Letsoai CSP 2 plant, for the different phases of the development, before and after mitigation.

Phase & Impact	Before Mitigation	After Mitigation
Planning & Construction Phase		
Impacts on vegetation and protected plant species:	Medium	Medium

Faunal impacts due to construction activities	Medium	Low
Areas disturbed during construction will be vulnerable to wind and water erosion.	Medium	Low
Operational Phase		
Faunal Impacts due to Operation	Medium	Low
Alien invasive plants impacts	Medium	Low
Following construction, disturbed areas will remain vulnerable to erosion	Medium	Low
Reduced ability to meet conservation targets	Medium	Low
Decommissioning Phase		
Following decommissioning, the site will remain vulnerable to erosion	Medium	Low
Impacts on fauna due to decommissioning	Low	Low
Following decommissioning, the site will remain vulnerable to alien plant invasion	Medium	Low
Cumulative Impacts		
Cumulative habitat loss and impacts on broad-scale ecological processes and loss of landscape connectivity	Medium	Low

1 INTRODUCTION

BioTherm Energy (Pty) Ltd is proposing to develop the Letsoai CSP 2 solar tower power plant on Hartebeest Vlei 86, situated approximately 18 km south of Aggeneys in the Northern Cape Province. The plant would occupy an area of approximately 774ha and would also include a connection to an on-site substation, as well as a pipeline to Black Mountain Mine or the Orange River. The power generated would be evacuated to the Eskom network via a 400kV overhead power line to the Aggeneys substation, which is subject to its' own environmental authorisation process and is not considered here.

WSP are conducting the required environmental authorisation process for the Letsoai CSP 2 development and have appointed Simon Todd Consulting to provide the terrestrial fauna and flora input for the development. The scoping report for the development has been accepted by DEA and the study is now in the EIA phase. As such, this terrestrial fauna and flora specialist study details the ecological characteristics of the site and provides an assessment of the likely ecological impacts associated with the development of the CSP Plant. Impacts are assessed for the preconstruction, construction, operation, and decommissioning phases of the development. A variety of avoidance and mitigation measures associated with each identified impact are recommended to reduce the likely impact of the development, which should be included in the EMPr for the development.

2 STUDY APPROACH

2.1 SCOPE OF STUDY

The scope of the study includes the following activities

- A description of the environment that may be affected by the activity and the manner in which the environment may be affected by the proposed project.
- A description and evaluation of environmental issues and potential impacts (including assessment of direct, indirect and cumulative impacts) that have been identified.
- A statement regarding the potential significance of the identified issues based on the evaluation of the issues/impacts.
- An indication of the methodology used in determining the significance of potential environmental impacts.
- An assessment of the significance of direct indirect and cumulative impacts of the development.
- A description and comparative assessment of all alternatives including cumulative impacts
- Recommendations regarding practical mitigation measures for potentially significant

impacts, for inclusion in the environmental management programme (empr).

- An indication of the extent to which the issue could be addressed by the adoption of mitigation measures.
- A description of any assumptions uncertainties and gaps in knowledge.
- An environmental impact statement which contains :
 - A summary of the key findings of the environmental impact assessment;
 - An assessment of the positive and negative implications of the proposed activity;
 - A comparative assessment of the positive and negative implications of identified alternatives.

2.2 ASSESSMENT APPROACH & PHILOSOPHY

The assessment will be conducted according to the EIA Regulations, published by the Department of Environmental Affairs (2014) as well as within the best-practice guidelines and principles for biodiversity assessment as outlined by Brownlie (2005) and De Villiers et al. (2005).

This includes adherence to the following broad principles:

- That a precautionary and risk-averse approach be adopted towards projects which may result in substantial detrimental impacts on biodiversity and ecosystems, especially the irreversible loss of habitat and ecological functioning in threatened ecosystems or designated sensitive areas: i.e. Critical Biodiversity Areas (as identified by systematic conservation plans, Biodiversity Sector Plans or Bioregional Plans) and Freshwater Ecosystem Priority Areas.
- Demonstrate how the proponent intends complying with the principles contained in section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA), which, amongst other things, indicates that environmental management should:
 - In order of priority aim to: avoid, minimise or remedy disturbance of ecosystems and loss of biodiversity;
 - Avoid degradation of the environment;
 - Avoid jeopardising ecosystem integrity;
 - Pursue the best practicable environmental option by means of integrated environmental management;
 - Protect the environment as the people's common heritage;
 - Control and minimise environmental damage; and
 - Pay specific attention to management and planning procedures pertaining to sensitive, vulnerable, highly dynamic or stressed ecosystems.

These principles serve as guidelines for all decision-making concerning matters that may affect the environment. As such, it is incumbent upon the proponent to show how proposed activities would comply with these principles and thereby contribute towards the achievement of sustainable development as defined by the NEMA.

In order to adhere to the above principles and best-practice guidelines, the following approach forms the basis for the study approach and assessment philosophy:

The study will include data searches, desktop studies, site walkovers / field survey of the property and baseline data collection, describing:

- A description of the broad ecological characteristics of the site and its surrounds in terms of any mapped spatial components of ecological processes and/or patchiness, patch size, relative isolation of patches, connectivity, corridors, disturbance regimes, ecotones, buffering, viability, etc.

In terms of **pattern**, the following will be identified or described:

Community and ecosystem level

- The main vegetation type, its aerial extent and interaction with neighbouring types, soils or topography;
- Threatened or vulnerable ecosystems (*cf. SA vegetation map/National Spatial Biodiversity Assessment, fine-scale systematic conservation plans, etc*).

Species level

- Species of conservation concern (SCC) (giving location if possible using GPS)
- The viability of an estimated population size of the SCC that are present (include the degree of confidence in prediction based on availability of information and specialist knowledge, i.e. High=70-100% confident, Medium 40-70% confident, low 0-40% confident)
- The likelihood of other RDB species, or species of conservation concern, occurring in the vicinity (include degree of confidence).

Fauna

- Describe and assess the terrestrial fauna present in the area that will be affected by the proposed development.
- Conduct a faunal assessment that can be integrated into the ecological study.
- Describe the existing impacts of current land use as they affect the fauna.
- Clarify species of special concern (SSC) and that are known to be:
 - endemic to the region;
 - that are considered to be of conservational concern;
 - that are in commercial trade (CITES listed species);

- or, are of cultural significance.
- Provide monitoring requirements as input into the Environmental Management Programme (EMPr) for faunal related issues.

Other pattern issues

- Any significant landscape features or rare or important vegetation associations such as seasonal wetlands, alluvium, seeps, quartz patches or salt marshes in the vicinity.
- The extent of alien plant cover of the site, and whether the infestation is the result of prior soil disturbance such as ploughing or quarrying (alien cover resulting from disturbance is generally more difficult to restore than infestation of undisturbed sites).
- The condition of the site in terms of current or previous land uses.

In terms of **process**, the following will be identified or described:

- The key ecological “drivers” of ecosystems on the site and in the vicinity, such as fire.
- Any mapped spatial component of an ecological process that may occur at the site or in its vicinity (i.e. *corridors* such as watercourses, upland-lowland gradients, migration routes, coastal linkages or inland-trending dunes, and *vegetation boundaries* such as edaphic interfaces, upland-lowland interfaces or biome boundaries)
- Any possible changes in key processes, e.g. increased fire frequency or drainage/artificial recharge of aquatic systems.
- Furthermore, any further studies that may be required during or after the EIA process will be outlined.
- All relevant legislation, permits and standards that would apply to the development will be identified.
- The opportunities and constraints for development will be described and shown graphically on an aerial photograph, satellite image or map delineated at an appropriate level of spatial accuracy.

2.3 RELEVANT ASPECTS OF THE DEVELOPMENT

The proposed Lesoai CSP 2 facility will comprise the following components:

- A CSP Power Tower facility utilising a heat transfer fluid or molten salt and a Heliostat Solar Field;
- A steam turbine and generator, and auxiliary fossil fuel boilers;
- An air cooled condenser;
- The medium voltage collector system will comprise of cables (1kV up to and including 33kV) that will be run underground, except where a technical assessment suggest that

overhead lines are applicable, in the facility connecting the facility to the onsite Substation

- An onsite 132/400kV Substation, with the transformers for voltage step up from medium voltage to high voltage. Substation will occupy an area of 150m x 150m;
- Powerlines of up to and including 132kV is proposed and will run to the onsite substation;
- A water pipeline (50km in length) extending from the Orange River or the existing storage reservoir at Black Mountain Mine, raw water storage reservoir/tanks and evaporation ponds;
- Hot and Cold Molten Salt Storage Tanks;
- A water treatment plant, sewage disposal facility and septic tanks;
- A laydown area for the temporary storage of materials during the construction activities;
- Access roads and internal roads;
- Construction of a car park and fencing; and
- Administration, control and warehouse buildings

2.4 LIMITATIONS & ASSUMPTIONS

The major potential limitation associated with the sampling approach is the narrow temporal window of sampling. Ideally, a site should be visited several times during different seasons to ensure that the full complement of plant and animal species present are captured. However, this is rarely possible due to time and cost constraints and therefore, the representivity of the species sampled at the time of the site visit should be critically evaluated.

The main site visit for the current study took place in April 2016 which is usually the end of the wet season in the area. The wet season had however been relatively poor and it was relatively dry over most parts of the site. There had however been some rains preceding the site visit and some parts of the site, especially areas of deeper sands were relatively wet with a high abundance of annuals and geophytes. Even within the drier parts of the site the shrubs and grasses present were green or had flowered and could be identified. As a result, the results of the site visit are considered reliable and additional fieldwork at the site would be unlikely to change the assessed sensitivity of the site. The desktop study imposes some limitations on the study as the available maps and databases do not have a high resolution and many areas have not been well sampled in the past. As a result, these databases may underestimate the diversity of the site. This is to some extent countered in the current study by previous experience of the specialist in the immediate area and knowledge of the nature and distribution of sensitive features in the area.

The lists of amphibians, reptiles and mammals for the site are based on those observed at the site as well as those likely to occur in the area based on their distribution and habitat

preferences. This represents a sufficiently conservative and cautious approach which takes the study limitations into account.

3 METHODOLOGY

3.1 DATA SOURCING AND REVIEW

Data sources from the literature consulted and used where necessary in the study includes the following:

Vegetation:

- Vegetation types and their conservation status were extracted from the South African National Vegetation Map (Mucina and Rutherford 2006) as well as the National List of Threatened Ecosystems (2011), where relevant.
- Critical Biodiversity Areas for the site and surroundings were extracted from the Namakwa District Biodiversity Sector Plan (Desmet & Marsh 2008).
- Information on plant and animal species recorded for the Quarter Degree Squares (QDS) 2918 was extracted from the SABIF/SIBIS database hosted by SANBI. This is a considerably larger area than the study area, but this is necessary to ensure a conservative approach as well as counter the fact that the site itself has probably not been well sampled in the past.
- The IUCN conservation status (Figure 1) of the species in the list was also extracted from the database and is based on the Threatened Species Programme, Red List of South African Plants (2013).
- Freshwater and wetland information was extracted from the National Freshwater Ecosystem Priority Areas assessment, NFEPA (Nel et al. 2011). This includes rivers, wetlands and catchments defined under the study.
- Important catchments and protected areas expansion areas were extracted from the National Protected Areas Expansion Strategy 2008 (NPAES).

Fauna:

- Lists of mammals, reptiles and amphibians which are likely to occur at the site were derived based on distribution records from the literature and the ADU databases <http://vmus.adu.org.za>.
- Literature consulted includes Branch (1988) and Alexander and Marais (2007) for reptiles, Du Preez and Carruthers (2009) for amphibians, Friedmann and Daly (2004) and Skinner and Chimimba (2005) for mammals.
- The faunal species lists provided are based on species which are known to occur in the broad geographical area, as well as a preliminary assessment of the availability and quality of suitable habitat at the site.

- The conservation status of each species is also listed, based on the IUCN Red List Categories and Criteria 2016 (See Figure 1) and where species have not been assessed under these criteria, the CITES status is reported where possible. These lists are adequate for mammals and amphibians, the majority of which have been assessed, however the majority of reptiles have not been assessed and therefore, it is not adequate to assess the potential impact of the development on reptiles, based on those with a listed conservation status alone. To address this shortcoming, the distribution of reptiles was also taken into account such that any narrow endemics or species with highly specialized habitat requirements occurring at the site were noted.

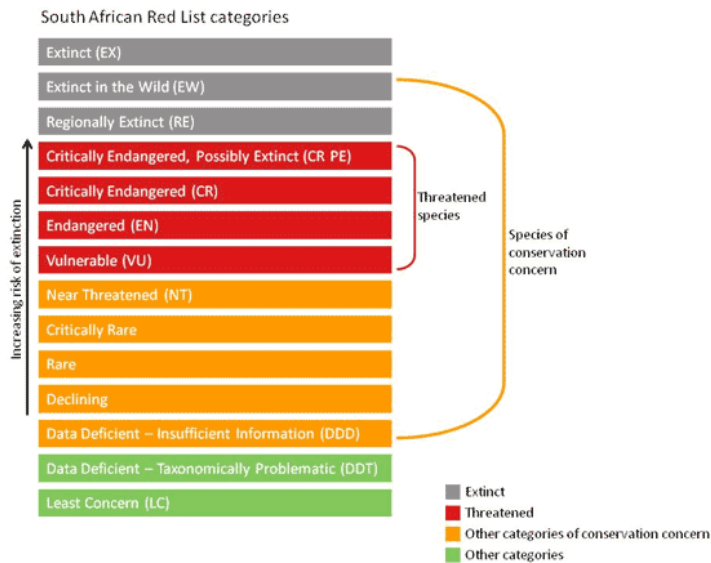


Figure 1. Schematic representation of the South African Red List categories. Taken from <http://redlist.sanbi.org/redcat.php>

3.2 SITE VISIT

The site was visited on 1st and 2nd of April 2016. During the site visit, the different biodiversity features, habitat, and landscape units present at the site were identified and mapped in the field. Specific features visible on the satellite imagery of the site were also marked for field inspection and were verified and assessed during the site visit. This included features such as any pans and rocky outcrops that were not visible from the access roads of the site and might have otherwise been missed. Walk-through-surveys were conducted within representative areas across the different habitats units identified and all plant and animal species observed were recorded. Active searches for reptiles and amphibians were also conducted within habitats likely to harbour or be important for such species. The presence of sensitive habitats such as wetlands or pans and unique edaphic environments such as rocky outcrops or quartz patches were noted in the field if present and recorded on a GPS and mapped onto satellite imagery of the site. Apart from the above site visit, the area has been visited by the consultant on multiple

occasions in the past, especially the water supply pipelines which lie within corridors that were previously assessed for other developments.

3.3 SENSITIVITY MAPPING & ASSESSMENT

An ecological sensitivity map of the site was produced by integrating the information collected on-site with the available ecological and biodiversity information available in the literature and various spatial databases. This includes delineating the different habitat units identified in the field and assigning sensitivity values to the units based on their ecological properties, conservation value and the potential or observed presence of species of conservation concern. The purpose of this map is to provide a guide to development at the site and ensure that areas that are intrinsically sensitive or vulnerable to disturbance can be avoided as much as possible. In addition it also provides a reference against which the impacts of the development can be evaluated.

