

ISSUES AND CONCERNS REPORT (ICR) – THE PROPOSED UPGRADING OF SANI PASS ROAD (P318): PHASE 2

SECTION 1: ISSUES AND COMMENTS RECEIVED DURING THE SCOPING PHASE OF THE EIA

The Issues and Concerns Report (ICR) as per the tables below consolidate all input received throughout the Public Participation Process (PPP) to date, including comments received after distribution of the Background Information Document (BID), Draft and Final Scoping Reports. Comments made during meetings are excluded as these are captured in the minutes of the meetings. The ICR intends to summarise the comments received through filtering out and flagging the issues and concerns raised by the IAP. The ICR aids the identification (Scoping Phase) and evaluation (Impact Assessment Phase) of the impacts identified by all Interested and Affected Parties (IAPs). Note that the ICR has been amended to include comments received after submission of the Final Scoping Report (Final SR) to the authorities.

Note that the 'Response and Reference' column of this ICR contains responses to enquiries and reference to where specific issues have been captured in the Draft Scoping Report (Draft SR) and Final SR and post submission of the FSR.

Refer to **Appendix D7** for a complete record of all the comments received. Comments made during the stakeholder meetings are captured in the meeting minutes in **Appendix D4** and have not been included in this register. The tools used to inform Interested and Affected Parties (IAP) of the project and the way in which comments from IAPs were solicited is noted in the PPP Chapter of the Draft and Final Scoping Report.

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 1. | Mr Kobus vd Berg, Chairman: Southern Drakensberg Community Tourism Organisation (SDCTO) | IAP001 (16/05/2008) | Finds it rather disconcerting that Arcus GIBB's e-mail of 16 May 2008 was the first correspondence received. | Noted. Chapter 5.6 provides an overview of the PPP. |
| 2. | | | Congratulates Arcus GIBB on the display of Notices in/around Underberg/Himeville; especially the very conspicuous one outdoors at the KwaSani Municipal offices. Trusts that same has been similarly propagated [especially in iSizulu] to the communities in other parts of KwaSani [e.g. along the Himeville / Nottingham Rd route] | Noted. Chapter 5.6.7 provides details on various locations of where notice boards were displayed. Notice boards were displayed in English, isiZulu and Sesotho. |
| 3. | | | Reference in the notice to the upgrade" from a gravel to a hardened surface" conflicts with first-hand consulting at the meeting of 7April 2008 (at Giant's Cup Tea Garden with WESSA, SDCTO and others), where the Project Engineer emphatically stated that his brief was for an "all-weather surface" | The Department of Transport (DoT) brief to the Project Engineer was to provide an "all-weather hardened surface", but during the mentioned meeting Mr Eddy Gademan advised that the project was still in the preliminary design phase and engineers would consider a variety of "all-weather surface" options and also combinations thereof along the route, some of which would include 'non-hardened' surfaces. They would advise DoT on the outcome of their technical evaluation of the |

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| | | | | viability of the various road surface options. Refer to Chapter 3 for further details on project alternatives. |
| 4. | | | Concerned that in accordance with the Notice Boards comments are to be registered in writing while some IAPs in the area are illiterate and requests that this be taken cognisance of. | Arcus GIBB provided for participation by illiterate people through liaison meetings with community leaders, e.g. Meeting if Kwapitela Community Leaders, liaison with Councillor Ndlovu, KwaSani Municipality (who met with Stepmore Location and Mgotsheni communities – Ref IAP43). An opportunity for verbal comments will also be presented at the Open Door and Public Information Sharing Meeting which will be held on 6 December 2008 and during which IAPs will be offered the opportunity to provide verbal comment. |
| 5. | | | They have been involved in many EIAs undertaken in this area, prior to Arcus GIBB's involvement on the Sani Pass Phase 2 upgrade, and are therefore unsure which comments of their's Arcus GIBB have on record. | The proposed Sani Pass Phase 2 (and 3) Upgrade Project is a 'new' and separate EIA application with the Department of Environmental Affairs and Tourism (DEAT) and therefore a separate Scoping and EIA Process is undertaken, as a result of which IAPs must duly register their issues and concerns on this particular project separately. Arcus GIBB is however in possession of copies of relevant EIA reports concerning the Sani Pass Phase 1 upgrade, for which construction is in progress and the proposed Sani Border Post Relocation Project, for which the outcome of the environmental authorisation process is still awaited. Issues identified during these EIA's have been screened and considered to establish whether they have any relevance to the Phase 2 project, and where they did were considered and will be assessed. |
| 6. | | | Requested a (electronic) copy of the project plan (even if just a 'proposed plan') of all the tasks/deliverables/milestones on the way forward | All registered IAPs are kept informed of any opportunities for further public involvement. Chapter 7 provides an overview of the role-out of the PPP and key milestones. |
| 7. | Mr Stuart Mclean, Manager Sani Valley Lodge and Ecological Tour Guide | IAP002 (16/05/2008) | States that they were dismayed at the combination of Phase 2 and 3, as the terrain and state of the road is such that you cannot possibly consider them in the same process. Believes that there is no local support for Phase 3, while people may have less objections to Phase 2. Concerned that combining the two phases may be a ploy to gain support for Phase 3. | Noted. Engineers are well aware that challenges along the Phase 2 and 3 routes vary considerably and that a 'one size fits all' approach would not be feasible. Engineers are therefore investigating various technical options and alternatives and combinations thereof for the upgrade along the route. While the engineering design is still in progress, Chapter 3 describes options that are being considered during the preliminary design phase. |
| 8. | Mr Johan van Jaarsveld, | IAP003 | Concerned that the proposed project would have a detrimental | Noted. Refer to Chapter 6.5.2 and 6.6.4 |

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| | Tourist Operator | (20/05/2008) | impact on his tourist operation business, to the extent that he might need to close it down. | |
| 9. | | | Concerned that his issues and concern will 'fall on deaf ears'. | Noted. Refer to Chapter 5.9 |
| 10. | | | Advised that 'we the locals' and in fact most people do not know what the reason for the project is. | All IAPs were provided with a copy of a Background Information Document (BID) which briefly explains and presents the proponent's (i.e. the Department of Transport's) motivation for the project. Also refer to Chapter 6.2. |
| 11. | | | Questions the legitimacy of the procedure and the mandate for this project. Believes that the real reason for the project will remain secret until such a time when it can not be turned around any longer. | Noted. Refer to Chapter 6.2 |
| 12. | | | Questions whether, as may be the motivation, the road upgrade would encourage trade from and to Lesotho or encourage tourism. Believes that in both cases this will not happen as there are only two wool trucks in the shearing season of sheep and goats. | Noted. Refer to Chapter 6.2 |
| 13. | | | Explains that the only people to trade with at the top of Sani Pass are rural Basotho who live peaceful and protected lives. To 'make a big tar road' will introduce theft and corruption and change their lives and affect their culture. | Noted. Refer to Chapter 6.5.6 |
| 14. | | | In two years he has not had a single tourist who wants the Pass to be tarred. | Noted. Refer to Chapter 6.5.2 |
| 15. | | | Concerned that the EIA consultants are appointed to steer the project in the 'government's interest'. | Arcus GIBB has been appointed as the independent Environmental Assessment Practitioner for this formal Scoping and EIA Process and as such is bound by the NEMA EIA Regulation to remain independent and unbiased for the duration of the EIA Process. |
| 16. | | | Concerned that the project is a <i>fait accompli</i> as it is politically motivated. (Explained that years ago politicians visited the area and confirmed that the project will happen.) | Noted. Refer to Chapter 6.2 |
| 17. | | | Concerned that taxpayers will be victimised as hundreds of million Rands of taxpayers' money would be spent on the project. | Noted. Refer to Chapter 2.2 and 6.6. |
| 18. | Concerned that the IAPs "are simply the considered irritants and the nuisance factor". | Noted. Refer to Chapter 5.6. Arcus GIBB is following due process to ensure that all comments and concerns raised are incorporated in the Scoping Report and discussed and where possible addressed in the EIA Report, for the authorities to take into consideration | | |

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| | | | | during their environmental authorisation process. Both the draft Scoping and EIA reports will be presented to all registered IAPs for their review prior to finalisation thereof. IAPs must inform Arcus GIBB within the stipulated response period should they feel that their original comments were mistaken or misrepresented and provide relevant corrected. |
| 19. | Mr. Tom Dallaway, representative of Seaforth Conservancy | IAP004 (23/05/2008) | Completely opposed to blasting of the Sani Pass. | Noted. Refer to Chapter 2.3 |
| 20. | | | Completely opposed to the tarring of the Sani Pass. | Noted. Refer to Chapter 6.9.1. |
| 21. | Mr. MA Hankinson, private, long standing resident | IAP005 (26/05/2008) | Advises that in practical terms it would seem to be far more expedient to supply Makhotlong (at the top of the Pass) with its own clinic and services, instead of expecting the long expensive and dangerous trip (especially in winter) down the Sani Pass to Underberg. | Noted. |
| 22. | | | Advised that the Underberg Clinic has been waiting for improved size and facilities for well over 10 years and is therefore not equipped for an increase in patients. | Noted. |
| 23. | | | States that the cost and bad environmental impact is not worth the present plan. | Noted. |
| 24. | | | Pointed out that the Sani Pass (upper reaches) is so ill maintained at present and asks the question as to who would maintain the hardened surface once the potholes and the undermining of the hardened surface starts. | Noted. Project Engineers have indicated that they would include specification for ongoing maintenance in their engineering plans. DoT advised that they would be responsible for ongoing maintenance of the Road. Refer to Chapter 6.9.2 for further information. |
| 25. | Mr. T. Pfothenauer | IAP007 | Enquired what the reason was for the change in the EIA consultant. | Arcus GIBB received a request from DoT to provide a proposal and associated quotation for undertaking the EIA for Phase 2 and 3 of the Sani Pass upgrade and was appointed subsequent to heading this request. The previous EIA consultant opted to not submit a proposal. |
| 26. | Ms. Christina Curry, Senior Herbarium Technician & Acting Curator, Bews Herbarium, School of Biology and Conservation Sciences, University of KwaZulu-Natal, Pietermaritzburg | IAP008 | Expressed her concern for the fauna and flora that may be affected by the widening and the construction phase of the road. (Explained that the Bews Herbarium has the most extensive plant collection of the Drakensberg). | Noted. Refer to Chapter 6.4. |
| 27. | | | As a tourist in her own country, she expressed her grave concern about what the upgrade may mean for the sense of the place of the Sani Pass. | Noted. Refer to Chapter 6.5.1. |
| 28. | Mr. McGillycuddy, Local | IAP009 | Compared to schedules provided in the BID for the Sani Pass | Noted. |

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| | Committee Member of Maloti Drakensberg Transfrontier Project, Mahwaqa Mountain Oribi Conservation Trust. Honorary Officer of Ezemvelo-KZN Wildlife. Parish of Drakensberg Parish Council | (02/06/2008) | Phase 1 project, DoT has failed to complete Phase 1 in the required time and therefore he does not believe that the DoT has the capacity to complete Phase 2. | |
| 29. | | | Objects to Phase 2. | Noted. Refer to Chapter 5.9 and 6.9.1. |
| 30. | | | Does not believe that DoT has the ability to upgrade the P318 to the required specification. | Noted. |
| 31. | | | Does not believe that the funding will be available. Explains that changing circumstances in South Africa necessitates funding being made more readily available for hospitals, schools, welfare and crime control | Noted. |
| 32. | | | Believes that the World Bank will curtail funding of the uKhahlamba Drakensberg Park if Sani Pass is so disturbed and tarred. | Noted. Refer to Chapter 6.5.2 |
| 33. | | | Believes that If the uKhahlamba Drakensberg Park loses its World Heritage status it will no longer have the aura of a "must do" tourist attraction. | Noted. Refer to Chapter 6.5.2 |
| 34. | | | Does not believe that it is feasible to complete the project by 2010. | Noted. Refer to Chapter 6.9.3 |
| 35. | | | Does not believe that visiting tourists for FIFA World Cup would be interested to visit Sani Pass. | Noted. |
| 36. | | | Believes that the Sani Pass will lose its current challenge and allure as a 4x4 and quad bike driving experience and adventures will then seek such experience elsewhere. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 37. | | | Objects to a tarred road, as it will result in local transport providers losing employment due to the increased accessibility to Sani Top and the Kingdom of Lesotho. | Noted. Refer to Chapter 5.9, 6.5.2 and 6.9.1 |
| 38. | | | Objects to being deceived by authorities into the prospect of the tarred Pass being a paying trade route between Maseru and places along the N3 from Ladysmith to Durban. | Noted. |
| 39. | | | Sees no prospect of funds gained from such transport paying for upgrade of P318 this century. | Noted. |
| 40. | | | Concerned that the Kwa Sani Municipality will show a lack of concern for keeping the Sani Pass clean, considering their inability to keep the area around their buildings in good order and road verges along the P126 and in and around Underberg and Himeville clean. | The custodian and managing authority of the uKhahlamba Drakensberg Park and therefore responsible for litter control within the park is Ezemvelo KZN Wildlife. DoT owns the road servitude and is therefore responsible for upgrades and maintenance of the road. |
| 41. | Sales of 4X4 vehicles would be negatively affected if opportunities for use of such vehicles are lost with associated | Noted. | | |