The ecological sensitivity of the different units identified in the mapping procedure for the broad-scale sensitivity map was rated according to the following scale:

- **Low** – Areas of natural or transformed habitat with a low sensitivity where there is likely to be a negligible impact on ecological processes and terrestrial biodiversity. Most types of development can proceed within these areas with little ecological impact.
- **Medium**- Areas of natural or previously transformed land where the impacts are likely to be largely local and the risk of secondary impact such as erosion low. These areas usually comprise the bulk of habitats within an area. Development within these areas can proceed with relatively little ecological impact provided that appropriate mitigation measures are taken.
- **High** – Areas of natural or transformed land where a high impact may occur due to the high biodiversity value, sensitivity or important ecological role of the area. These areas may contain or be important habitat for faunal species or provide important ecological services such as water flow regulation or forage provision. Development within these areas is generally undesirable and should proceed with caution as additional specific mitigation and avoidance is usually required to reduce impacts within these areas to acceptable levels. High sensitivity areas are also usually more sensitive to cumulative impact and the footprint within these areas should be kept low.
- **Very High** – Critical and unique habitats that serve as habitat for rare/endangered species or perform critical ecological roles. These areas are essentially no-go areas from a developmental perspective and should be avoided. However, in case of linear features such as drainage lines, it may be necessary for access roads and other infrastructure to traverse such features. However no infrastructure should be located within such areas and other disturbance should be minimized. Excessive disturbance or impact to such areas may be considered to constitute a fatal flaw of the development and as such should be avoided and minimized as much as possible.

In some situations, areas were also classified between the above categories, such as Medium-High, where it was deemed that an area did not fit well into a certain category but rather fell most appropriately between two sensitivity categories. However, it is important to note that there are no sensitivities that are identified as “Medium to High” or similar ranged categories because this adds uncertainty to the mapping as it is not clear if an area falls at the bottom or top of such a range.

4 BASELINE DESCRIPTION OF THE AFFECTED ENVIRONMENT

4.1 BROAD-SCALE VEGETATION PATTERNS

According to the national vegetation map (Mucina & Rutherford 2006), (Figure 2) the Letsoai CSP 2 site is restricted to the Bushmanland Arid Grassland vegetation type. The only other vegetation type in the immediate vicinity is Bushmanland Inselberg Shrubland which is associated with the rocky hills north of the development area. The pipeline options traverse a range of additional vegetation types including Bushmanland Inselberg Shrubland, Eastern Gariep Rocky Desert and Eastern Gariep Plains Desert.

Bushmanland Arid Grassland vegetation type is an extensive vegetation type and is the second most extensive vegetation type in South Africa and occupies an area of 45 478 km². It extends from the study area around Aggeneys in the east to Prieska in the west. It is associated largely with red-yellow apedal (without structure), freely drained soils, with a high base status and mostly less than 300mm deep. Due the arid nature of the unit which receives between 70 and 200 mm annual rainfall, it has not been significantly impacted by intensive agriculture and more than 99% of the original extent of the vegetation type is still intact. Mucina & Rutherford (2006) list 6 endemic species for the vegetation type which is a relatively low number given the extensive nature of the vegetation type.

Bushmanland Inselberg Shrubland is associated with the hills and inselbergs in northern Bushmanland in the Aggeneys and Pofadder areas at altitudes ranging from 600 to 1120m. It consists of fairly azonal vegetation - shrubland with both succulent (*Aizoaceae*, *Asphodelaceae*, *Crassulaceae*, *Didiereaceae*, *Euphorbiaceae*, *Zygophyllaceae*) as well as nonsucculent (mainly *Asteraceae*) elements, with sparse grassy undergrowth (*Aristida*, *Eragrostis*, *Stipagrostis*) on steep slopes. The geology consists of inselbergs of high-grade metamorphic rocks on a broad alluvial plain. This vegetation type is threatened by mining (although not immediately) and has a target of 34%. None of it is statutorily conserved (Mucina & Rutherford 2006). In general this is considered to be a sensitive vegetation and habitat type as the diversity is high and it contains a high abundance of listed and endemic plant species. Development within these areas should be reduced as much as possible and under the layouts assessed, there are no areas of Bushmanland Inselberg Shrubland within the development footprint, although some components such as the pipeline options are close.

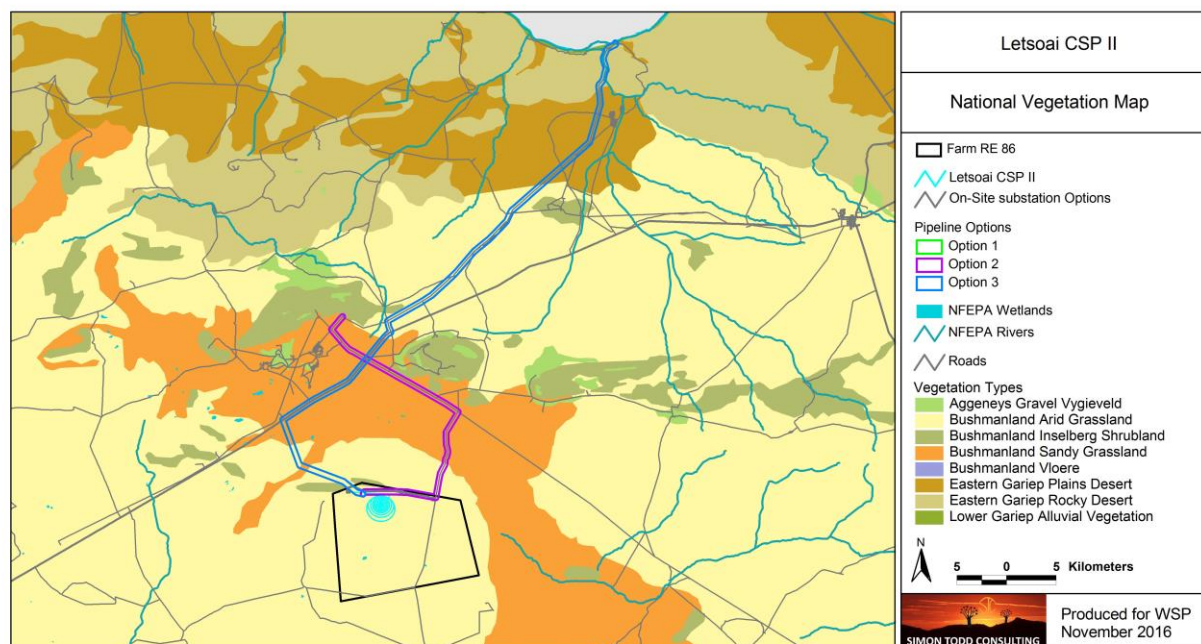


Figure 2. Broad-scale overview of the vegetation in and around the Letsoai CSP 2 site. The vegetation map is an extract of the national vegetation map as produced by Mucina & Rutherford (2006), and also includes rivers and wetlands delineated by the National Freshwater Ecosystem Priority Areas assessment (Nel et al. 2011).

4.2 LISTED AND PROTECTED PLANT SPECIES

According to the SANBI SIBIS database, 309 indigenous plant species have been recorded from the quarter degree squares 2918 AB, BA, AD and BC. This includes 11 species of conservation concern as listed below in Table 1. Only *Hoodia gordonii* can be confirmed present at the site and it is not likely that any of the other listed species are present at the site or within the development footprint of the CSP and PV facilities. There are some *Boscia albitrunca* trees present on the hills of the area, which is a nationally protected species but would not be affected by the development. There are also some species protected under the Northern Cape Nature Conservation Act of 2009, which are present in the area including *Boscia foetida* subsp. *foetida* and all species within the *Mesembryanthemaceae*, *Euphorbiaceae*, *Oxalidaceae*, *Iridaceae* and all species within the genera *Nemesia* and *Jamesbrittenia*.

Table 1. Listed species known from the broad area around the site. Only *Hoodia gordonii* can be confirmed present.

Family	Species	Status
CRASSULACEAE	<i>Crassula decumbens</i> var. <i>brachyphylla</i>	NT
MESEMBRYANTHEMACEAE	<i>Conophytum limpidum</i>	NT
CRASSULACEAE	<i>Crassula exilis</i> subsp. <i>exilis</i>	Rare

FABACEAE	<i>Crotalaria pearsonii</i>	Rare
HYACINTHACEAE	<i>Lachenalia polypodantha</i>	Rare
MESEMBRYANTHEMACEAE	<i>Conophytum tantillum subsp. eenkokerense</i>	Rare
OXALIDACEAE	<i>Oxalis inconspicua</i>	Rare
ASTERACEAE	<i>Othonna euphorbioides</i>	Thr*
HYACINTHACEAE	<i>Daubinya namaquensis</i>	Thr*
MESEMBRYANTHEMACEAE	<i>Cheiridopsis rostrata</i>	VU
APOCYNACEAE	<i>Hoodia gordonii</i>	DDD
AMARYLLIDACEAE	<i>Brunsvigia namaquana</i>	DDT
ASTERACEAE	<i>Senecio glutinarius</i>	DDT
MESEMBRYANTHEMACEAE	<i>Drosanthemum breve</i>	DDT
AMARYLLIDACEAE	<i>Boophone disticha</i>	Declining

4.3 ALIEN PLANT SPECIES ABUNDANCE

Alien species abundance at the site is generally low, which can be ascribed to the very arid nature of the area. However, with disturbance and increased runoff from the facility, alien species may become more prevalent. The most conspicuous alien on the site is *Prosopis glandulosa* which has been planted to provide shade for livestock, but it has not spread and is not currently invading the site. The only other alien observed was *Salsola kali* which was present near to some of the watering points. It was however relatively dry at the time of sampling and additional species are likely to appear after rains. Overall, the site can currently be considered very lightly to free of alien plant species and has not been significantly impacted by aliens in any way.

4.4 CRITICAL BIODIVERSITY AREAS & BROAD-SCALE PROCESSES

The site falls within the planning domain of the Namakwa Biodiversity Sector Plan (Desmet & Marsh 2008). However, this map has been replaced by the Northern Cape Conservation Plan which will be released in early 2017 (Oosthuysen & Holness, 2016). The Northern Cape Conservation Plan defines CBAs for the whole Northern Cape. In terms of this map, the CSP itself lies within an ecological support area (Figure 3). The extent of the ESA is large and the development of the CSP plant would not significantly compromise the overall functioning of the ESA. However, there a number of developments associated with the Enamandla and Letsoai facilities and cumulative impacts may be more significant. Several sections of the pipeline corridors within CBA 2 areas, with a small section of the Pipeline Option 3 within a CBA 1. This area can be confirmed sensitive with the confirmed presence of several species of conservation concern. Within the CBA 2 areas, Option 1 and Option 3 traverse the Black Mountain Conservation area northwest of the site. This area is not considered highly sensitive as there are no specific biodiversity features of significance in this area and the CBA relates to the existing conservation status of the area, which would not be significantly compromised by an underground pipeline. The area towards the Black Mountain Storage Reservoir is however

considered sensitive as there are areas of quartz on the plains on the approach to the reservoir which contain species of concern.

The site falls within a NPAES focus area, meaning that the area has been identified as a large currently intact area which has high biodiversity potential and is not currently well represented within the existing protected area network. The major concern in this regard is the availability of other similar habitat in the area. While the broader landscape contains several features and vegetation types of concern, these are outside of the study area. The typical Bushmanland grassy plains habitat within the site is very widely available in the area and the development of the site would not be likely to affect the availability of this habitat in the broader area. Therefore it is not likely that the development of the sites would significantly affect the Focus Area or the ability to meet conservation targets for the affected habitat types.

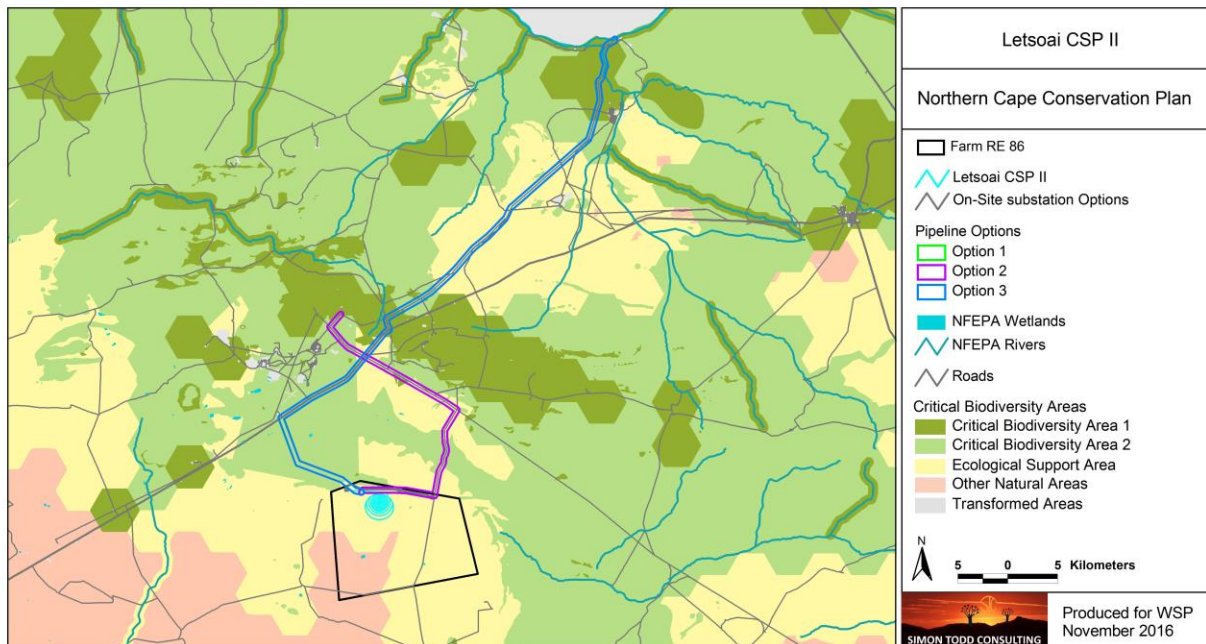


Figure 4. Critical Biodiversity Areas map of the area around the Letsoai CSP 2 site. The whole CSP is within an Ecological Support Area, while large parts of the pipeline are within CBAs.

4.5 CUMULATIVE IMPACT

As mentioned above, the potential for cumulative impacts from renewable energy development in the area is a potential concern in the area given the large number of different renewable energy developments in the area. Although there are currently few preferred bidders in the area, the projects are concentrated around the Aggeneys area and in the longer term a node of development is developing in this area (Figure 5). The total estimated direct footprint of the existing projects is estimated at around 800ha, with the proposed Letsoai and Enamandla projects adding approximately 2500ha to this. In context, this is within an area of approximately 5000 square kilometers giving an impact of 0.66% of this area, which is not a significant direct

impact at the landscape scale. Although this tends to be concentrated on the open plains habitat, mostly within the Bushmanland Arid Grassland vegetation type, this does not significantly increase the potential for high cumulative impact on specific habitats. Bushmanland Arid Grassland is one of the most extensive vegetation types in South Africa and the loss of 3000ha of this vegetation type is not significant either locally or regionally and the as mentioned already, the more sensitive elements of the landscape are currently outside of the development footprint.

In addition, not all of the authorized projects will ever be built under the REIPPP and ultimately, it is highly likely that the total extent of habitat lost to renewable energy development will remain relatively low at the landscape level. The contribution of the current project, which can be estimated at approximately 774ha, to cumulative habitat loss in the area would be relatively high based on the extent of the development, but the significance of this would be relatively low. This is because although the Letsoai and Enamandla projects would potentially have a large footprint should they all be built, they are adjacent to one another within a concentrated area and as such their impact would be lower than if they were dispersed more widely. In addition, the potential for indirect impact from noise and other disturbance factors is relatively low compared to the wind farms in the area which despite having a relatively low footprint, may generate indirect impacts on fauna through noise and vibration.