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| | | | loss in government revenue from associated taxes, which will in turn increase sales tax on such vehicles. | |
| 42. | | | Once the road is tarred the safety of tourists using it is a concern, particularly as the nearest high-grade hospital is in Pietermaritzburg. | Noted. Refer to Chapter 6.5.7 |
| 43. | | | Objects to a faster thoroughfare and throughput of tourists as this would deprive Himeville and Underberg of many bed-nights (and all associated income) due to a slightly higher volume of tourists passing through faster in each directions. | Noted. Refer to Chapter 6.5.2 |
| 44. | | | Objects to the loss of jobs from moving away from manual maintenance of the road. | Noted. Refer to Chapter 6.6.3 |
| 45. | Mr. M Clark, Farmer of Hilltop Farm, Sani Road | IAP010 (04/06/2008) | The Sani Pass route is a major tourist attraction and hard surfacing it will destroy the whole ethos of the Pass and its tourist potential. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 46. | Himeville | | Ice in winter will force the closure of the road, if it is hard surfaced. | Noted. Refer to Chapter 6.10 |
| 47. | (Associated with the Pass since 1959) | | Widening of the route will cause extensive damage to the surrounding area. | Noted. Refer to Chapter 6.4 |
| 48. | | | An improved road will lead to higher vehicle speeds which will lead to an increase in accidents. (Notes that already vehicles drive at too fast speeds) | Noted. Refer to Chapter 6.10 |
| 49. | | | There is concern that the road would not be maintained. | Noted. Refer to Chapter 6.9.2 |
| 50. | | | Noted that a bad tar road is worse than a bad dirt road. | Noted. Refer to Chapter 6.9.2 |
| 51. | | | Does not object to improvement of the road up to the present border post, but states that the road should be retained as a gravel road between the border post and the summit. | Noted. Refer to Chapter 6.9.1 |
| 52. | | | Argues that while the Sani Pass upgrade would only benefit a few hundred people, upgrading of the Loteni Road would benefit thousands. | Noted. |
| 53. | | | Advises that his comments at this stage are of general nature as further comments can only be made once the EIA reports and design plans are tabled. | Noted. Further opportunities for public comment will indeed be provided as the EIA unfolds and plans develop. Refer to Chapter 7 for further details. |
| 54. | Mr. Philip Grant, Professional Hiking Guide, and Ms. Christeen Grant, Nature and Cultural Guide. Southern | IAP011 (09/06/2008) | There are a number of advantages inherent in the <i>status quo</i> of the Sani Pass road, which should be incorporated in the proposed upgrade. | Noted. Refer to Chapter 2.3 |
| 55. | | | The very rough state of the road keeps travelling speeds low, which is probably the main reason why there are so few | Noted. Refer to Chapter 6.10 |

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| | | | accidents on Sani Pass. | |
| 56. | Secrets Hiking and Backpacking | | The low travelling speeds enable visitors and tourists to enjoy all the delights of Sani Pass, (in the same way that low speed limits are enforced in a game reserve such as the Kruger National Park). | Noted. Refer to Chapter 6.4.3 and 6.10 |
| 57. | | | Because all vehicles have to travel slowly, the impatience of drivers in other vehicles travelling behind tourist vehicles is minimised. | Noted. Refer to Chapter 6.4.3 |
| 58. | | | The winding route ensures that a new vista is presented around almost every corner, helping to make the drive or hike exciting for those experiencing the Pass for the first time. | Noted. Refer to Chapter 6.5.1 |
| 59. | | | At present the river and stream crossings in the form of 'drifts' which allows water to flow over the road are a delight and attraction and add to the 'sense of place', particularly the one known as "the Fountain of Eternal Youth" as it is a very popular tourist attraction. This 'sort of stream crossing' in the form of a concreted drift could be a model for other Stream crossing as an alternative to constructing expensive bridges. (Noted that the 'Fountain of Eternal Youth' drift is never impassable even after heavy rain.) | Noted. Refer to Chapter 2.3 and 6.5.1 |
| 60. | | | Slow vehicle speeds make it safer for regular local pedestrian users and hikers, especially between the two border posts. (Explains that the road is used regularly as a hiking route and by Basotho people on foot who sometimes even herd livestock) | Noted. Refer to Chapter 6.5.7 and 6.10 |
| 61. | | | The narrow width of the existing road enables visitors and tourists to have a close up view of the diversity of plants, birds, animals and wildflowers from the vehicle. | Noted. Refer to Chapter 6.4 |
| 62. | | | There is little doubt that the Sani Pass needs to be upgraded in some way - however, it is vital that this be done with extreme sensitivity, vision and care; bearing in mind the pristine mountain terrain it crosses (arguably some of the finest mountain scenery in Southern Africa) and the facts that the road passes through a World Heritage Site and that the Sani Pass is an important tourist destination in its own right. | Noted. |
| 63. | | | Although there has been a road through the Sani Valley for many years, so far it has made a minimal visual impact on the surrounding scenery, and blends in reasonably well. | Noted. Refer to Chapter 6.7 |

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| 64. | | | Recommends that the Sani Pass upgrade should be modelled on the Swartberg Pass between Oudtshoorn and Prince Albert in the Cape, which was hand built in the 1880's and is still in perfectly adequate 100 years later. Noted that this Pass blends in well with the environment and is also regarded as a tourist attraction. | Noted. Refer to Chapter 2.3 and 6.7 |
| 65. | | | The Phase 2 Sani Pass Upgrade should be built by hand as far as possible in order to preserve the rustic character of the Pass, make it possible that there would be little need to deviate from present route whereby sensitive plants and picturesque places of interest near and next to the road verges be preserved and cause less disruption to traffic flow. | Noted. |
| 66. | | | Road verge stabilisation can be achieved with use of gabions | Noted. |
| 67. | | | Building the road by hand would result in the highest number of people employment during construction. | Noted. Refer to Chapter 6.6.3 |
| 68. | | | Once the project has been completed, ongoing maintenance and alien vegetation clearing would be required along the road reserve, which would provide permanent employment opportunities for local people. | Noted. Refer to Chapter 6.6.3 |
| 69. | | | Because of the high rainfall in the area, 'washaways' are almost inevitable from time to time and whatever road surface is decided upon should be easily repairable. | Noted. |
| 70. | | | An annual maintenance budget is required. (Noted that too often roads are "forgotten about after completion, and are allowed to steadily deteriorate to a state where they become worse than before the upgrade." E.g. huge potholes are evident on the tar road between Mokhotlong and Buthe Buthe in Lesotho, i.e. 'Roof of Africa Route') | Noted. Refer to Chapter 6.9.2 |
| 71. | | | If absolutely necessary, a rough concreted hard surface could be provided in a colour (tinted) to match the surrounding soil and rock colours and 'ribbed' with low corrugations (similar to 'rumble strips' on highways), to help the break up of ice. | Noted. Refer to Chapter 3.8 and Chapter 6.9.1 |
| 72. | | | Is of the opinion that "Mass tourism" will be the inevitable result of an "insensitive" road upgrade, which "is the last thing Lesotho needs, as it will destroy the very thing that tourists want to experience", namely a "cross cultural" type of experience, which is the "type of tourism" which "brings the most benefits to the greatest number of people". The | Noted. Refer to Chapter 6.5 and Chapter 6.6 |