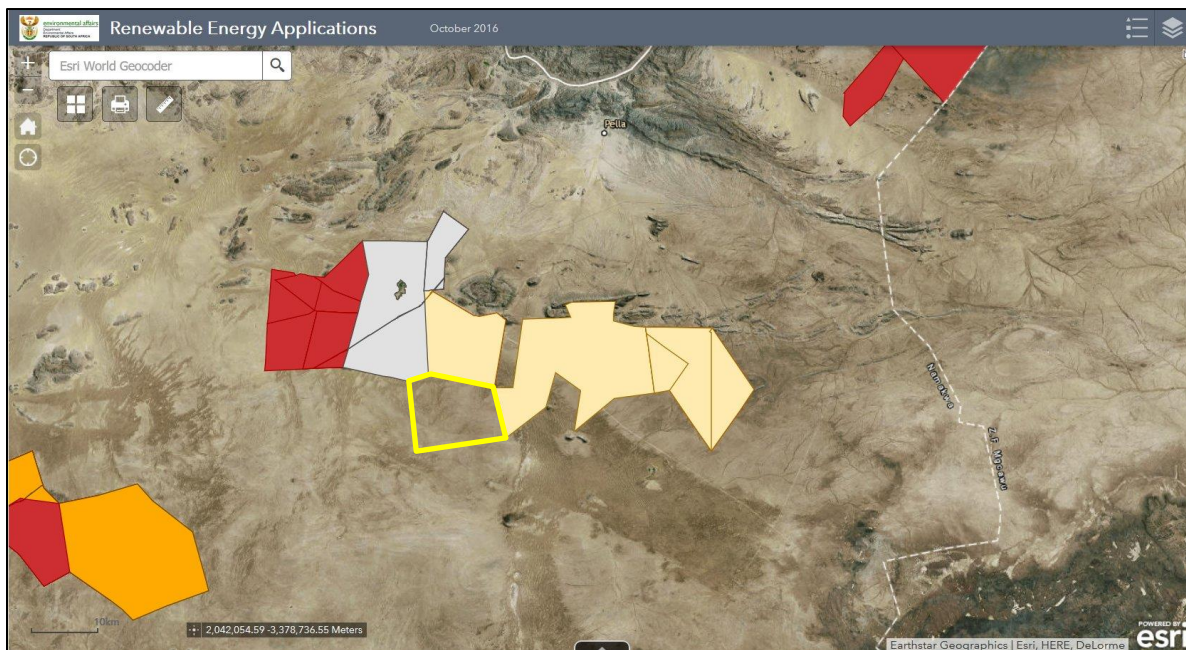


Figure 5. Map of DEA-registered renewable energy applications as at October 2016, showing the location of the Letsoai and Enamandla CSP and PV projects site in yellow outline. Red are cadastral units with solar projects and the yellow are wind energy facilities. The grey polygons are unspecified technologies, but are usually grid connections for renewable energy plants. Available at: <https://dea.maps.arcgis.com/apps/webappviewer/index.html?id=b8452ef22aeb4522953f1fb10e6dc79e>

Table 2. Other renewable energy projects in the vicinity (within 30km) of the Letsoai site and the similarity of the affected area to the Letsoai site and the estimated potential contribution of the project to cumulative impact in the area.

Project	Type	Output	Projected Footprint	Similarity to Letsoai site	Potential Contribution to Cumulative Impact
Existing Developments					
Namies Wind Farm	Wind	220MW	150ha	High	Medium-Low
Poortjies Wind Farm	Wind	140MW	100ha	High	Medium-Low
Korana Wind Farm	Wind	140MW	100ha	High	Medium-Low
Aroams PV	Solar	70MW	200ha	Moderate	Medium-Low
Boesmanland Solar Farm	Solar	75MW	200ha	Moderate	Medium-Low
Black Mountain PV	Solar	19MW	40ha	Moderate	Low
Current Proposed					
Letsoai CSP 1	Solar	200MW	774ha		Medium
Letsoai CSP 2	Solar	200MW	774ha	High	Medium
Enamandla PV 1-5	Solar	5 x 75MW	1000ha	High	Medium
Totals		1439MW	3338ha		

4.6 SITE DESCRIPTION

Letsoai CSP 2

The Letsoai CSP 2 site is located on an extensive open plain bounded in the north by some low ridges. The open plains are typical of the area and vary from areas of shallow soils with low cover, to deeper soils with more grass cover and scattered bush clumps. The vegetation is typical of Bushmanland Arid Grassland and is dominated by arid bunchgrasses such as *Stipagrostis ciliata*, *S.obtusa*, *S.brevifolia*, *S.anomala*, *Enneapogon scaber*, with occasional areas with more shrubs including *Rhigozum trichotomum*, *Lycium cinereum*, *Hermannia spinosa*, *Salsola rabieana*, *Asparagus capensis*, *Tetragonia arbuscula*, *Melolobium candicans*, *Eriocephalus spinescens*, *Zygophyllum retrofractum*, *Pteronia glomerata*, *Rhigozum trichotomum* and *Aptosimum spinescens* as well as forbs such as *Zygophyllum simplex*, *Tribulis zeyheri*, *Leysera tenella*, *Sesamum capense*, *Cucumis myriocarpus*, *Gazania lichtensteinii*, *Augea capensis* and *Mesembryanthemum crystalinum*. The abundance of listed or protected species within the study area is low and apart from a low density of *Hoodia gordonii*, no other significant species were observed. There did not appear to be any rare or restricted habitats present at the site, such as calcrete or quartz patches and there are no drainage features within the site either. The rocky hills to the north of the site, visible in the first image below are considered sensitive as these habitats usually contain an abundance of endemic or threatened plant species and are also important for fauna, but are outside of the development footprint and will not be affected.



Deeper Aeolian soils within the CSP 2 site are dominated by various *Stipagrostis* grasses with occasional clumps of shrubs, largely *Rhigozum trichotomum*.



Looking northwest over the CSP 2 site, showing the extensive flat plain the site is located on and the homogenous nature of the vegetation and the lack of features within the development areas. The hill in the distance is outside of the development footprint.

Pipeline Corridors



Looking along the alignment of Pipeline 1 and 3 from the site, towards Black Mountain which is visible in the distance. The vegetation is dominated by *Stipagrostis brevifolia* and *S.ciliata* with the shrubs being mostly *Rhigozum trichotomum*. The abundance of species and features of conservation concern in this area is low and it is not considered highly sensitive.



Looking back towards the Letsoai site from the water storage reservoir on Black Mountain Mine, showing the final alignment of Pipeline Option 1 and Option 2. This area is considered moderately sensitive on account of the presence of species and habitats of concern on the plains in this area, where quartz patches are present.



Pipeline Alternative 2 traverses the red dunes of the Koa River valley, which although it does not contain an abundance of listed species, is vulnerable to disturbance due to the mobile sands. Dominant and common species include grasses such as *Stipagrostis ciliata*, *S.brevifolia*, *S.amabilis*, *Centropodia glauca* and *Cladoraphis spinescens* as well as shrubs such as *Requienia sphaerosperma*, *Hermannia tomentosa*, *Monechma incanum*, *Lebeckia spinescens*, *Lycium bosciifolium* and *Crotalaria spartioides*.



Typical rocky plains habitat along the Pipeline Option 3, between Pella and Aggeneys. The areas of rocky outcrops and shallow gravel soils along this section of the route are typically sensitive with an abundance of listed and endemic species including habitat specialists such as *Titanopsis* and *Lithops*.



The sandy plains towards Pella, with numerous *Aloe dichotoma* and the mountains along the Orange River visible in the distance. Apart from the *Aloe dichotoma*, there are also several other listed and protected species present in this area and it is considered moderately sensitive.



Habitat specialists such as *Titanopsis* and *Lithops* are confirmed present along Pipeline Option 3 between Pella and Aggeneys and although there is already an existing pipeline along the alignment, the new pipeline would extend the current footprint and would be highly likely to affect species of conservation concern.



Although there is already a pumpstation at the Orange River at the extraction point, the access to the river is through a narrow gorge and it is difficult to see how an additional pipeline can be accommodated through this section without significant additional disturbance as the existing pipelines will need to be avoided and they have already occupied the most favourable route.

4.7 FAUNAL COMMUNITIES

Mammals

The site falls within the distribution range of 46 terrestrial mammals, although only around 20 are recorded in the area on a regular basis based on records from the MammalMap database. Species that can be confirmed present in the area based on previous site visits to the area include Black-backed Jackal, African Wildcat, Cape Fox, Rock Hyrax, South African Ground Squirrel, Steenbok, Springbok, Gemsbok, Cape Porcupine, Yellow Mongoose, Cape Hare, Aardvark and Round-eared Elephant Shrew.

Species associated with the rocky outcrops of the area include Rock Hyrax *Procavia capensis*, Klipspringer *Oreotragus oreotragus*, Pygmy Rock Mouse *Petromyscus collinus*, Namaqua Rock Mouse *Aethomys namaquensis* and Western Rock Elephant Shrew *Elephantulus rupestris*. The open plains which characterise the development area are dominated by species associated with open hard or sandy ground such as various gerbils including the Hairy-footed Gerbil *Gerbillurus*

paeba. There were also many burrows of Ground Squirrels and Yellow Mongoose at the site and these appear to be the most common fauna within the development area. There are no areas of particular significance for mammals at the site as the habitat is repetitive and broadly homogenous. The rocky hills to the north of the site would be important for fauna and are considered sensitive, but are not directly affected by the current development.

Two listed species may occur in the area, the Black-footed cat *Felis nigripes* (Vulnerable) and Leopard *Panthera pardus* (Near Threatened). Given the extremely low cover at the site it is not likely that Leopard are present in the study area. The habitat is however suitable for the Black-footed Cat which favours a mix of open and more densely vegetated areas. However this species is widely distributed across the arid and semi-arid areas of South Africa, and the development would not amount to a significant amount of habitat loss for this species, although some cumulative impact in the area is a developing threat.

The major impact associated with the development of the sites for mammals would be habitat loss for resident species and potentially some disruption of the broad-scale connectivity of the landscape.

Reptiles

Although reptile diversity in the broader area is high with as many as 60 species known from the area, only a fraction of this is likely to be present within the development study area itself. A large proportion of the reptiles of the area consist of species associated with the inselbergs and rocky hills along the Orange River and would not occur on the open plains characteristic of the site. More typical plains species are likely to dominate the study area and species observed in the area include Verrox's Tent Tortoise *Psammobates tentorius verroxii*, Namaqua Sand Lizard *Pedioplanis namaquensis*, Spotted Desert Lizard *Meroles suborbitalis*, Southern Rock Agama *Agama atra* and Plain Sand Lizard *Pedioplanis inornata*.

As with mammals, there are not likely to be any highly significant impacts on reptiles outside of some habitat loss resulting from the development. There are no specialized reptile habitats within the development footprint which is restricted to the open plains habitat which is widespread in the area. Some species such as geckos will probably increase within the development on account of the increased vertical structure and shelter provided by the heliostat supports and other associated buildings of the development.



The most common reptiles at the site are the Namaqua Sand Lizard *Pedioplanis namaquensis* and Verroxx's Tent Tortoise *Psammobates tentorius verroxii* which occurs at a low density.

Amphibians

Only eight frog species are known from the area around the site and even this is a gross overestimate of the number of amphibian species likely to be present within the site. There are few freshwater features present and only species able to live independently of water will be present at the site. As such the only species likely to be present within the site would be the Karoo Toad *Vandijkophrynus garipeensis*. Given the very low likely abundance of amphibians at the site, impacts on amphibians are likely to be local in extent and of low significance.

5 SITE SENSITIVITY ASSESSMENT

The sensitivity of the Letsoai CSP 2 site is indicated below in Figure 5 and shows that the development area is within an area that is considered medium to medium-low sensitivity. The areas of deeper soils are considered somewhat more sensitive than the surrounding areas of shallow soils due to the greater risk of wind erosion in these areas as well as their likely greater significance for fauna. The internal grid connection options are also within areas considered to be Medium-Low sensitivity, except for the option in the west (substation 1) which is within an area considered to be Medium sensitivity. There are no highly sensitive features or significant species of conservation concern within the CSP 2 development footprint. Since CSP development requires the near-total clearing of the development footprint, options for avoidance are minimal and all vegetation within the development area will likely be lost. Although this is a potentially significant impact in terms of direct habitat loss, the diversity of the affected area is low and the affected habitats are widely available in the area. As such, the significance of this impact is moderated by the low sensitivity of affected area and would be of local significance only.

In terms of the preferred on-site substation option, all three are considered acceptable and the preferred option should be the alternative which results in the least overall footprint and extent

of power line based on the whole project and not just based on CSP 2. As such, this is likely to be either substation option 1 or substation option 3 and from an ecological perspective, these two options can be considered equivalent.

In terms of the water supply pipeline options (Figure 7), Option 1 traverses the least sensitive areas and is clearly the preferred option. Option 2 is somewhat more sensitive overall as it traverses the Koa River valley, where the loose dune sands are vulnerable to erosion. The route is however adjacent to the access road through this area which would reduce the impact to some extent. As such this is considered an acceptable but less preferred option. Option 3 goes all the way to the Orange River and traverses several areas with significant populations of species of conservation concern. In addition, mitigating impacts through the final section of the route along the gorge to the Orange River would be problematic. This option would generate a significantly higher impact than the other two options and is not considered a favourable option.

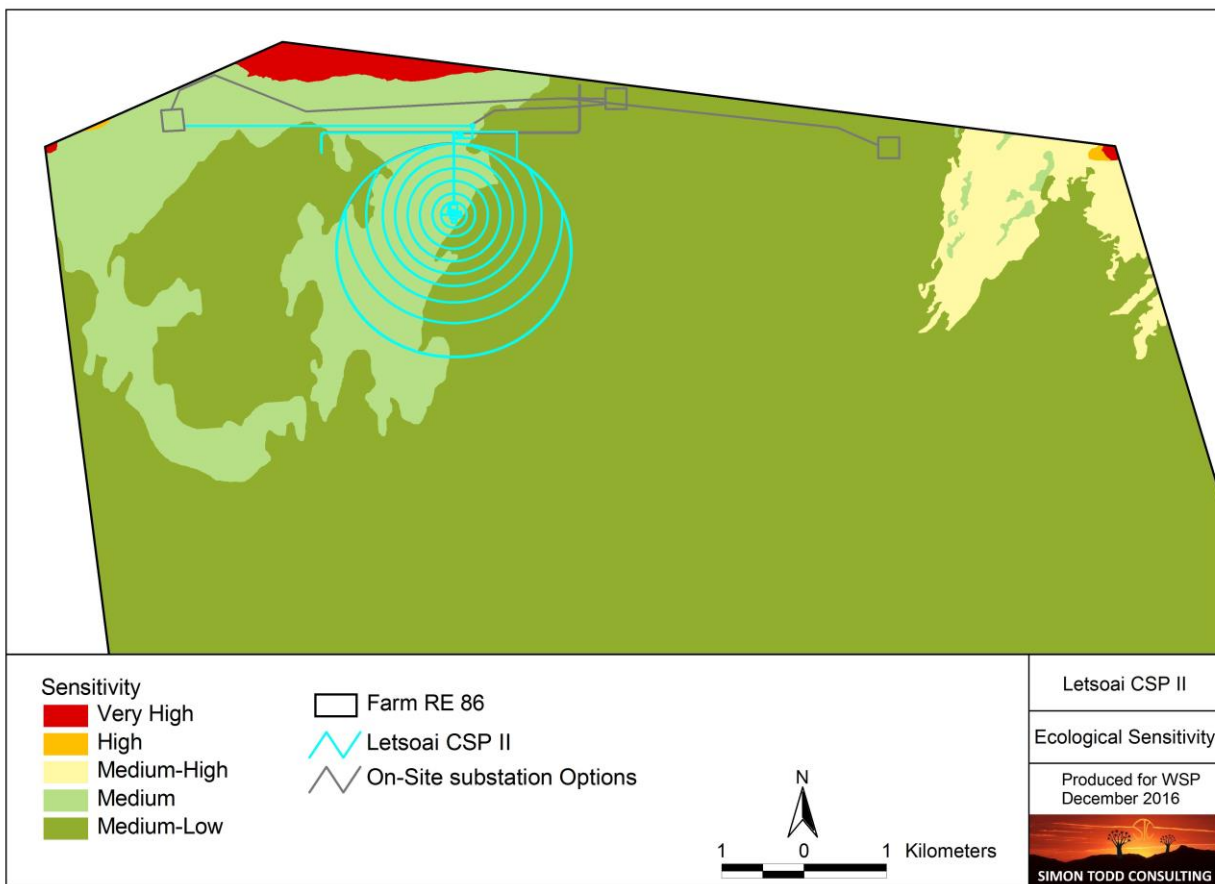


Figure 6. Ecological sensitivity map of the Letsoai CSP 2 development footprint and surrounding area, showing that the affected area is medium to medium-low sensitivity.

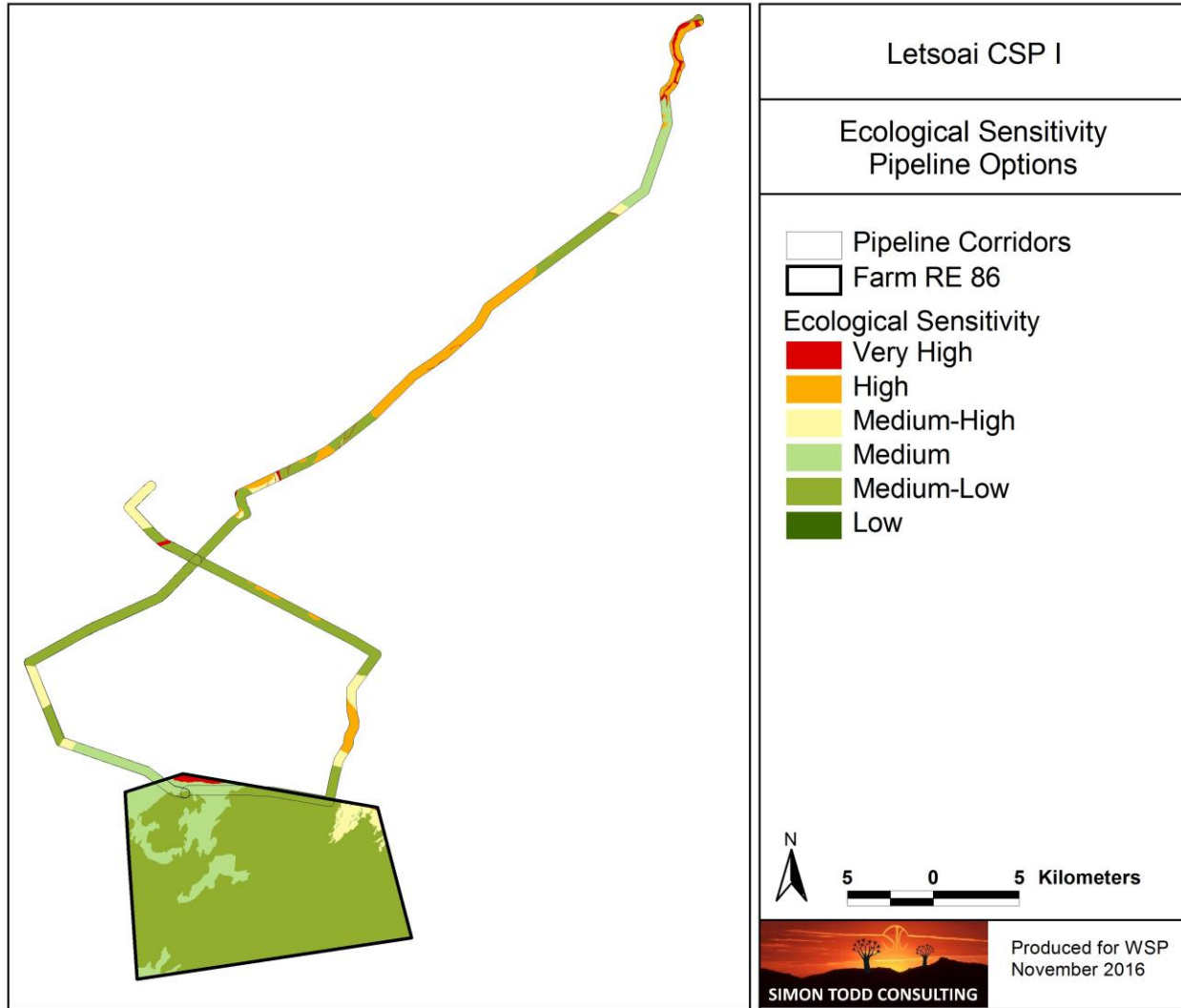


Figure 7. Ecological sensitivity of the Letsoai site and pipeline corridors. Option 1 is to the west and terminates at the Black Mountain storage reservoir, Option 2 is to the east and terminates as for Option 1. Option 3 follows Option 1 until the routes meet with Route 2 after which Option 3 alone goes all the way to Orange River in the north.

6 IMPACTS AND ISSUES IDENTIFICATION

The likely impacts on the terrestrial ecology of the site resulting from the development of the Letsoai CSP 2 development are identified and discussed below with reference to the characteristics and features of the site. The development of the Letsoai CSP 2 project is likely to result in a variety of impacts, associated largely with the disturbance, loss and transformation of intact vegetation and faunal habitat to hard infrastructure such as heliostat arrays, roads, operations buildings etc. The following impacts were identified during the scoping phase as the major impacts that are likely to be associated with the development, for the preconstruction, construction and operational phases of the development. The major risk factors and

contributing activities associated with the development are identified and briefly outlined and summarized below before the impacts are assessed.

Impacts on vegetation and protected plant species

It is confirmed that some protected plant species such as *Hoodia gordonii* occur within the site and it is highly likely that some individuals will be impacted on by the development. However, as the abundance of such species is low within the CSP footprint, the major impact would be on vegetation loss in a general sense and not on any particular species. Within solar PV plants, it is usually possible to leave some intact vegetation between the rows of panels but CSP footprints are usually sterilized and so the assessed assumes the total loss of all vegetation within the development footprint. There are however some significant populations of species of conservation concern (SCC) along Pipeline Option 3 and an impact on SCC is highly likely under this option.

Direct Faunal impacts

Construction and operational phase noise, pollution, disturbance and human presence will be detrimental to fauna. Sensitive and shy fauna would move away from the area as a result of the noise and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Some mammals or reptiles such as tortoises would be vulnerable to illegal collection or poaching during the construction phase as a result of the large number of construction personnel that are likely to be present. During operation, the site will be inhospitable for many fauna and this will contribute to the disruption of faunal habitat and movement in the area. In addition, night-lighting and electrical fencing may also generate negative impacts and if there are any evaporation or other water ponds present, these should either be covered or fenced to prevent fauna from falling in.

Increased alien plant invasion

Alien plants are likely to invade the site and disturbed areas around the margins of the site as a result of the large amounts of disturbance created during operation. However as the construction phase would be about 2 years, this is not long enough for significant alien problems to develop and the major impact and required mitigation measures would be expressed in the Operational phase. Current levels of plant invasion at the site are low. Alien species such as *Prosopis* are however present and would potentially invade the site along with other typical weedy species such as *Salsola kali*.

Increased Erosion Risk

Disturbance at the site due to construction and the operation of heavy machinery will significantly increase the risk of erosion at the site, both from wind and water. Although rainfall in the area is low, sediment yields from arid ecosystems are high because the vegetation cover is too low to limit erosion and occasional thunder storms or rare heavy rainfall events can cause significant erosion in a single event. In addition, the loose red sands of the area are vulnerable

to mobilisation as the red dunes of the Koa River attest. Dust suppression during construction will be required and erosion risk will extend into the operational phase until bare areas have been revegetated or protected with a less mobile substrate.

Impacts on Broad-Scale Ecological Processes and Loss of Landscape Connectivity

As the current project forms part of a larger project with multiple PV and CSP plants and there are also several other proposed renewable energy developments in the area, the development of the site would contribute towards cumulative impacts, particularly the loss of landscape connectivity. The site will be fenced and the cleared parts of the site are also likely to be hostile to many smaller fauna which will prevent or impede their movement across the landscape.

Reduced ability to meet conservation obligations & targets

The loss of unprotected vegetation types on a cumulative basis from the broad area may impact the countries' ability to meet its conservation targets. The receiving vegetation types in the study area are classified as Least Threatened and they are extensive vegetation types that are still more than 99% intact. The development of the CSP 2 site would result in the loss of up to 200ha of intact habitat which on its own is not considered highly significant, but as there is an array of other developments in the area, the possibility for significant cumulative impact on the affected vegetation types or on more localised plant communities is a potential concern, especially given the NPAES status of the site. However, within CSP 2 there are no significant features present and the development is restricted to the grassy plains of the area, which are not restricted and broadly available.

7 IMPACT ASSESSMENT

The assessment methodology used here is in accordance with the revised 2014 EIA regulations and based on the assessment approach recommended by Hacking (2001). The Letsoai CSP Plant is first assessed and then the associated water supply pipeline.

7.1 LETSOAI CSP 2

7.1.1 PLANNING & CONSTRUCTION PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Planning & Construction Phase Impacts		
<i>IMPACT: Impacts on vegetation and protected plant species:</i>		
Letsoai CSP 2	Medium	Medium
No-Go Option	Low	

IMPACT: Faunal impacts due to construction activities

Letsoai CSP 2	Medium	Low
No-Go Option	Low	

IMPACT: Areas disturbed during construction will be vulnerable to wind and water erosion.

Letsoai CSP 2	Medium	Low
No-Go Option	Low	

Summary of impacts:

Vegetation Impacts:

Impacts on vegetation and protected plant species will occur due to vegetation clearing and disturbance associated with the construction of the CSP 2 plant. As the entire area is likely to be cleared and levelled, there is little scope for mitigation and post mitigation impacts will remain **medium**.

Mitigation Measures:

- Preconstruction walk-through of the final development footprint to ensure that sensitive habitats and species can be avoided where possible.
- Species suitable for search and rescue to be identified in the preconstruction walk through.
- Clearing & translocation permit should be obtained from NC-DENC before construction commences.
- The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- Sensitive features near to construction areas should be demarcated as no-go areas with construction tape or similar and signposted as such.

Faunal Impacts:

Disturbance, transformation and loss of habitat during construction of the CSP plant will have a negative effect on resident fauna. However, faunal diversity and density within the site is low and post mitigation impacts are likely to be **Low** and of local significance only. Large amounts of noise and disturbance at the site during construction is largely unavoidable due to the operation of heavy machinery. All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes, tortoises and other vulnerable fauna.

Mitigation Measures:

- During construction any fauna directly threatened by the construction activities should be removed to a safe location by the ECO or other suitably qualified person.
- The illegal collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the construction site.
- No fires should be allowed within the site as there is a risk of runaway veld fires.
- No fuelwood collection should be allowed on-site.
- No dogs or cats should be allowed on site apart from that of the landowners.
- If any parts of site such as construction camps must be lit at night, this should be done with

low-UV type lights (such as most LEDs), which do not attract insects and which should be directed downwards.

- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.
- No unauthorized persons should be allowed onto the site and site access should be strictly controlled.
- All construction vehicles should adhere to a low speed limit (40km/h for cars and 30km/h for trucks) to avoid collisions with susceptible species such as snakes and tortoises. Speed limits should apply within the facility as well as on the public gravel access roads to the site.
- All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes and tortoises which are often persecuted out of fear or superstition.
- Any trenches that need to be dug for construction should not be left open for extended periods of time as smaller fauna will fall in and become trapped. Where trenches are dug and must be left open for several days, there should be loose soil ramps at regular intervals for fauna to escape. Alternatively, the trenches should be inspected regularly and trapped fauna removed.
- The plant should be fenced in a manner which does not negatively affect fauna. If the fence is electrified, the live strands should be on the inside of the fence and not the outside. Where, this is not possible, the lowest live strand should not be less than 30cm from the ground.

Erosion Impacts:

Areas disturbed during construction will be vulnerable to disturbance from wind and rain erosion. Although the site is arid, exceptional rainfall events can cause significant erosion events, as the low vegetation cover does not provide adequate protection for the loose soils. Disturbance will raise the possibility of wind erosion and dust suppression will be required during construction. With mitigation, this impact can however be reduced to a **Low** level.

Mitigation Measures:

- Dust suppression and erosion management should be an integrated component of the construction approach.
- Disturbance near to drainage lines should be avoided and sensitive drainage areas near to the construction activities should be demarcated as no-go areas.
- Sediment traps and wind shields may be necessary to prevent erosion and soil movement if there are topsoil dumps exposed for extended periods of time.
- A low cover of vegetation should be left wherever possible within the construction footprint to bind the soil, prevent erosion and promote post-disturbance recovery of an indigenous ground cover.
- All roads and other hardened surfaces should have runoff control features.
- Runoff from the facility should be captured in ponds to allow sediment and pollution to settle before the water is released or allowed to evaporate.

7.1.2 OPERATIONAL PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Operation Phase Impacts		
<i>Impact: Faunal Impacts due to Operation</i>		
Letsoai CSP 2	Medium	Low
No-Go Option	Low	
<i>IMPACT: Alien invasive plants impacts</i>		
Letsoai CSP 2	Medium	Low
No-Go Option	Low	
<i>IMPACT: Following construction, disturbed areas will remain vulnerable to erosion for some time.</i>		
Letsoai CSP 2	Medium	Low
No-Go Option	Low	

Summary of impacts:

Faunal Impacts due to Operation

The presence and operation of the facility will cause some impact to fauna due to disturbance or direct impact from electrical fencing, night lighting etc. Some fauna will inevitably find their way into the facility and want to live inside the plant. This is common for smaller mammals such as ground squirrels and mongoose. These should be tolerated and not persecuted but also not provided with food or other enticements. The presence of these animals in the site can be seen as beneficial because the mongoose will prey on rodents that can build up in PV and CSP plants and which might otherwise attract a lot of snakes, which also occurs.

Mitigation Measures:

- Management of the site should take place within the context of an Open Space Management Plan.
- No unauthorized persons should be allowed onto the site.
- Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities should be removed to a safe location.
- The illegal collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden by anyone except landowners with the appropriate permits where required.
- If the site must be lit at night for security purposes, this should be done with downward-directed low-UV type lights (such as most LEDs), which do not attract insects.
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.
- Any dams or evaporation ponds at the site should be covered or fenced to prevent larger animals from accessing these areas. If not covered, there should however also be a ramp

or ladder present where fauna that fall into the water can escape. These dams are often lined with plastic of some or other slippery surface and animals may drown if they fall in and are unable to get out due to the steep or slippery sides.

Alien invasive plants:

Alien plants are likely to invade the site as a result of the large amounts of disturbance created during construction. Alien plant invasion would contribute to cumulative habitat degradation in the area, but if alien species are controlled, then cumulative impact from alien species would not be significant during the operational phase.

Mitigation Measures:

- Problem woody species such as *Prosopis* are already present in the area and are likely to increase rapidly if not controlled.
- Regular (annual) monitoring for alien plants within and near the development footprint.
- Regular alien clearing should be conducted using the best-practice methods for the species concerned. The use of herbicides should be avoided as far as possible, although for some species, such as those that are strong resprouters, this may be the best-practice method.

Erosion Impacts:

Areas disturbed during construction will remain vulnerable to disturbance for some time into the operational phase and will require regular maintenance to ensure that erosion is minimised. With mitigation, this impact can however be reduced to a **Low** level.

Mitigation Measures:

- Regular (annual) monitoring for erosion problems along the access roads and other cleared areas.
- Erosion problems should be rectified on a regular basis and this may include the revegetation of bare or eroded areas.

7.1.3 DECOMMISSIONING PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Decommissioning Phase Impacts		
<i>IMPACT: Impacts on fauna:</i>		
Letsoai CSP 2	Low	Low
No-Go Option	Low	
<i>IMPACT: Following decommissioning, the site will remain vulnerable to erosion.</i>		
Letsoai CSP 2	Medium	Low
No-Go Option	Low	

IMPACT: Following decommissioning, the site will remain vulnerable to alien plant invasion

Letsoai CSP 2	Medium	Low
No-Go Option	Low	

Summary of impacts:

Faunal Impacts:

Disturbance or persecution of fauna during the decommissioning phase may occur. The operation of heavy machinery and human presence at the site during decommissioning would impact fauna in and near the development. However, this would be temporary and faunal diversity and density within the site is low and post mitigation impacts are likely to be **Low**.