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| | | | implications and impact of the road upgrade on the societies and present tourism infrastructure existing in Lesotho has not been adequately taken into account. (Explains that at present tourism into the Mokhotlong district of Lesotho is 'low impact' community based tourism, which makes little impact on the traditional tribal structures and village life of the mountain areas of Lesotho) | |
| 73. | | | The statement in the BID that Underberg is the nearest market and health care centre for people living in Mokhotlong district is incorrect, as a good hospital and many shops are available in Mokhotlong. | Noted. |
| 74. | | | The statement in the BID that there is a possible danger of avalanches along the route to be upgraded is incorrect, as there is never enough snow for long periods and avalanches have never been recorded anywhere. | The avalanches risk referred to in the BID were for rock avalanches, with the most notable risk area at the 'Zig-zag' close to the summit. |
| 75. | | | The vehicle speeds intended for design specification, are unrealistic. (Explains that even on existing two lane tarmac surface roads in Lesotho, it is only possible to achieve an average speed of 30km per hour.) | Noted. |
| 76. | | | Is of the opinion that the idea of developing the Sani Pass as part of an Maseru to Durban trade route, which would be a quick, viable alternative to driving around on the existing highway infrastructure, is naive to say the least, bearing in mind the average speeds achievable in Lesotho. (Explains that the Mokhotlong District of Lesotho is now well served by roads to the west and the importance of the Sani Pass as a trade route has clearly diminished over the past 40 years.) | Noted. Refer to Chapter 6.2 |
| 77. | | | Believes that road users are 'almost unanimous' in favour of preserving the character of the existing road. (Based on a WESSA survey amongst users of the Sani Pass.) | Noted. Refer to Chapter 6.6.4 and 6.9.1 |
| 78. | | | Concerned that "once the Sani Pass has been insensitively 'upgraded' and the unique character of the existing road has been changed, it will be gone forever" and with it a part of our heritage | Noted. Refer to Chapter 6.5.1 and 6.8.2 |
| 79. | | | Concerned over whether their comments will be heard and conveyed to the decision makers. | Refer to the response under Item no 18 above. |
| 80. | | | The decision makers should visit the Pass as well as Eastern Lesotho to gain a first hand Sani Pass experience before they | Arcus GIBB arranged a day-trip along the full route of the Sani Pass and accompanied Mr Chucheka Tivani and Mr Danie |

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| | | | make decisions that affects the Pass. | Smith, the current appointed EIA Case Officers, of the Sensitive Environment Division, DEAT Head Office. Arcus GIBB will also pass this comment on as a recommendation to the relevant authorities. |
| 81. | Mr. Andrew Claxton, local property owner and frequent Sani Pass visitor | IAP012 (10/06/2008) | Appears concerned that the proposed development will result in a loss of the sense of place: "I cannot believe there will one day be bulldozers traversing the tight bends of Gray's Corner." | Noted. Refer to Chapter 6.5.1 |
| 82. | | | Greatly 'intrigued' (concerned) about the engineering challenges that would face the contractors. | Noted. Refer to Chapter 2.3 |
| 83. | | | There is concern, to see how the people of Mokhotlong and surrounding areas will eventually benefit from the tarring of the Pass. | Noted. Refer to Chapter 6.5 and 6.6 |
| 84. | Mr. John Wallace, private, resident in Western Cape, past resident of KwaZulu-Natal, visitor to Sani Pass | IAP013 (15/06/2008) | Tarring the road may have an opposite effect on tourism as, although somewhat paradoxically, the allure, adventure, experience and memorability of Sani Pass owed much to the thrill, hazards and/or discomforts posed by the 4x4 journey will be lost. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 85. | | | Tarring the road will inevitably result in a 'crowded mountain', due to the prospect of higher levels of traffic clogging the road, which in turn will result in 'crowds destroying the solitude at the summit'. This is hardly conducive to attracting the kind of tourist that sought out the Pass previously. | Noted. Refer to Chapter 6.5 |
| 86. | | | Loss of rare opportunity for tourists of 'sheer indulgence of space' and 'being more in tune with our surrounds', without 'stumbling across people' or 'distraction provided by people' like one would at tourist attractions in Europe. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 87. | | | Enquires as to who would ensure that the road is maintained. With the decay in SA's road infrastructure being all too evident, finds it hard to believe that the road up Sani Pass will be maintained any different. | Refer to the response under Item no 24 above. |
| 88. | | | Enquires as to who would be responsible for disaster management, as the risk of accidents are likely to escalate, due to the increased traffic and by the hazards posed by ordinary motor vehicles attempting to negotiate the Pass during the winter, when snow and ice are prevalent. | The Sani Pass falls within the jurisdiction of Sisonke District Municipality and KwaSani Local Municipality, who will be responsible for disaster management. Noted. Refer to Chapter 6.10 |
| 89. | | | If local economic development is ultimately the objective of the proposal, enquires in what way the benefits would be captured and whether they would arise on the SA or the Lesotho side of | Refer to Chapter 2.2 for the motivation for the project as provided by the project proponent. Also refer to Chapter 6.2 |