Mitigation

- All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes and tortoises.
- Any fauna threatened by the decommissioning activities should be removed to safety by the ECO or appropriately qualified environmental officer.
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site.
- Any trenches that need to be dug should not be left open for extended periods of time as smaller fauna will fall in and become trapped.
- All waste and material on-site that is not recycled as part of decommissioning, should be removed from the site to a suitable waste disposal site.
- The site should be rehabilitated using locally occurring grasses and shrubs.

Erosion Impacts:

Areas disturbed during decommissioning will remain vulnerable to disturbance for some time and erosion should be minimised through site rehabilitation and erosion management. With mitigation, this impact can be reduced to a **Low** level.

Mitigation Measures:

- All cleared and disturbed areas should be re-vegetated after decommissioning with locally occurring species.
- The site should be inspected annually for erosion problems for at least 5 years after decommissioning or until such time as the vegetation has recovered to levels equivalent to the adjacent rangeland.

Alien invasive plants:

Alien plants are likely to invade the site as a result of the large amounts of disturbance created during decommissioning. Alien clearing will be required for several years after decommissioning until the natural vegetation has returned sufficiently to suppress invaders.

Mitigation Measures:

- Problem woody species such as *Prosopis* are already present in the area and are likely to increase rapidly if not controlled.

- Regular (annual) monitoring for alien plants within disturbed areas created by decommissioning.
- Regular alien clearing should be conducted using the best-practice methods for the species concerned and should be conducted for at least 5 years after decommissioning or until the natural vegetation has returned.

7.2 WATER SUPPLY PIPELINE

7.2.1 PLANNING & CONSTRUCTION PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Planning & Construction Phase Impacts		

IMPACT: Impacts on vegetation and protected plant species:

Pipeline Option 1	Medium	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	High	Medium
No-Go Option	Low	

IMPACT: Faunal impacts due to construction activities

Pipeline Option 1	Low	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Medium
No-Go Option	Low	

IMPACT: Areas disturbed during construction will be vulnerable to wind and water erosion.

Pipeline Option 1	Low	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Low
No-Go Option	Low	

Summary of impacts:

Vegetation Impacts:

Impacts on vegetation and protected plant species will occur due to vegetation clearing and disturbance associated with the construction of the water supply pipeline. Option 1 is most favourable in this regard, followed by Option 2 with Option 3 being considered least favourable on account of the confirmed presence of species of conservation concern along the route.

Mitigation Measures:

- Preconstruction walk-through of the final development footprint to ensure that sensitive

habitats and species can be avoided where possible.

- Species suitable for search and rescue to be identified in the preconstruction walk through.
- Clearing & translocation permit should be obtained from NC-DENC before construction commences.
- The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- Sensitive features near to construction areas should be demarcated as no-go areas with construction tape or similar and signposted as such.

Faunal Impacts:

Disturbance, transformation and loss of habitat during construction of the pipeline will have a negative effect on resident fauna. However, disturbance will be transient post-mitigation impacts are likely to be **Low** and of local significance only. Although there are no highly significant faunal habitats along any of the options, the Koa River valley is identified as a sensitive faunal habitat and Option 3 is also significantly longer than the other options, increasing the relative impact and there are also some rocky areas of significance for reptiles along the route. As with vegetation impacts, Option 1, followed by Option 2 and then Option 3 would generate increasing impact.

Mitigation Measures:

- Any trenches that need to be dug for construction should not be left open for extended periods of time as smaller fauna will fall in and become trapped. Where trenches are dug and must be left open for several days, there should be loose soil ramps at regular intervals for fauna to escape. Alternatively, the trenches should be inspected regularly and trapped fauna removed.
- During construction any fauna directly threatened by the construction activities should be removed to a safe location by the ECO or other suitably qualified person.
- The illegal collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the construction site.
- No fuelwood collection should be allowed on-site.
- If any parts of site such as construction camps must be lit at night, this should be done with low-UV type lights (such as most LEDs), which do not attract insects and which should be directed downwards.
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.
- No unauthorized persons should be allowed onto the site and site access should be strictly controlled.
- All construction vehicles should adhere to a low speed limit (40km/h for cars and 30km/h for trucks) to avoid collisions with susceptible species such as snakes and tortoises. Speed limits should apply within the facility as well as on the public gravel access roads to the site.
- All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes and tortoises which are often persecuted out of fear or superstition.

Erosion Impacts:

Areas disturbed during construction will be vulnerable to disturbance from wind and rain erosion. Although the site is arid, exceptional rainfall events can cause significant erosion events, as the low vegetation cover does not provide adequate protection for the loose soils. Disturbance will raise the possibility of wind erosion and dust suppression will be required during construction. With mitigation, this impact can however be reduced to a **Low** level for Option 1 but there will be higher residual risk from Option 2 and 3, due to the disturbance of the Koa River valley along Option 2 and the long route and vulnerable nature of large parts of Option 3.

Mitigation Measures:

- Dust suppression and erosion management should be an integrated component of the construction approach.
- Disturbance near to drainage lines should be avoided and sensitive drainage areas near to the construction activities should be demarcated as no-go areas.
- Sediment traps and wind shields may be necessary to prevent erosion and soil movement if there are topsoil dumps exposed for extended periods of time.
- All roads and other hardened surfaces should have runoff control features.

7.2.2 OPERATIONAL PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Operation Phase Impacts		
<i>Impact: Faunal Impacts due to Operation</i>		
Pipeline Option 1	Low	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Low
No-Go Option	Low	Low
<i>IMPACT: Alien invasive plants impacts</i>		
Pipeline Option 1	Medium	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Medium
No-Go Option	Low	Low
<i>IMPACT: Following construction, disturbed areas will remain vulnerable to erosion for some time.</i>		
Pipeline Option 1	Medium	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Medium
No-Go Option	Low	Low

Summary of impacts:

Faunal Impacts due to Operation

The presence and operation of the pipeline will cause some impact to fauna due to disturbance during maintenance or preventing fauna from crossing the pipeline, above or below ground. However with mitigation, this can be reduced to a low level for all options.

Mitigation Measures:

- Any potentially dangerous fauna such as snakes or fauna threatened by the maintenance and operational activities should be removed to a safe location.
- The illegal collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden by anyone except landowners with the appropriate permits where required.
- If any parts of site must be lit at night for security purposes, this should be done with downward-directed low-UV type lights (such as most LEDs), which do not attract insects.
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.
- Any storage ponds, overflow dams or evaporation ponds at the site should be covered or fenced to prevent larger animals from accessing these areas. If not covered, there should however also be a ramp or ladder present where fauna that fall into the water can escape. These dams are often lined with plastic of some or other slippery surface and animals may drown if they fall in and are unable to get out due to the steep or slippery sides.

Alien invasive plants:

Alien plants are likely to invade the disturbed areas long the pipeline route as a result of the large amounts of disturbance created during construction. Alien plant invasion would contribute to cumulative habitat degradation in the area, but if alien species are controlled, then cumulative impact from alien species would not be significant during the operational phase. This is however likely to be a persistent impact along Option 3 as the route through the canyon to the Orange River is highly vulnerable to alien invasion, especially *Prosopis* as it is regularly disturbed during flood events of the Goob se Laagte river which runs through the canyon.

Mitigation Measures:

- Problem woody species such as *Prosopis* are already present in the area and are likely to increase rapidly if not controlled.
- Regular (annual) monitoring for alien plants within and near the development footprint.
- Regular alien clearing should be conducted using the best-practice methods for the species concerned. The use of herbicides should be avoided as far as possible, although for some species, such as those that are strong resprouters, this may be the best-practice method.

Erosion Impacts:

Areas disturbed during construction will remain vulnerable to disturbance for some time into the operational phase and will require regular maintenance to ensure that erosion is minimised. With mitigation, this impact can be reduced to a **Low** level for Option 1 and 2. However,

Option 3 traverses some vulnerable areas and erosion problems are likely to be a persistent problem into the operational phase.

Mitigation Measures:

- The pipeline should be checked for leaks on a regular basis, as excessive water can damage arid-adapted plants and also cause erosion problems.
- Regular (annual) monitoring for erosion problems along the pipeline and other cleared areas.
- Erosion problems should be rectified on a regular basis and this may include the revegetation of bare or eroded areas.

7.2.3 DECOMMISSIONING PHASE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Decommissioning Phase Impacts		

IMPACT: Impacts on fauna:

Pipeline Option 1	Low	Low
Pipeline Option 2	Low	Low
Pipeline Option 3	Medium	Low
No-Go Option	Low	

IMPACT: Following decommissioning, the site will remain vulnerable to erosion.

Pipeline Option 1	Medium	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Medium
No-Go Option	Low	

IMPACT: Following decommissioning, the site will remain vulnerable to alien plant invasion

Pipeline Option 1	Medium	Low
Pipeline Option 2	Medium	Low
Pipeline Option 3	Medium	Medium
No-Go Option	Low	

Summary of impacts:

Faunal Impacts:

Disturbance or persecution of fauna during the decommissioning phase may occur. The operation of heavy machinery and human presence along the pipeline during decommissioning would impact fauna in and near the route. However, this would be temporary and faunal diversity and density within the site is low and post mitigation impacts are likely to be **Low**.

Mitigation

- All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes and tortoises.
- Any fauna threatened by the decommissioning activities should be removed to safety by the ECO or appropriately qualified environmental officer.
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site.
- Any trenches that need to be dug should not be left open for extended periods of time as smaller fauna will fall in and become trapped.
- All waste and material on-site that is not recycled as part of decommissioning, should be removed from the site to a suitable waste disposal site.
- The disturbance footprint should be rehabilitated using locally occurring grasses and shrubs.

Erosion Impacts:

Areas disturbed during decommissioning will remain vulnerable to disturbance for some time and erosion should be minimised through site rehabilitation and erosion management. With mitigation, this impact can be reduced to a **Low** level for Options 1 and 2 and **Medium** for Option 3.

Mitigation Measures:

- All cleared and disturbed areas should be re-vegetated after decommissioning with locally occurring species.
- The site should be inspected annually for erosion problems for at least 5 years after decommissioning or until such time as the vegetation has recovered to levels equivalent to the adjacent rangeland.

Alien invasive plants:

Alien plants are likely to invade the site as a result of the large amounts of disturbance created during decommissioning. Alien clearing will be required for several years after decommissioning until the natural vegetation has returned sufficiently to suppress invaders.

Mitigation Measures:

- Problem woody species such as *Prosopis* are already present in the area and are likely to increase rapidly if not controlled.
- Regular (annual) monitoring for alien plants within disturbed areas created by decommissioning.
- Regular alien clearing should be conducted using the best-practice methods for the species concerned and should be conducted for at least 5 years after decommissioning or until the natural vegetation has returned.

7.3 CUMULATIVE IMPACTS

Phase & Impact	Before Mitigation	After Mitigation
Cumulative Impacts		
<i>IMPACT: Cumulative habitat loss and impacts on broad-scale ecological processes and loss of landscape connectivity</i>		
Letsoai CSP 2	Medium	Low
No-Go Option	Low	
<i>IMPACT: Reduced ability to meet conservation targets</i>		
Letsoai CSP 2	Low	Low
No-Go Option	Low	

Summary of impacts:

Cumulative impacts:

The contribution of the Letsoai CSP 2 development to cumulative impacts will be relatively low at approximately 200ha of low sensitivity habitat. The development does however occur as part of a larger development consisting of 5 solar PV plants and 2 CSP plants, with a total footprint of more than 1000ha. As it is not possible to tell which of these will actually be built under the REIPPP, it is not possible to firmly predict the contribution of the CSP 2 plant to cumulative impact in the area. However, at a broad scale, the area is not heavily developed and even with the development of several of the other proposed developments in the area, the overall level of cumulative impact in the area is likely to remain low. The current site is also located on the open plains of the area, which is considered to be the least sensitive habitat of the area. Provided that the deep sands of the Koa River valley itself and the inselbergs with their plateaus and surroundings toeslopes remain relatively free of development, then the overall impact of development on biodiversity in the area will be relatively low.

Mitigation Measures:

- The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- If several of the PV or CSP plants are developed, then some undeveloped corridors to maintain connectivity should be allowed to persist between plants.

There should be an open space management plan for the project area, which includes measures to allow for the maintenance of landscape connectivity for fauna, through maintaining some areas in a natural state to allow fauna to pass through the area. **Reduced**

Ability to Meet Conservation Targets:

The loss of unprotected vegetation types may impact the countries' future ability to meet its conservation targets. The area has been identified as a NPAES focus area and development within this area may compromise the value of the area for future conservation area expansion. However, the affected Bushmanland Arid Grassland vegetation type is extensive and the extent of habitat loss from the development (200ha) would not significantly impact the remaining extent of this vegetation type, either locally or regionally. In addition, the main

habitats of conservation concern, the rocky hills and specialised edaphic habitats such as quartz or calcrete patches would not be affected by the development.

Mitigation Measures:

- The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- There should be an open space management plan for the project area, which includes measures to allow for the maintenance of landscape connectivity for fauna, through maintaining some areas in a natural state to allow fauna to pass through the area.
- Any fences surrounding the development should be fauna-friendly in their design, which includes restricting electrified strands to the inside of the fence, or no closer than 30cm to the ground.

8 COMPARATIVE ASSESSMENT

A comparative assessment of the three pipeline options is provided below, highlighting the main differences and potential impacts associated with each option. Option 1 is identified as the preferred option as it is shorter and is located within an area of lower sensitivity than Option 2. Option 3 is considered significantly less favourable and would generate significantly higher impact after mitigation.

Alternative	Preference	Reasons (incl. potential issues)
PIPELINE ALTERNATIVES		
Option 1	Preferred	This pipeline option traverses the typical open plains of the site, consisting of Bushmanland Arid Grassland and Bushmanland Sandy Grassland. There are no highly sensitive features along the corridor route and impacts can be expected to be low and of a local nature only. This is clearly the preferred Option for the development and would generate significantly less impact and residual risk than Option 3.
Option 2	Less Preferred	Option 2 is similar to Option 1, but traverses the Koa River valley which is an area considered sensitive and vulnerable to disturbance and residual impacts will be difficult to manage. This is not considered the preferred option and should only be used if Option 1 is not possible.
Option 3	Not Preferred	Option 3 is significantly longer than the other two options and traverses a number of sensitive areas between Aggeneys and the Orange River, with confirmed presence of species of conservation concern that are highly likely to be impacted by the development. In addition, the final section of the route through the mountains to the Orange River is along a dry water course where there are already two pipelines present and it

Alternative	Preference	Reasons (incl. potential issues)
		will be difficult to accommodate the additional pipeline without creating significant additional disturbance. This is not a preferred option and would generate significantly higher impact than the other two options.

9 CONCLUSIONS & RECOMMENDATIONS

The Letsaoi CSP 2 footprint is located on the open plains of the study site, which are considered to be medium to medium-low sensitivity. Although there are certainly some sensitive features and areas in the wider area, the effected sandy plains habitat exhibits relatively low diversity and a low abundance of fauna or flora of conservation concern. Although there are no features of high sensitivity within the site, the areas of deeper soils are considered somewhat more sensitive than the surrounding areas of shallow soils due to the greater risk of wind erosion in these areas as well as their likely greater significance for fauna.

The major impact associated with the development of the CSP plant would be the near-total loss of habitat within the 700ha plus development footprint. Consequently, options for avoidance are minimal and all vegetation within the development area will likely be lost. Although this is a potentially significant impact in terms of direct habitat loss, the diversity of the affected area is low and the affected habitats are widely available in the area. As such, the significance of this impact is moderated by the low sensitivity of affected area and would be of local significance only and considered to be of Medium significance after mitigation.

In terms of the three pipeline options, Option 1 is clearly the preferred option and there are no highly sensitive features along the route and impacts are likely to be low and of a local nature only. Option 2 is similar to Option 1, but takes a different route to the N14 that includes the Koa River valley, which is considered sensitive and vulnerable to disturbance due to the dunes in this area. Option 3 is not a preferred option and would generate significantly higher impact than the other two options due to the longer route and the confirmed presence of significant populations of species of conservation along the route, that are highly likely to be impacted by the development.

The potential for cumulative impacts from renewable energy development is a concern associated with the development given the large number of proposed renewable energy projects in the wider area. There are however few preferred bidders and even in the long-term, the total extent of habitat that might be lost to renewable energy development will remain relatively low at the landscape level. Even if all current projects are built it is estimated that this would amount to 0.66% of the landscape and this is concentrated within the Bushmanland Arid Grassland vegetation type which is very widespread. Although the footprint of the Letsoai CSP 2 footprint is relatively high, the other proposed developments which form part of the greater

Letsoai and Enamandla project are concentrated within a relatively small area and their overall impact would be less than a more dispersed configuration. As such the overall cumulative impact of development in the area is still considered relatively low and a significant impact on biodiversity is not likely as the more sensitive elements of the landscape are currently outside of the development footprint of the PV and wind farms.

Due to the arid nature of the area, it is important that the mobility of fauna in the area is not compromised, as many arid-adapted fauna respond to the unpredictability of these systems by moving extensively across the landscape. These impacts can be reduced by maintaining the connectivity of the landscape and reducing the extent of electrified fencing or similar impenetrable obstacles. As such, if several of the CSP and PV plants of the Enamandla/Letsoai site are developed, then provision should be made to maintain some undeveloped corridors between some of the facilities to maintain the connectivity of the landscape and facilitate movement through this area.

Overall and with the suggested mitigation measures implemented, then the impact of the Letsoai CSP 2 development would be of low magnitude and of local significance only. As such, the development is considered acceptable from a terrestrial ecological perspective.

10 LITERATURE CITED

Alexander, G. & Marais, J. 2007. *A Guide to the Reptiles of Southern Africa*. Struik Nature, Cape Town.

Bates, M.F., Branch, W.R., Bauer, A.M., Burger, M., Marais, J., Alexander, G.J. & de Villiers, M. (eds.). 2014. Atlas and Red List of the Reptiles of South Africa, Lesotho and Swaziland. South African National Biodiversity Institute, Pretoria.

Branch W.R. 1998. *Field guide to snakes and other reptiles of southern Africa*. Struik, Cape Town.

Brownlie, S. 2005. Guideline for Involving Biodiversity Specialists in EIA Processes: Edition 1. CSIR Report No ENV-S-C 2005 053 C. Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town. 63 pp.

Clark, V.R., Barker, N.P., & Mucina, L. 2011. The Roggeveldberge – notes on a botanically hot area on a cold corner of the southern Great Escarpment, South Africa. *South African Journal of Botany* 77: 112-126.

Desmet, P and Marsh A. 2008. Namakwa District Biodiversity Sector Plan. Available from BGIS at <http://bgis.sanbi.org/namakwa/project.asp>.

De Villiers CC, Driver A, Clark B, Euston-Brown DIW, Day EG, Job N, Helme NA, Holmes PM, Brownlie S and Rebelo AB (2005) *Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape*. Fynbos Forum and Botanical Society of South Africa, Kirstenbosch.

Du Preez, L. & Carruthers, V. 2009. *A Complete Guide to the Frogs of Southern Africa*. Struik Nature., Cape Town.

Minter LR, Burger M, Harrison JA, Braack HH, Bishop PJ & Kloepfer D (eds). 2004. Atlas and Red Data book of the frogs of South Africa, Lesotho and Swaziland. SI/MAB Series no. 9. Smithsonian Institution, Washington, D.C

Mucina L. & Rutherford M.C. (eds) 2006. *The Vegetation of South Africa, Lesotho and Swaziland*. Strelitzia 19. South African National Biodiversity Institute, Pretoria.

Oosthuysen, E. & Holness, S. 2016. Northern Cape Critical Biodiversity Areas (CBA) Map. <https://cirrus.nmmu.ac.za/index.php/s/20fe43905396fca0025948bc0d3b514d>. Northern Cape Department of Environment and Nature Conservation & Nelson Mandela Metropolitan University.

Passmore, N.I. & Carruthers, V.C. 1995. *South African Frogs: A complete guide*. Witwatersrand University Press, Johannesburg. 322 pp.

Skinner, J.D. & Chimimba, C.T. 2005. The mammals of the Southern African Subregion. Cambridge University Press, Cambridge.

11 ANNEX 1. LIST OF PLANTS

List of plant species known from the broad area around the Letsoai site, based on observations from the site as well as the SANBI SIBIS database.

Family	Species	IUCN	Family	Species	IUCN
ACANTHACEAE	<i>Acanthopsis hoffmannseggiana</i>	LC	ACANTHACEAE	<i>Barleria rigida</i>	LC
ACANTHACEAE	<i>Blepharis mitrata</i>	LC	ACANTHACEAE	<i>Justicia thymifolia</i>	LC
ACANTHACEAE	<i>Monechma mollissimum</i>	LC	ACANTHACEAE	<i>Monechma spartioides</i>	LC
ACANTHACEAE	<i>Petalidium setosum</i>	LC	AIZOACEAE	<i>Aizoon asbestinum</i>	LC
AIZOACEAE	<i>Galenia africana</i>	LC	AIZOACEAE	<i>Galenia crystallina var. crystallina</i>	LC
AIZOACEAE	<i>Galenia fruticosa</i>	LC	AIZOACEAE	<i>Galenia papulosa</i>	LC
AIZOACEAE	<i>Galenia sarcophylla</i>	LC	AIZOACEAE	<i>Tetragonia arbuscula</i>	LC
AIZOACEAE	<i>Tetragonia reduplicata</i>	LC	AIZOACEAE	<i>Trianthema parvifolia var. parvifolia</i>	LC
AMARANTHACEAE	<i>Amaranthus praetermissus</i>	LC	AMARANTHACEAE	<i>Hermbstaedtia glauca</i>	LC
AMARANTHACEAE	<i>Sericocoma avolans</i>	LC	AMARYLLIDACEAE	<i>Brunsvigia comptonii</i>	LC
AMARYLLIDACEAE	<i>Brunsvigia herrei</i>	VU	AMARYLLIDACEAE	<i>Brunsvigia namaquana</i>	DDT
AMARYLLIDACEAE	<i>Hessea speciosa</i>	LC	ANACARDIACEAE	<i>Ozoroa dispar</i>	LC
ANACARDIACEAE	<i>Searsia burchellii</i>	LC	ANACARDIACEAE	<i>Searsia populifolia</i>	LC
APOCYNACEAE	<i>Fockea comaru</i>	LC	APOCYNACEAE	<i>Hoodia alstonii</i>	LC
APOCYNACEAE	<i>Hoodia gordonii</i>	DDD	APOCYNACEAE	<i>Microloma incanum</i>	LC
APOCYNACEAE	<i>Microloma sagittatum</i>	LC	APOCYNACEAE	<i>Pachypodium namaquanum</i>	LC
APOCYNACEAE	<i>Sarcostemma pearsonii</i>	LC	APOCYNACEAE	<i>Stapelia similis</i>	LC
ASPARAGACEAE	<i>Asparagus capensis var. capensis</i>	LC	ASPHODELACEAE	<i>Haworthia venosa subsp. tessellata</i>	LC
ASPHODELACEAE	<i>Trachyandra jacquiniana</i>	LC	ASPHODELACEAE	<i>Trachyandra laxa var. laxa</i>	LC
ASTERACEAE	<i>Arctotis erosa</i>	LC	ASTERACEAE	<i>Arctotis hirsuta</i>	LC
ASTERACEAE	<i>Arctotis leiocarpa</i>	LC	ASTERACEAE	<i>Berkheya canescens</i>	LC
ASTERACEAE	<i>Berkheya fruticosa</i>	LC	ASTERACEAE	<i>Berkheya spinosissima subsp. spinosissima</i>	LC
ASTERACEAE	<i>Cineraria canescens var. canescens</i>	LC	ASTERACEAE	<i>Dicoma capensis</i>	LC
ASTERACEAE	<i>Didelta carnosa var. carnosa</i>	LC	ASTERACEAE	<i>Dimorphotheca polyptera</i>	LC
ASTERACEAE	<i>Dimorphotheca sinuata</i>	LC	ASTERACEAE	<i>Eriocephalus ambiguus</i>	LC
ASTERACEAE	<i>Eriocephalus microphyllus var. pubescens</i>	LC	ASTERACEAE	<i>Eriocephalus scariosus</i>	LC
ASTERACEAE	<i>Eriocephalus spinescens</i>	LC	ASTERACEAE	<i>Euryops multifidus</i>	LC
ASTERACEAE	<i>Euryops subcarnosus subsp. vulgaris</i>	LC	ASTERACEAE	<i>Felicia hirsuta</i>	LC
ASTERACEAE	<i>Felicia muricata subsp. muricata</i>	LC	ASTERACEAE	<i>Felicia namaquana</i>	LC
ASTERACEAE	<i>Foveolina dichotoma</i>	LC	ASTERACEAE	<i>Gazania lichtensteinii</i>	LC
ASTERACEAE	<i>Geigeria pectidea</i>	LC	ASTERACEAE	<i>Geigeria vigintiquamea</i>	LC
ASTERACEAE	<i>Gorteria corymbosa</i>	LC	ASTERACEAE	<i>Gorteria diffusa subsp. diffusa</i>	LC
ASTERACEAE	<i>Gymnodiscus linearifolia</i>	LC	ASTERACEAE	<i>Helichrysum herniarioides</i>	LC
ASTERACEAE	<i>Helichrysum micropoides</i>	LC	ASTERACEAE	<i>Helichrysum pulchellum</i>	LC
ASTERACEAE	<i>Helichrysum pumilio subsp. pumilio</i>	LC	ASTERACEAE	<i>Helichrysum tomentosulum subsp. aromaticum</i>	LC
ASTERACEAE	<i>Helichrysum zeyheri</i>	LC	ASTERACEAE	<i>Hirpicium alienatum</i>	LC
ASTERACEAE	<i>Hirpicium echinus</i>	LC	ASTERACEAE	<i>Hirpicium integrifolium</i>	LC
ASTERACEAE	<i>Ifloga molluginoides</i>	LC	ASTERACEAE	<i>Kleinia cephalophora</i>	LC

Fauna & Flora Specialist EIA Report

ASTERACEAE	<i>Kleinia longiflora</i>	LC	ASTERACEAE	<i>Nidorella resedifolia</i> subsp. <i>resedifolia</i>	LC
ASTERACEAE	<i>Oncosiphon piluliferum</i>	LC	ASTERACEAE	<i>Osteospermum karrooicum</i>	LC
ASTERACEAE	<i>Osteospermum muricatum</i> subsp. <i>muricatum</i>	LC	ASTERACEAE	<i>Osteospermum pinnatum</i> var. <i>pinnatum</i>	LC
ASTERACEAE	<i>Othonna abrotanifolia</i>	LC	ASTERACEAE	<i>Othonna arbuscula</i>	LC
ASTERACEAE	<i>Othonna furcata</i>	LC	ASTERACEAE	<i>Othonna sedifolia</i>	LC
ASTERACEAE	<i>Pegolettia retrofracta</i>	LC	ASTERACEAE	<i>Pentzia argentea</i>	LC
ASTERACEAE	<i>Pentzia globosa</i>	LC	ASTERACEAE	<i>Pentzia lanata</i>	LC
ASTERACEAE	<i>Pteronia glauca</i>	LC	ASTERACEAE	<i>Pteronia glomerata</i>	LC
ASTERACEAE	<i>Pteronia mucronata</i>	LC	ASTERACEAE	<i>Pteronia scariosa</i>	LC
ASTERACEAE	<i>Pteronia sordida</i>	LC	ASTERACEAE	<i>Pteronia unguiculata</i>	LC
ASTERACEAE	<i>Senecio bulbifolius</i>	LC	ASTERACEAE	<i>Senecio eenii</i>	LC
ASTERACEAE	<i>Senecio niveus</i>	LC	ASTERACEAE	<i>Senecio pinguifolius</i>	LC
ASTERACEAE	<i>Senecio sarcoides</i>	LC	ASTERACEAE	<i>Senecio sisymbriifolius</i>	LC
ASTERACEAE	<i>Tripteris aghillana</i> var. <i>aghillana</i>	LC	ASTERACEAE	<i>Tripteris sinuata</i> var. <i>sinuata</i>	LC
ASTERACEAE	<i>Ursinia nana</i> subsp. <i>nana</i>	LC	ASTERACEAE	<i>Ursinia speciosa</i>	LC
ASTERACEAE	<i>Vernonia obionifolia</i> subsp. <i>obionifolia</i>	LC	BIGNONIACEAE	<i>Rhigozum trichotomum</i>	LC
BORAGINACEAE	<i>Codon royenii</i>	LC	BORAGINACEAE	<i>Heliotropium tubulosum</i>	LC
BORAGINACEAE	<i>Trichodesma africanum</i>	LC	BRASSICACEAE	<i>Heliophila carnosa</i>	LC
BRASSICACEAE	<i>Heliophila deserticola</i> var. <i>deserticola</i>	LC	BRASSICACEAE	<i>Heliophila deserticola</i> var. <i>micrantha</i>	LC
BRASSICACEAE	<i>Heliophila lactea</i>	LC	BRASSICACEAE	<i>Heliophila trifurca</i>	LC
BRASSICACEAE	<i>Lepidium trifurcum</i>	LC	BURSERACEAE	<i>Commiphora gracilifronsosa</i>	LC
CAMPANULACEAE	<i>Wahlenbergia meyeri</i>	LC	CAMPANULACEAE	<i>Wahlenbergia prostrata</i>	LC
CAPPARACEAE	<i>Boscia foetida</i> subsp. <i>foetida</i>	LC	CAPPARACEAE	<i>Cleome paxii</i>	LC
CARYOPHYLLACEAE	<i>Dianthus micropetalus</i>	LC	CARYOPHYLLACEAE	<i>Dianthus namaensis</i> var. <i>dinteri</i>	LC
CHENOPODIACEAE	<i>Salsola kalaharica</i>	LC	CHENOPODIACEAE	<i>Salsola rabieana</i>	LC
CHENOPODIACEAE	<i>Salsola tuberculata</i>	LC	COLCHICACEAE	<i>Ornithoglossum dinteri</i>	LC
COLCHICACEAE	<i>Ornithoglossum vulgare</i>	LC	CRASSULACEAE	<i>Adromischus diabolicus</i>	Rare
CRASSULACEAE	<i>Adromischus nanus</i>	LC	CRASSULACEAE	<i>Cotyledon orbiculata</i> var. <i>oblonga</i>	LC
CRASSULACEAE	<i>Cotyledon orbiculata</i> var. <i>orbiculata</i>	LC	CRASSULACEAE	<i>Crassula brevifolia</i> subsp. <i>brevifolia</i>	LC
CRASSULACEAE	<i>Crassula campestris</i>	LC	CRASSULACEAE	<i>Crassula corallina</i> subsp. <i>macrorrhiza</i>	LC
CRASSULACEAE	<i>Crassula cotyledonis</i>	LC	CRASSULACEAE	<i>Crassula deltoidea</i>	LC
CRASSULACEAE	<i>Crassula exilis</i> subsp. <i>exilis</i>	Rare	CRASSULACEAE	<i>Crassula exilis</i> subsp. <i>sedifolia</i>	LC
CRASSULACEAE	<i>Crassula garibina</i> subsp. <i>garibina</i>	LC	CRASSULACEAE	<i>Crassula macowaniana</i>	LC
CRASSULACEAE	<i>Crassula muscosa</i> var. <i>muscosa</i>	LC	CRASSULACEAE	<i>Crassula sericea</i> var. <i>sericea</i>	LC
CRASSULACEAE	<i>Crassula subaphylla</i> var. <i>subaphylla</i>	LC	CRASSULACEAE	<i>Crassula tenuipedicellata</i>	LC
CRASSULACEAE	<i>Crassula tomentosa</i> var. <i>glabrifolia</i>	LC	CRASSULACEAE	<i>Tylecodon reticulatus</i> subsp. <i>phyllopodium</i>	LC
CRASSULACEAE	<i>Tylecodon reticulatus</i> subsp. <i>reticulatus</i>	LC	CRASSULACEAE	<i>Tylecodon rubrovenosus</i>	LC
CUCURBITACEAE	<i>Coccinia rehmannii</i>	LC	CUCURBITACEAE	<i>Corallocarpus dissectus</i>	LC
CUCURBITACEAE	<i>Cucumis rigidus</i>	LC	CUCURBITACEAE	<i>Trochomeria debilis</i>	LC
CYPERACEAE	<i>Cyperus indecorus</i> var. <i>namaquensis</i>	LC	CYPERACEAE	<i>Isolepis hemiuncialis</i>	LC
EBENACEAE	<i>Diospyros austro-africana</i> var. <i>rubriflora</i>	LC	EBENACEAE	<i>Diospyros ramulosa</i>	LC
EUPHORBIACEAE	<i>Euphorbia dregeana</i>	LC	EUPHORBIACEAE	<i>Euphorbia gariepina</i> subsp. <i>gariepina</i>	LC