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| 90. | | | the border. Is of the opinion that the land on the Lesotho side of the border is sparsely populated (by indigent people) and offers little appeal from a tourism point of view. | Noted. |
| 91. | | | Is of the opinion that from the SA side, tarring the road will encourage more day-trippers, who are less likely to avail themselves of local accommodation. | Noted. Refer to Chapter 6.5.2 |
| 92. | | | Questions that, if in fact the objective is not local economic development, but rather to open up and improve the flow of traffic between SA and Lesotho, why the money is not spent instead on improving the other national routes and thereby eliminating the downside risk that pertains to Sani Pass. | Noted. Refer to Chapter 6.2 |
| 93. | | | If the objective is rather to open up and improve the flow of traffic between SA and Lesotho; why is the money is not spent instead on improving other national routes, thereby eliminating the negative risks of upgrading Sani Pass? | Noted. Refer to Chapter 6.2 |
| 94. | Ms Margaret Cloete, Visitor to the Pass | IAP015 (19/06/2008) | Objects to the upgrade of the existing Sani Pass (R318) from gravel to an all weather hardened surface. | Noted. Refer to Chapter 6.9.1 and 5.9 |
| 95. | | | Enquires whether a standard form/letter is available that she could forward to 4X4 club members and her friends visiting the area. | Arcus GIBB registered Ms Cloete on the IAPs register and as such forwarded the BID and associated response sheet to her. |
| 96. | WESSA – Sani Branch (Note: The WESSA submission included comments from their Sani Branch along with results of a Tourism Survey which they had conducted. As part of the Tourism Survey, they had developed a questionnaire of which the printed and distributed 2000 between November 2007 and March 2008. The questionnaire was distributed to tour | IAP016 (19/06/2008) | Tarring the road will change and/or destroy the unique and special “sense of place”, “spiritual dimension”, “precious wilderness commodity”, “Sani Pass Experience” and the internationally renowned “Sani Pass brand”, which encompasses the following: <ul style="list-style-type: none"> • The spectacular scenery • The soaring views • The feeling of isolation and space • The rough road • The achievement of reaching the top, give the place a spiritual dimension • The wilderness feel and experience • The extraordinary history of the route • The unique flora, fauna and geology • Rare opportunity to stop anywhere along the road to admire plant and bird species (some of these being rare) at | Noted. Refer to Chapter 6.5.1 |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | operators and tourists and copies were availed at the South African border post. | | <p>close range</p> <ul style="list-style-type: none"> • Rare opportunity to stop along the road to drink from a pristine waterfall • One of the finest journey experiences in southern Africa • The access route to the top of the Pass, allows many people the privilege to experiencing the wilderness without destroying it • Relatively ease of access by a large number of people | |
| 97. | WESSA received 685 questionnaires back, | | Destroying the “Sani Pass Experience” will cheat South Africans of their heritage. | Noted. Refer to Chapter 6.5.1 and 6.8 |
| 98. | which they then analysed to compile the results report) | | Destroying the “the Sani Pass Experience” and/or “the Sani Pass brand” as a tourism product will damage tourism, as it will deprive visitors of an experience for which many people are willing to travel thousands of miles for. WESSA is of the opinion that it would not be unlike removing Table Mountain from Cape Town or diverting the Zambezi river away from Victoria Falls. | Noted. Refer to Chapter 6.5.1 |
| 99. | | | <p>Tarring the road will have negative implications for the very sensitive ecology and what is understood to be “the most diverse flora of the entire KwaZulu-Natal Drakensberg”, such as:</p> <ul style="list-style-type: none"> • Reduction in runoff adsorption and associated increase runoff speeds and therefore erosion • Increased volume of visitors will lead to an inevitable increase in environmentally unfriendly behaviour such as: <ul style="list-style-type: none"> - Destruction of plant life and associated bird habitat near the road - Large increase in litter - Uncontrolled hiking - Uncontrolled off-road vehicular activity, especially by quad bikers who will no longer get their thrills from the Pass itself. | Noted. Refer to Chapter 6.3 and 6.4 |
| 100. | | | Questions whether the argument that tarring the road would drastically reduce the erosion and runoff from the road is valid and contends that the opposite is true, due to the fact that runoff speeds from tarred roads are higher due to a reduction in adsorption and associated increase in runoff speeds. Contests that the same results could be largely achieved by | Noted. Refer to Chapter 4.5 and 6.3 |

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| | | | improving the drainage of the existing road at a fraction of the cost and disruptions than what would result from tarring the road. WESSA would like to see clear study results on this issue. | |
| 101. | | | <p>Contents that the main motivation, i.e. the unlocking of the Sani Pass as a trade route between Maseru and Durban through provision of a 150km shorter route, is ill conceived and will turn out to be unfounded. This is as:</p> <ul style="list-style-type: none"> • The proposed route from Maseru via Thaba Tseka to Sani Top will include 8 steep and winding mountain passes of between 2225m and 3240m, as a result of which negotiating this route will take longer than the existing flatter route via the Free State and the N3 • Vehicles using the new route will most likely use more fuel. • In addition, the top section of the Sani Pass, according to the Phase 1 EIA, will remain a narrow road and will not be open to large trucks or large buses. | Noted. Refer to Chapter 2.2 and 6.2 |
| 102. | | | The BID for phase 2 now states that the road is necessary to provide access to health care facilities for people in Mokhotlong, when in fact Mokhotlong has a fully functional hospital and Underberg has only a primary health care clinic. | Refer to the response under Item no 73 above. |
| 103. | | | EIA must include an extensive socio-economic study, to establish the feasibility, desirability and cost-effectiveness of such a multi-million rand and potentially destructive project. | Noted. Refer to Chapter 4.6, 4.7, 6.5 and 6.6 |
| 104. | | | <p>Tarring the road would be disastrous for the local tourism economy, as many tourists would simply not come to this area should the road be tarred. By tarring the road tourism operators in the whole region would lose the very concrete and growing Sani Pass market opportunity, on account of a series of vague, scientifically unfounded (no studies have been undertaken) and unconvincing arguments and promises as to how tarring the road would bring benefits to them. WESSA supports their concerns by the following:</p> <ul style="list-style-type: none"> • Over the last 12 years, tourism has grown to become one of the major contributors to the local KwaSani economy, and will soon surpass local agriculture, which is on the decline • Tourism brings in substantial income and has created a | Noted. Refer to Chapter 4.7, 6.5 and 6.6 |

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| | | | <p>large number of employment opportunities at exactly the time when farming as an employer was in decline</p> <ul style="list-style-type: none"> • The Sani Pass in its current state is a major factor in the exponential growth of tourism • The Sani Pass has, as acknowledged in various tourism forums, including the Sisonke District Municipality forum, itself become an internationally recognised “brand name” without ANY active marketing • Besides the tour operators who directly benefit from 4x4 tours up the Sani Pass, accommodation establishments at all market levels attribute a large percentage of their bed-nights to the desire of tourists to ascend the Sani Pass by whatever means (i.e. To get the “Sani Pass experience” as it currently is) • A host of other services such as vehicle mechanics, tyre suppliers, and all businesses who support the various accommodation establishments are similarly dependant to varying degrees on the Sani Pass as it is now • The economy also benefits from the multiplier effect of increased incomes in the tourism sector • Small scale village tourism in Lesotho is also slowly developing in the Eastern Highlands based on the area as it is now • The Tourism Survey results unequivocally show an overwhelming desire by tourists to keep the Sani Pass as a dirt road. | |
| 105. | | | There is no evidence of any Cost-Benefit Analysis having been undertaken to substantiate the motivation for tarring of the Sani Pass. | Noted. Refer to Chapter 1.3.2, 4.6.2 and 6.6. |
| 106. | | | <p>Contends that public money could and should be far better spent addressing the many challenges our society faces, e.g.:</p> <ul style="list-style-type: none"> • Tarring the road from Nottingham Road to Himeville would bring far greater benefit to the KwaSani Municipal area than tarring the Sani Pass at a fraction of the cost • There must be many other deserving projects locally or in other parts of the country, which would bring far more benefit for the amount spent. | Noted. |

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| 107. | | | The Sani Pass would be an incredibly difficult project technically due to the steepness of the route, the unstable rock, weather conditions, very low temperatures and severe overnight freezing which would cause any road surface constructed to break up quickly. | Noted. Refer to Chapter 2.3, 6.9, 6.10 and 6.11 |
| 108. | | | WESSA requires detailed plans, which explains how the 'incredible' technical difficulties of the project along the various sections of the road would be surmounted, to be submitted for their detailed review and comment. | Noted. Refer to Chapter 2.3 and Layout Figures 1-8 |
| 109. | | | The route must be kept open at all times as many people's livelihoods depend on this. Closure may only be tolerated for a couple of hours at a time in any day, and will have to be negotiated with current users to ensure minimum disruption to normal traffic flows. | Noted. Refer to Chapter 6.9. |
| 110. | | | Concerned whether there is a reasonable prospect of a Sani Pass tar road being maintained, particularly as the KZN DoT has demonstrated in the past a complete inability to maintain the existing dirt track. | Noted. Refer to Chapter 6.9.2 |
| 111. | | | Concerned that poor or lack of maintenance of a tar road could result in a situation where the tarred road deteriorates to the point where the road has to be closed, particularly as a potholed tar road is far worse to drive on than a potholed dirt road. Notes the following examples of deteriorated tarred road resulting from inadequate maintenance: <ul style="list-style-type: none"> • The Oxbow / Mokhotlong road in Lesotho • The local Drakensberg Gardens road • The road between Maclear and Tsolo or the Oliviershoek Pass (further a field). | Noted. Refer to Chapter 6.9.2 |
| 112. | | | Committed funding needs to be built into the post-project lifecycle for ongoing maintenance to ensure that any sort of upgrade be cost effective and sustainable. | Noted. |
| 113. | | | WESSA promotes deployment of a dedicated permanently employed maintenance team who make use of low tech labour intensive methods on a low-tech road, rather than a high-tech imprudent and/or unsustainable solution with exorbitant Total Cost of Ownership [TCO] over its expected usable life. This is as they believe it to be a win-win solution as it would: <ul style="list-style-type: none"> • Be a better maintenance option | Noted. |

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| | | | <ul style="list-style-type: none"> • Create sustainable jobs for local people • Ensure the best future for the road. | |
| 114. | | | <p>Concerned that a tarred surface will lead to a substantial increase in speed and will be more treacherous in icy winter conditions (particularly the windy and steep section at the summit), which they believe will result in the accident (and death) rate growing massively. WESSA advises that over the years very few fatal accidents have occurred on the Sani Pass for the following reasons:</p> <ul style="list-style-type: none"> • The nature of the road surface, ensures that drivers travel at very low speeds and need to concentrate, which in turn allows for vastly increased reaction time • Drivers are allowed to stop anywhere along the route • A gravel road has a rough surface which means that tyres retain some purchase on the road. | Noted. Refer to Chapter 6.10 |
| 115. | | | An iced up tarred road will become lethal under the steep and narrow road conditions, particularly near the summit of the Pass. | Noted. Refer to Chapter 6.10 |
| 116. | | | Believes that the most reasonable conclusion is that 'having an all-weather road safely passable for as many days in a year as possible' would best be achieved by keeping the bulk of the inclined section of the Pass is a rough dirt surface. | Noted. Refer to Chapter 3 and 6.9.1 |
| 117. | | | <p>Concerned (in a major way) that the required widening of the road in association with road specifications, as described by the project engineers (during meetings and discussions), would destroy at least a couple of metres either side of the existing road. As the road is fringed in most places with vegetation close to its current edge, this 'fringe of vegetation would be lost, which in turn would result in:</p> <ul style="list-style-type: none"> • Loss of part of the charm of the road and thus of the associated immense value to tourism • Loss of the great ecological value from the fringe of vegetation in itself. | Noted. Refer to 6.4 |
| 118. | | | <p>Plans to remove plants, keep them in greenhouses and then put them back once the road construction is complete, while being of admirable intent, are totally unrealistic. This is as:</p> <ul style="list-style-type: none"> • Humans cannot manage nature | Noted. |

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| | | | <ul style="list-style-type: none"> • There is an irrefutable track record of failures that proves this • Most indigenous plants are very difficult to transplant, particularly sensitive to locality/conditions and most will probably die • The sheer volume of vegetation also means the project is impractical as it would be prohibitively expensive and far too time consuming to try and use this technique on the entire road. | |
| 119. | | | <p>Should any construction be finally approved, WESSA requires previously proven measures to be implemented to minimize damage. This is imperative considering the extensive period it will take for verge vegetation to regenerate to its current state. Measures should include:</p> <ul style="list-style-type: none"> • Appointment of a monitoring team to keep an eye specifically on this issue and be proactive in ensuring that key areas are not disturbed and/or destroyed. • Special training for all operators of machinery in creating minimum impact and in recognizing which plant species are of particular significance. | Noted. Such construction issues will be considered and managed in the Construction Environmental Management Programme that will be compiled in the Impact Assessment Phase. |
| 120. | | | <p>Concerned that the decision to upgrade the Sani Pass road was taken at a political level without due thought or consultation with local people, and that there have never been any factually substantiated or convincing reasons put forward as to why such a project is needed. This view is based on the fact that a sod-turning ceremony was held long before any approvals were gained and that no local people were invited or consulted prior to this. This is most patently evident from the speech by the Min of Transport JT Radebe, MP, on 18 July 2006, and published at http://www.info.gov.za/speeches/2006/06072712451001.htm</p> | Noted. See Chapter 2.2, 6.9.1 and 7. |
| 121. | | | <p>Convinced that a full need and desirability study will reveal that there is no need for a tarred road and that it would be found that neither is it desirable nor practicable. WESSA therefore fully supports the idea that “a full need and desirability study” will be conducted as part of the EIA process, as was stated in the BID. A full Cost/Benefit analysis needs to be undertaken to ascertain:</p> | Noted. Both a Social Impact Assessment and a Resource Economics Study have been initiated as part of the EIA. See Chapter 1.3.2, 4.6, 6.5, 6.6, 7.4.2 and 7.4.3.3. |