Fauna & Flora Specialist EIA Report

EUPHORBIACEAE	<i>Euphorbia mauritanica</i> var. <i>mauritanica</i>	LC	EUPHORBIACEAE	<i>Euphorbia spinea</i>	LC
FABACEAE	<i>Acacia erioloba</i>	Declining	FABACEAE	<i>Crotalaria meyeriana</i>	LC
FABACEAE	<i>Crotalaria pearsonii</i>	Rare	FABACEAE	<i>Crotalaria virgultalis</i>	LC
FABACEAE	<i>Indigostrum argyroides</i>	LC	FABACEAE	<i>Indigofera pechuelii</i>	LC
FABACEAE	<i>Lessertia depressa</i>	LC	FABACEAE	<i>Lotononis falcata</i>	LC
FABACEAE	<i>Lotononis fruticoides</i>	LC	FABACEAE	<i>Lotononis platycarpa</i>	LC
FABACEAE	<i>Lotononis rabenaviana</i>	LC	FABACEAE	<i>Melolobium microphyllum</i>	LC
FABACEAE	<i>Parkinsonia africana</i>	LC	FABACEAE	<i>Pomaria lactea</i>	LC
FABACEAE	<i>Requienia sphaerosperma</i>	LC	FABACEAE	<i>Tephrosia dregeana</i> var. <i>dregeana</i>	LC
FABACEAE	<i>Tephrosia limpopoensis</i>	LC	GERANIACEAE	<i>Monsonia parvifolia</i>	LC
GERANIACEAE	<i>Pelargonium carnosum</i> subsp. <i>carnosum</i>	LC	GERANIACEAE	<i>Pelargonium crithmifolium</i>	LC
GERANIACEAE	<i>Pelargonium spinosum</i>	LC	GERANIACEAE	<i>Pelargonium xerophyton</i>	LC
GERANIACEAE	<i>Sarcocaulon crassicaule</i>	LC	GISEKIACEAE	<i>Gisekia africana</i> var. <i>africana</i>	LC
HYACINTHACEAE	<i>Albuca namaquensis</i>	LC	HYACINTHACEAE	<i>Albuca setosa</i>	LC
HYACINTHACEAE	<i>Albuca spiralis</i>	LC	HYACINTHACEAE	<i>Daubinya namaquensis</i>	Thr*
HYACINTHACEAE	<i>Dipcadi gracillimum</i>	LC	HYACINTHACEAE	<i>Drimia intricata</i>	LC
HYACINTHACEAE	<i>Lachenalia polypodantha</i>	Rare	HYACINTHACEAE	<i>Lachenalia undulata</i>	LC
HYACINTHACEAE	<i>Massonia bifolia</i>	LC	HYACINTHACEAE	<i>Ornithogalum glandulosum</i>	LC
HYACINTHACEAE	<i>Ornithogalum pruinosum</i>	LC	HYACINTHACEAE	<i>Ornithogalum subcoriaceum</i>	LC
HYDNORACEAE	<i>Hydnora africana</i>	LC	IRIDACEAE	<i>Ferraria variabilis</i>	LC
IRIDACEAE	<i>Gladiolus orchidiflorus</i>	LC	IRIDACEAE	<i>Gladiolus saccatus</i>	LC
IRIDACEAE	<i>Hesperantha rupicola</i>	LC	IRIDACEAE	<i>Lapeirousia littoralis</i> subsp. <i>littoralis</i>	LC
IRIDACEAE	<i>Lapeirousia plicata</i> subsp. <i>plicata</i>	LC	IRIDACEAE	<i>Moraea unguiculata</i>	LC
IRIDACEAE	<i>Tritonia karooica</i>	LC	LAMIACEAE	<i>Acrotome pallescens</i>	LC
LAMIACEAE	<i>Salvia garipensis</i>	LC	LAMIACEAE	<i>Stachys flavescens</i>	LC
LAMIACEAE	<i>Stachys rugosa</i>	LC	MALVACEAE	<i>Hermannia affinis</i>	LC
MALVACEAE	<i>Hermannia confusa</i>	LC	MALVACEAE	<i>Hermannia disermifolia</i>	LC
MALVACEAE	<i>Hermannia gariepina</i>	LC	MALVACEAE	<i>Hermannia minutiflora</i>	LC
MALVACEAE	<i>Hermannia spinosa</i>	LC	MALVACEAE	<i>Hermannia stricta</i>	LC
MALVACEAE	<i>Hermannia tomentosa</i>	LC	MALVACEAE	<i>Hermannia vestita</i>	LC
MALVACEAE	<i>Hibiscus elliotiae</i>	LC	MENISPERMACEAE	<i>Antizoma miersiana</i>	LC
MESEMBRYANTHEMACEAE	<i>Antimima tuberculosa</i>	LC	MESEMBRYANTHEMACEAE	<i>Arenifera stylosa</i>	LC
MESEMBRYANTHEMACEAE	<i>Aridaria noctiflora</i> subsp. <i>straminea</i>	LC	MESEMBRYANTHEMACEAE	<i>Aspazoma amplexens</i>	LC
MESEMBRYANTHEMACEAE	<i>Brownanthus arenosus</i>	LC	MESEMBRYANTHEMACEAE	<i>Brownanthus nucifer</i>	LC
MESEMBRYANTHEMACEAE	<i>Brownanthus schenckii</i>	LC	MESEMBRYANTHEMACEAE	<i>Cephalophyllum fulleri</i>	Rare
MESEMBRYANTHEMACEAE	<i>Cephalophyllum parvibracteatum</i>	LC	MESEMBRYANTHEMACEAE	<i>Cephalophyllum staminodiosum</i>	Rare
MESEMBRYANTHEMACEAE	<i>Cheiridopsis denticulata</i>	LC	MESEMBRYANTHEMACEAE	<i>Conicosia elongata</i>	LC
MESEMBRYANTHEMACEAE	<i>Conophytum burgeri</i>	EN	MESEMBRYANTHEMACEAE	<i>Conophytum calculus</i> subsp. <i>vanzyltii</i>	LC
MESEMBRYANTHEMACEAE	<i>Conophytum limpidum</i>	NT	MESEMBRYANTHEMACEAE	<i>Conophytum marginatum</i> subsp. <i>harmoepense</i>	LC
MESEMBRYANTHEMACEAE	<i>Conophytum maughanii</i> subsp. <i>maughanii</i>	LC	MESEMBRYANTHEMACEAE	<i>Conophytum praesectum</i>	LC
MESEMBRYANTHEMACEAE	<i>Conophytum ratum</i>	VU	MESEMBRYANTHEMACEAE	<i>Conophytum tantillum</i> subsp. <i>eenkokerense</i>	Rare
MESEMBRYANTHEMACEAE	<i>Delosperma subincanum</i>	LC	MESEMBRYANTHEMACEAE	<i>Dinteranthus puberulus</i>	LC
MESEMBRYANTHEMACEAE	<i>Drosantherum albens</i>	LC	MESEMBRYANTHEMACEAE	<i>Drosantherum breve</i>	DDT
MESEMBRYANTHEMACEAE	<i>Drosantherum godmaniae</i>	DDT	MESEMBRYANTHEMACEAE	<i>Drosantherum hispidum</i>	LC

Fauna & Flora Specialist EIA Report

MESEMBRYANTHACEAE	<i>Drosantherum karrooense</i>	LC	MESEMBRYANTHACEAE	<i>Drosantherum lique</i>	LC
MESEMBRYANTHACEAE	<i>Drosantherum luederitzii</i>	LC	MESEMBRYANTHACEAE	<i>Drosantherum subcompressum</i>	LC
MESEMBRYANTHACEAE	<i>Ebracteola fulleri</i>	LC	MESEMBRYANTHACEAE	<i>Hereroa pallens</i>	LC
MESEMBRYANTHACEAE	<i>Hereroa teretifolia</i>	LC	MESEMBRYANTHACEAE	<i>Ihlenfeldtia excavata</i>	LC
MESEMBRYANTHACEAE	<i>Ihlenfeldtia vanzylii</i>	LC	MESEMBRYANTHACEAE	<i>Lapidaria margaretae</i>	LC
MESEMBRYANTHACEAE	<i>Lithops julii</i> subsp. <i>fulleri</i>	LC	MESEMBRYANTHACEAE	<i>Lithops olivacea</i>	VU
MESEMBRYANTHACEAE	<i>Mesembryanthemum crystallinum</i>	LC	MESEMBRYANTHACEAE	<i>Mesembryanthemum guerichianum</i>	LC
MESEMBRYANTHACEAE	<i>Phyllobolus latipetalus</i>	LC	MESEMBRYANTHACEAE	<i>Phyllobolus lignescens</i>	LC
MESEMBRYANTHACEAE	<i>Phyllobolus oculatus</i>	LC	MESEMBRYANTHACEAE	<i>Prenia tetragona</i>	LC
MESEMBRYANTHACEAE	<i>Psilocaulon articulatum</i>	LC	MESEMBRYANTHACEAE	<i>Psilocaulon coriarium</i>	LC
MESEMBRYANTHACEAE	<i>Psilocaulon subnodosum</i>	LC	MESEMBRYANTHACEAE	<i>Ruschia aggregata</i>	DDT
MESEMBRYANTHACEAE	<i>Ruschia centrocapsula</i>	LC	MESEMBRYANTHACEAE	<i>Ruschia cradockensis</i> subsp. <i>triticiformis</i>	LC
MESEMBRYANTHACEAE	<i>Ruschia divaricata</i>	LC	MESEMBRYANTHACEAE	<i>Ruschia kenhardtensis</i>	LC
MESEMBRYANTHACEAE	<i>Ruschia muricata</i>	LC	MESEMBRYANTHACEAE	<i>Ruschia robusta</i>	LC
MESEMBRYANTHACEAE	<i>Ruschia spinosa</i>	LC	MESEMBRYANTHACEAE	<i>Schwantesia marlothii</i>	LC
MESEMBRYANTHACEAE	<i>Schwantesia ruedebuschii</i>	LC	MESEMBRYANTHACEAE	<i>Stomatium fulleri</i>	LC
MESEMBRYANTHACEAE	<i>Trichodiadema littlewoodii</i>	LC	MESEMBRYANTHACEAE	<i>Trichodiadema obliquum</i>	DDT
MOLLUGINACEAE	<i>Hypertelis salsoloides</i> var. <i>salsoloides</i>	LC	MOLLUGINACEAE	<i>Limeum aethiopicum</i> var. <i>intermedium</i>	LC
MOLLUGINACEAE	<i>Limeum arenicolum</i>	LC	MOLLUGINACEAE	<i>Limeum myosotis</i> var. <i>myosotis</i>	LC
MOLLUGINACEAE	<i>Pharnaceum croceum</i>	LC	MOLLUGINACEAE	<i>Pharnaceum viride</i>	LC
MOLLUGINACEAE	<i>Psammotropha obtusa</i>	LC	MOLLUGINACEAE	<i>Suessenguthiella scleranthoides</i>	LC
MONTINIACEAE	<i>Montinia caryophyllacea</i>	LC	MORACEAE	<i>Ficus cordata</i> subsp. <i>cordata</i>	LC
MORACEAE	<i>Ficus ilicina</i>	LC	NEURADACEAE	<i>Grielum humifusum</i> var. <i>humifusum</i>	LC
NEURADACEAE	<i>Grielum sinuatum</i>	LC	OXALIDACEAE	<i>Oxalis annae</i>	LC
PEDALIACEAE	<i>Rogeria longiflora</i>	LC	PLUMBAGINACEAE	<i>Dyerophytum africanum</i>	LC
POACEAE	<i>Aristida adscensionis</i>	LC	POACEAE	<i>Aristida congesta</i> subsp. <i>congesta</i>	LC
POACEAE	<i>Aristida diffusa</i> subsp. <i>burkei</i>	LC	POACEAE	<i>Aristida engleri</i> var. <i>engleri</i>	LC
POACEAE	<i>Brachiaria glomerata</i>	LC	POACEAE	<i>Cenchrus ciliaris</i>	LC
POACEAE	<i>Cladoraphis spinosa</i>	LC	POACEAE	<i>Ehrharta calycina</i>	LC
POACEAE	<i>Ehrharta pusilla</i>	LC	POACEAE	<i>Enneapogon cenchroides</i>	LC
POACEAE	<i>Enneapogon desvauxii</i>	LC	POACEAE	<i>Enneapogon scaber</i>	LC
POACEAE	<i>Eragrostis nindensis</i>	LC	POACEAE	<i>Fingerhuthia africana</i>	LC
POACEAE	<i>Leucophrys mesocoma</i>	LC	POACEAE	<i>Panicum arbusculum</i>	LC
POACEAE	<i>Schmidtia kalahariensis</i>	LC	POACEAE	<i>Stipagrostis amabilis</i>	LC
POACEAE	<i>Stipagrostis anomala</i>	LC	POACEAE	<i>Stipagrostis brevifolia</i>	LC
POACEAE	<i>Stipagrostis ciliata</i> var. <i>capensis</i>	LC	POACEAE	<i>Stipagrostis obtusa</i>	LC
POACEAE	<i>Stipagrostis uniplumis</i> var. <i>uniplumis</i>	LC	POLYGALACEAE	<i>Polygala leptophylla</i> var. <i>armata</i>	LC
POLYGALACEAE	<i>Polygala pungens</i>	LC	POLYGALACEAE	<i>Polygala seminuda</i>	LC
PORTULACACEAE	<i>Anacampseros baeseckei</i>	LC	PORTULACACEAE	<i>Anacampseros filamentosa</i> subsp. <i>namaquensis</i>	LC
PORTULACACEAE	<i>Avonia albissima</i>	LC	PORTULACACEAE	<i>Avonia herreana</i>	VU
PORTULACACEAE	<i>Avonia papyracea</i> subsp. <i>namaensis</i>	LC	PORTULACACEAE	<i>Avonia papyracea</i> subsp. <i>papyracea</i>	LC
PORTULACACEAE	<i>Avonia quinaria</i> subsp. <i>alstonii</i>	LC	PORTULACACEAE	<i>Avonia recurvata</i> subsp. <i>recurvata</i>	LC
PORTULACACEAE	<i>Ceraria fruticulosa</i>	LC	PORTULACACEAE	<i>Ceraria namaquensis</i>	LC
PORTULACACEAE	<i>Portulaca kermesina</i>	LC	RUBIACEAE	<i>Anthospermum spathulatum</i> subsp. <i>spathulatum</i>	LC

Fauna & Flora Specialist EIA Report

RUBIACEAE	<i>Kohautia caespitosa subsp. brachyloba</i>	LC	SANTALACEAE	<i>Thesium lineatum</i>	LC
SAPINDACEAE	<i>Pappea capensis</i>	LC	SCROPHULARIACEAE	<i>Aptosimum procumbens</i>	LC
SCROPHULARIACEAE	<i>Aptosimum spinescens</i>	LC	SCROPHULARIACEAE	<i>Aptosimum tragacanthoides</i>	LC
SCROPHULARIACEAE	<i>Hebenstretia parviflora</i>	LC	SCROPHULARIACEAE	<i>Jamesbrittenia aridicola</i>	LC
SCROPHULARIACEAE	<i>Jamesbrittenia ramosissima</i>	LC	SCROPHULARIACEAE	<i>Manulea nervosa</i>	LC
SCROPHULARIACEAE	<i>Peliostomum leucorrhizum</i>	LC	SCROPHULARIACEAE	<i>Zaluzianskya diandra</i>	LC
SCROPHULARIACEAE	<i>Zaluzianskya sanorum</i>	LC	SOLANACEAE	<i>Lycium cinereum</i>	LC
SOLANACEAE	<i>Solanum burchellii</i>	LC	SOLANACEAE	<i>Solanum giftbergense</i>	LC
SOLANACEAE	<i>Solanum namaquense</i>	LC	URTICACEAE	<i>Forsskaolea candida</i>	LC
VERBENACEAE	<i>Chascanum garipense</i>	LC	VISCACEAE	<i>Viscum rotundifolium</i>	LC
ZYGOPHYLLACEAE	<i>Augea capensis</i>	LC	ZYGOPHYLLACEAE	<i>Sisyndite spartea</i>	LC
ZYGOPHYLLACEAE	<i>Tribulus pterophorus</i>	LC	ZYGOPHYLLACEAE	<i>Tribulus terrestris</i>	LC
ZYGOPHYLLACEAE	<i>Zygophyllum retrofractum</i>	LC	ZYGOPHYLLACEAE	<i>Zygophyllum simplex</i>	LC

12 ANNEX 1. LIST OF MAMMALS

List of mammals which are likely to occur in the vicinity of the Letsaoi site. Habitat notes and distribution records are based on Skinner & Chimimba (2005), while conservation status is from the IUCN Red Lists 2015 and South African Red Data Book for Mammals (Friedmann & Daly 2004).