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| | | | <ul style="list-style-type: none"> • Whether there will indeed be any benefits overall and precisely identify what these might be • What the likely final cost of the project will be • Whether the likely benefits (if any) are worthy of the capital outlay or whether that money could be better spent in other ways to achieve the ends sought by DoT. | |
| 122. | | | <p>Believe that a wider ranging social study, including factual socio-economic aspects, should be conducted as part of such a need and desirability study. Independent researchers need to look at the current status of tourism, both in the southern Drakensberg and eastern Lesotho. Full research needs to be done to determine potential impacts of the project amongst others, but in no way limited to:</p> <ul style="list-style-type: none"> • The actual monetary value of tourism within the areas • The number of jobs directly and indirectly dependent on tourism • The centrality of Sani Pass in the product • The future growth paths under the scenarios of: <ul style="list-style-type: none"> - Leave Sani Pass as a 4x4 track - Sani Pass as an upgraded dirt road - Sani Pass as a tarred road • Non-monetary factors. | Noted. Both a Social Impact Assessment and a Resource Economics Study have been initiated as part of the EIA. See Chapter 1.3.2, 4.6, 6.5, 6.6, 7.4.2 and 7.4333. |
| 123. | | | Submits that, without due and proper regard for, and satisfactory resolution of all of the matters and/or concerns that WESSA recorded in this submission (IAP016, 19/06/2008), no Record of Decision in respect of this project can be made in a just and lawful way, as required by the Constitution Section 33 "Just Administrative Action". | Noted. Arcus GIBB is bound to ensure the EIA is undertaken in compliance with the relevant legislation. |
| 124. | Mr. Russell Suchet Mrs. Simone Suchet, Sani Branch WESSA (Chairman: Bill Small), Tourist operators at the Sani Pass for 16 years. | IAP017 (19/06/2008) | <p>Contents that tarring the route from Good Hope to Mokhotlong would totally alter and threaten the unique Sense of Place and the almost spiritual experience (which Mr & Ms Suchet described in detail). Tarring the route would impact on the increases the "intrusiveness" by a very high factor, while 'a dirt road' is considered the least intrusive way for creating vehicle access. (Uses the example that Outeniqua Pass is a beautiful tarred road Pass in its own right, but that no one travels the route to enjoy wilderness experience, like they would if they travel the old dirt road passes such as the Montagu Pass and</p> | Noted. Refer to Chapter 4.6, 4.7, 4.9, 6.5, 6.6, 6.8 and 7.4.2. |

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| | | | the Swartberg Pass. Also compares tarring the Sani Pass to tarring roads within the Kruger National Park and Addo Elephant Park). | |
| 125. | | | The intrinsic value of the Sani Pass can be demonstrated by the Swartberg Pass, which is a national monument and has similar features to the Sani Pass, such as wilderness and lack of human intervention. | Noted. Refer to Chapter 4.6, 4.7, 4.9, 6.4, 6.5, 6.6, 6.8 and 7.4.2. |
| 126. | | | <p>Concerned that some of the special and unique feature and attractions to the Sani Pass would be lost. The Sani Pass should be preserved because in a state as close as possible to its current state, as:</p> <ul style="list-style-type: none"> • The Pass in its current state is a place they love, is precious and special to them and which adds value to their lives and those of visitors to the Pass • Environment should be preserved for future generations • A wide variety of indigenous woody vegetation has established along the sides of the road, which in turn attracts many bird species. This would be lost if the road is widened. • Some of the stream crossings in the form of a drift or causeway, with water flowing over the road are a special and rare attraction, as it allows visitors to drive or walk through, stop in and/or drink from the stream. • Sharp corners, switchbacks and narrow passages are attractions | Noted. Refer to Chapter 2.3, 3, 4.6, 4.7, 4.9, 6.4, 6.5, 6.6, 6.8 and 7.4.2. |
| 127. | | | <p>Destroying the ‘Sense of Place’ and ‘The Majestic Sani Pass’ brand will severely harm the type of successful tourism and destroy the evident present and potential future potential growth in local eco tourism in South Africa and Lesotho. This is as:</p> <ul style="list-style-type: none"> • They witness an increased interest and massive escalation growth in tourism, due to the nature of the current Pass. (Provided description) • Many outside people have arrived in the district over recent years to invest large sums of money into local tourism ventures. • They have personally experienced a steady increase in occupancy rates for the tours and accommodation they | Noted. Refer to Chapter 4.7, 6.5, 6.6 and 74.2. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | <p>offer.</p> <ul style="list-style-type: none"> • While in 1992 there had been only one tour operator on Sani Pass, there are now 4 major tour operators along with a number of smaller specialist operators (e.g. birding, botanical). Vehicle setting capacity offered by tour operators has increased from 32 to 220 on any one day. • They estimate that 20 000 to 30 000 tourists go up the Sani Pass annually on organized tours. • The Sani Pass currently is central to the growth in the tourism industry and supports the local economy directly and indirectly by a variety of support services. • Their own company has been pioneering traditional community tourism development in the Matsoaing area near Mokhotlong in joint venture with local Mosotho, which has, with the assistance of the Maloti Drakensberg Transfrontier Project, become a model for community tourism in Lesotho. Since starting this venture in 2005 to date they have arranged over 130 tours with over 670 mostly foreign visitors. Numbers of visitors and associated income to local Mosotho is broadening and growing with a growth of 47% between 2006/7 and 2007/8. • Tourism thus makes a substantial contribution to the economy at Sani Top (a minimum of R100 000 – R150 000 per annum) • The growth in tourism has been based on Sani Pass as a dirt track, not as a tarred road. • Tarring the road will reduce the level of organised tourism substantially and will have adverse consequences for the Sani Top economy. • There is no evidence that the proposed tarring will boost tourism. • There is a tar road from Leribe to Katse Dam, a place which should be a major attraction in its own right. It would be interesting to see actual statistics from Katse Lodge, but anecdotal evidence suggests that their occupancy rates are extremely low. • Namibia is a prime example of how leaving good quality dirt roads has led to a tourism boom. | |