Scientific Name	Common Name	Status	Habitat	Likelihood
Macroscledidea (Elephant Shrews):				
<i>Macroscelides proboscideus</i>	Round-eared Elephant Shrew	LC	Species of open country, with preference for shrub bush and sparse grass cover, also occur on hard gravel plains with sparse boulders for shelter, and on loose sandy soil provided there is some bush cover	High
<i>Elephantulus rupestris</i>	Western Rock Elephant Shrew	LC	Rocky koppies, rocky outcrops or piles of boulders where these offer sufficient holes and crannies for refuge.	Low
Tubulentata:				
<i>Orycteropus afer</i>	Aardvark	LC	Wide habitat tolerance, being found in open woodland, scrub and grassland, especially associated with sandy soil	Confirmed
Hyracoidea (Hyaxes)				
<i>Procavia capensis</i>	Rock Hyrax	LC	Outcrops of rocks, especially granite formations and dolomite intrusions in the Karoo. Also erosion gullies	High
Lagomorpha (Hares and Rabbits):				
<i>Pronolagus rupestris</i>	Smith's Red Rock Rabbit	LC	Confined to areas of krantzes, rocky hillsides, boulder-strewn koppies and rocky ravines	Low
<i>Lepus capensis</i>	Cape Hare	LC	Dry, open regions, with palatable bush and grass	High
Rodentia (Rodents):				
<i>Hystrix africaeaustralis</i>	Cape Porcupine	LC	Catholic in habitat requirements.	Confirmed
<i>Petromus typicus</i>	Dassie Rat	LC	Mountainous regions and inselbergs, where they are confined to rocky outcrops and live in crevices or piles of boulders	Low
<i>Xerus inauris</i>	South African Ground Squirrel	LC	Open terrain with a sparse bush cover and a hard substrate	Confirmed
<i>Graphiurus platyops</i>	Rock Dormouse	LC	Rocky terrain, under the exfoliation on granite bosses, and in piles of boulders	High
<i>Rhodomys pumilio</i>	Four-striped Grass Mouse	LC	Essentially a grassland species, occurs in wide variety of habitats where there is good grass cover.	High
<i>Aethomys namaquensis</i>	Namaqua Rock Mouse	LC	Catholic in their habitat requirements, but where there are rocky koppies, outcrops or boulder-strewn hillsides they use these preferentially	Low
<i>Parotomys brantsii</i>	Brants' Whistling Rat	LC	Associated with a dry sandy substrate in more arid parts of the Nama-karoo and Succulent Karoo. Species selects areas of low percentage of plant cover and areas with deep sands.	High
<i>Parotomys littledalei</i>	Littledale's Whistling Rat	LC	Riverine associations or associated with Lycium bushes or Psilocaulon absimile	High
<i>Desmodillus auricularis</i>	Cape Short-tailed Gerbil	LC	Tend to occur on hard ground, unlike other gerbil species, with some cover of grass or karroid bush	High

Fauna & Flora Specialist EIA Report

<i>Gerbillurus paeba</i>	Hairy-footed Gerbil	LC	Gerbils associated with Nama and Succulent Karoo preferring sandy soil or sandy alluvium with a grass, scrub or light woodland cover	High
<i>Gerbillurus tytonis</i>	Dune Hairy-footed Gerbil	LC	Hot dry areas on shifting red sand dunes	High
<i>Gerbilliscus leucogaster</i>	Bushveld Gerbil	LC	Predominantly associated with light sandy soils or sandy alluvium	Moderate
<i>Gerbilliscus brantsii</i>	Higheld Gerbil	LC	Sandy soils or sandy alluvium with some cover of grass, scrub or open woodland	Moderate
<i>Saccostomus campestris</i>	Pouched Mouse	LC	Catholic habitat requirements, commoner in areas where there is a sandy substrate.	High
<i>Malacothrix typica</i>	Gerbil Mouse	LC	Found predominantly in Nama and Succulent Karoo biomes, in areas with a mean annual rainfall of 150-500 mm.	High
<i>Petromyscus collinus</i>	Pygmy Rock Mouse	LC	Arid areas on rocky outcrops or koppies with a high rock cover	High
Primates:				
<i>Papio ursinus</i>	Chacma Baboon	LC	Can exploit fynbos, montane grasslands, riverine courses in deserts, and simply need water and access to refuges.	Low
<i>Cercopithecus mitis</i>	Vervet Monkey	LC	Most abundant in and near riparian vegetation of savannahs	Low
Eulipotyphla (Shrews):				
<i>Crocidura cyanea</i>	Reddish-Grey Musk Shrew	LC	Occurs in relatively dry terrain, with a mean annual rainfall of less than 500 mm. Occur in karroid scrub and in fynbos often in association with rocks.	High
Carnivora:				
<i>Proteles cristata</i>	Aardwolf	LC	Common in the 100-600mm rainfall range of country, Nama-Karoo, Succulent Karoo Grassland and Savanna biomes	High
<i>Caracal caracal</i>	Caracal	LC	Caracals tolerate arid regions, occur in semi-desert and karroid conditions	High
<i>Felis silvestris</i>	African Wild Cat	LC	Wide habitat tolerance.	High
<i>Panthera pardus</i>	Leopard	NT	Wide habitat tolerance, associated with areas of rocky koppies and hills, mountain ranges and forest	Low
<i>Felis nigripes</i>	Black-footed cat	VU	Associated with arid country with MAR 100-500 mm, particularly areas with open habitat that provides some cover in the form of tall stands of grass or scrub.	High
<i>Genetta genetta</i>	Small-spotted genet	LC	Occur in open arid associations	High
<i>Suricata suricatta</i>	Meerkat	LC	Open arid country where substrate is hard and stony. Occur in Nama and Succulent Karoo but also fynbos	Confirmed
<i>Cynictis penicillata</i>	Yellow Mongoose	LC	Semi-arid country on a sandy substrate	Confirmed
<i>Herpestes pulverulentus</i>	Cape Grey Mongoose	LC	Wide habitat tolerance	High
<i>Atilax paludinosus</i>	Marsh Mongoose	LC	Associated with well-watered terrain, living in close association with rivers, streams, marshes, etc.	Low
<i>Vulpes chama</i>	Cape Fox	LC	Associated with open country, open grassland, grassland with scattered thickets and coastal or semi-desert scrub	High
<i>Canis mesomelas</i>	Black-backed Jackal	LC	Wide habitat tolerance, more common in drier areas.	High

Fauna & Flora Specialist EIA Report

<i>Otocyon megalotis</i>	Bat-eared Fox	LC	Open country with mean annual rainfall of 100-600 mm	High
<i>Aonyx capensis</i>	African Clawless Otter	LC	Predominantly aquatic and do not occur far from permanent water	Low
<i>Ictonyx striatus</i>	Striped Polecat	LC	Widely distributed throughout the sub-region	High
Rumanantia (Antelope):				
<i>Tragelaphus strepsiceros</i>	Greater Kudu	LC	Broken, rocky terrain with a cover of woodland and a nearby water supply.	Low
<i>Oryx gazella</i>	Gemsbok	LC	Open arid country	Confirmed
<i>Sylvicapra grimmia</i>	Common Duiker	LC	Presence of bushes is essential	High
<i>Antidorcas marsupialis</i>	Springbok	LC	Arid regions and open grassland.	Confirmed
<i>Raphicerus campestris</i>	Steenbok	LC	Inhabits open country,	Confirmed
<i>Oreotragus oreotragus</i>	Klipspringer	LC	Closely confined to rocky habitat.	Low

13 ANNEX 2. LIST OF REPTILES

List of reptiles which are likely to occur at the Letsaoi site, based on the SARCA database and site observations. Conservation status is from Bates et al. (2014).

Family	Genus	Species	Subspecies	Common name	Red list category	No. records
<i>Agamidae</i>	<i>Agama</i>	<i>atra</i>		Southern Rock Agama	Least Concern	2
<i>Agamidae</i>	<i>Agama</i>	<i>knobeli</i>		Knobel's Rock Agama	Not listed	1
<i>Colubridae</i>	<i>Dasypeltis</i>	<i>scabra</i>		Rhombic Egg-eater	Least Concern	2
<i>Colubridae</i>	<i>Dipsina</i>	<i>multimaculata</i>		Dwarf Beaked Snake	Least Concern	3
<i>Colubridae</i>	<i>Telescopus</i>	<i>beetzii</i>		Beetz's Tiger Snake	Least Concern	2
<i>Cordylidae</i>	<i>Karusasaurus</i>	<i>polyzonus</i>		Karoo Girdled Lizard	Least Concern	2
<i>Cordylidae</i>	<i>Platysaurus</i>	<i>capensis</i>		Namaqua Flat Lizard	Least Concern	1
<i>Elapidae</i>	<i>Aspidelaps</i>	<i>lubricus</i>	<i>lubricus</i>	Coral Shield Cobra	Not listed	6
<i>Elapidae</i>	<i>Naja</i>	<i>nigricincta</i>	<i>woodi</i>	Black Spitting Cobra	Least Concern	1
<i>Elapidae</i>	<i>Naja</i>	<i>nivea</i>		Cape Cobra	Least Concern	2
<i>Gekkonidae</i>	<i>Chondrodactylus</i>	<i>angulifer</i>	<i>angulifer</i>	Common Giant Ground Gecko	Least Concern	4
<i>Gekkonidae</i>	<i>Chondrodactylus</i>	<i>bibronii</i>		Bibron's Gecko	Least Concern	7
<i>Gekkonidae</i>	<i>Goggia</i>	<i>lineata</i>		Striped Pygmy Gecko	Least Concern	4
<i>Gekkonidae</i>	<i>Pachydactylus</i>	<i>goodi</i>		Good's Gecko	Vulnerable	1
<i>Gekkonidae</i>	<i>Pachydactylus</i>	<i>latirostris</i>		Quartz Gecko	Least Concern	8
<i>Gekkonidae</i>	<i>Pachydactylus</i>	<i>weberi</i>		Weber's Gecko	Least Concern	1
<i>Gerrhosauridae</i>	<i>Cordylosaurus</i>	<i>subtessellatus</i>		Dwarf Plated Lizard	Least Concern	1
<i>Lacertidae</i>	<i>Meroles</i>	<i>suborbitalis</i>		Spotted Desert Lizard	Least Concern	7
<i>Lacertidae</i>	<i>Nucras</i>	<i>tessellata</i>		Western Sandveld Lizard	Least Concern	1
<i>Lacertidae</i>	<i>Pedioplanis</i>	<i>lineoocellata</i>	<i>lineoocellata</i>	Spotted Sand Lizard	Least Concern	1
<i>Lacertidae</i>	<i>Pedioplanis</i>	<i>namaquensis</i>		Namaqua Sand Lizard	Least Concern	8
<i>Lamprophiidae</i>	<i>Boaedon</i>	<i>capensis</i>		Brown House Snake	Least Concern	3
<i>Lamprophiidae</i>	<i>Psammophis</i>	<i>namibensis</i>		Namib Sand Snake	Least Concern	1
<i>Lamprophiidae</i>	<i>Psammophis</i>	<i>notostictus</i>		Karoo Sand Snake	Least Concern	1
<i>Lamprophiidae</i>	<i>Pseudaspis</i>	<i>cana</i>		Mole Snake	Least Concern	1

Fauna & Flora Specialist EIA Report

<i>Scincidae</i>	<i>Acontias</i>	<i>namaquensis</i>		Namaqua Legless Skink	Least Concern	1
<i>Scincidae</i>	<i>Acontias</i>	<i>tristis</i>		Namaqua Dwarf Legless Skink	Least Concern	23
<i>Scincidae</i>	<i>Trachylepis</i>	<i>occidentalis</i>		Western Three-striped Skink	Least Concern	1
<i>Scincidae</i>	<i>Trachylepis</i>	<i>sulcata</i>	<i>sulcata</i>	Western Rock Skink	Least Concern	2
<i>Scincidae</i>	<i>Trachylepis</i>	<i>variegata</i>		Variegated Skink	Least Concern	2
<i>Testudinidae</i>	<i>Homopus</i>	<i>signatus</i>		Speckled Padloper	Vulnerable	1
<i>Testudinidae</i>	<i>Psammobates</i>	<i>tentorius</i>	<i>verroxii</i>	Verrox's Tent Tortoise	Not listed	13
<i>Typhlopidae</i>	<i>Rhinotyphlops</i>	<i>schinzi</i>		Schinz's Beaked Blind Snake	Least Concern	1
<i>Viperidae</i>	<i>Bitis</i>	<i>arietans</i>	<i>arietans</i>	Puff Adder	Least Concern	1
<i>Viperidae</i>	<i>Bitis</i>	<i>caudalis</i>		Horned Adder	Least Concern	2

14 ANNEX 3. LIST OF AMPHIBIANS

List of amphibians which are likely to occur in the vicinity of the Letsaoi site. Based on the Frogmap database, while conservation status is from the IUCN Red Lists 2014 and Minter et al. (2004).

Family	Genus	Species	Common name	Red list category	No. records
<i>Bufonidae</i>	<i>Vandijkophrynus</i>	<i>gariepensis</i>	Karoo Toad (subsp. gariepensis)	Not listed	2
<i>Bufonidae</i>	<i>Vandijkophrynus</i>	<i>robinsoni</i>	Paradise Toad	Least Concern	10
<i>Microhylidae</i>	<i>Phrynomantis</i>	<i>annectens</i>	Marbled Rubber Frog	Least Concern	7
<i>Pipidae</i>	<i>Xenopus</i>	<i>laevis</i>	Common Platanna	Least Concern	1
<i>Pyxicephalidae</i>	<i>Amietia</i>	<i>fuscigula</i>	Cape River Frog	Least Concern	4
<i>Pyxicephalidae</i>	<i>Cacosternum</i>	<i>namaquense</i>	Namaqua Caco	Least Concern	3
<i>Pyxicephalidae</i>	<i>Strongylopus</i>	<i>springbokensis</i>	Namaqua Stream Frog	Vulnerable	2
<i>Pyxicephalidae</i>	<i>Tomopterna</i>	<i>delalandii</i>	Cape Sand Frog	Least Concern	3