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| 128. | | | <p>Contends that eco-tourism has the potential to bring in far more sustainable and evenly spread financial and other benefits to the region than trade, because:</p> <ul style="list-style-type: none"> • Even with the road tarred, given the nature of the terrain (and exclusive of potential increase in border post waiting times due to higher traffic, the journey between Mokhotlong and Underberg would unlikely take much less than 3 hours, which is the time for a journey from Mokhotlong to Butha Buthe (a large town with all services). • Questions why a sudden huge influx of Lesotho traders would head to Underberg and what goods would be traded between South Africa and Mokhotlong. Currently only various small traders operate in the area along with wool and mohair which is sheared in the highland and transported to South Africa. • There is no persuasive argument that supports trade increase. • Tourism in Eastern Lesotho, on the other hand, is showing tremendous growth from a very low base (Refer to Matsoaing venture above) • The success of the abovementioned traditional community tourism projects are dependent on 'Sense of Place', and tarring the road would therefore 'kill the golden goose'. | Noted. Refer to Chapters 2.2, 6.5.2, 6.5.5, 6.2 and 7.4.2. |
| 129. | | | Advised that the stream drifts or causeways, which are designed to allow water normally flowing over the road are seldom closed on account of flooding and if they do flood water level subside rapidly due to steep terrain and small stream catchments. | Noted. Refer to Chapter 2.3 and 3. |
| 130. | | | Advises that a short extension of the concrete approaches to the drifts and causeways would solve the occasional problem of erosion at these drifts/causeways. | Noted. Refer to Chapter 2.3 and 3. |
| 131. | | | Concerned that at one spot near the SA border post, the road becomes very narrow as it negotiates a sharp corner. In order to widen the road here, either a whole hillside would have to be removed and stabilized with unsightly artificial rock up to 100m in height, or a massive outside section would have to be built up. Since vegetation does not grow there, as seeds cannot germinate and develop root systems on artificial rock, | Noted. Refer to Chapter 2.3, 3, 6.11 and Layout Figures 1-8. |

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| | | | the entire hillside along with its unique flora will be removed in the road building exercise. Suggests to keep such a corner as feature, with stop signs and one-way access rather like a one lane bridge. | |
| 132. | | | Foresees a large number of serious accidents caused by inexperienced drivers in dangerous terrain at speeds too fast for safety in such a place. Explains that despite its extreme nature, the Pass in its current form has been the scene of very few accidents, with only two fatal accidents in 16 years. | Noted. Refer to Chapters 6.5.7 and 6.9.1 and 6.10. |
| 133. | | | Argues that a potholed tar surface is far worse and more dangerous to drive on than a potholed dirt road and that due to the extreme conditions, particularly at the switchbacks, even a tar road would require regular maintenance. | Noted. Refer to Chapter 6.5.7, 6,9 and 6,10. |
| 134. | | | Concerned that the current poor or lack of maintenance and crises management evident at the Sani Pass for many years would continue and would cause a tar road to rapidly deteriorate and become impassable by 4x4 vehicles, let alone by sedan vehicles. The proposed upgrade would thereby lead to a worse situation than at present. | Noted. Refer to Chapter 6.9.2. |
| 135. | | | Concerned that during snow and ice conditions on a tarred road, smooth sheets of ice could form, which would be more treacherous than a rough dirt road with stone protruding which would provide more traction. | Noted. Refer to Chapter 6.5.7 and 6,10. |
| 136. | | | Concerned that smooth surfaces might require the use of salt, which Ezemvelo KZN Wildlife opposes due to its effects on the environment. | Noted. |
| 137. | | | Contends that just as Ezemvelo KZN Wildlife feel the border post is not compatible with the World Heritage Site, so a tarred road is not compatible on Sani Pass for the same reason. Furthermore a tarred road would detract from the "extreme natural beauty" which is cited as a reason for the awarding of the WHS status and would be adversely affected by the tarring of the road. | Noted. Refer to Chapter 6.5.1. |
| 138. | | | Recognise that the current road does cause a lot of runoff and erosion, but do not believe that the surface of the road is the cause. The cause is the drainage system of the road, or lack thereof, as the road was never properly designed. The road also has a history of poor road maintenance leading to broken | Noted. Refer to Chapter 2.3 and 3. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | and blocked drainage pipes. Suggests that the problem can be solved through installing better drainage systems rather than resurfacing the road. | |
| 139. | | | <p>Describes their vision of “an upgraded dirt road, a road which remains open for most of the year, allows the feeling of Wilderness, retains the sense of place which makes the Sani Pass so special, allows for access by two wheel drive sedan vehicles. It should remain the current width and follow the existing alignment as far as possible. It should retain the special features which make it unique. It should incorporate as much “over the road” style drainage in the steeper sections as possible rather than pipes under the road which become blocked easily.”</p> <p>Believe this road could be constructed more quickly than a tar surface, with far less damage to the environment during construction and can be built to minimize the impact to the vegetation on the road verges. Indicates that suitable road building material is available in adequate supply in nearby in Lesotho, negating the possible need to create borrow pits in the WHS.</p> <p>Believe such a road could be constructed at a fraction of the cost current cost considered and notes that maintenance of the road at an acceptable level is key. Suggests that maintenance teams are set up using low tech, labour intensive road maintenance methods. Teams of 5 to 10 individuals could thus have a permanent job filling potholes, clearing drainage channels and drains, removing rocks and boulders coming down the mountain. They could also serve as monitors, providing an early warning system for more major issues such as broken concrete pipes. Such maintenance options would also remove the onus from the EKZNW, could provide permanent employment and ensure the best possible road surface. Truly a win-win situation!!</p> | Noted. Refer to Chapter 3. |
| 140. | | | Concerned that a solution is being imposed without any real study having been undertaken to establish need and desirability. Insists that a full social study be undertaken as | Noted. Refer to Chapter 2.2, 6.5, 6.6, 7.4.2 and 7.4.3. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | <p>part of the EIA and that the study look at trade and tourism and consider the value of monetary and non-monetary aspects such as traditional cultures and quality of life. The study should attempt to predict and quantify the likely effects on trade, tourism and peoples' way of life under both scenarios' of untarred vs. tarred. Only at this point could some sort of decision be considered that would benefit everyone.</p> <p>The social study should also include a need and desirability assessment. It should also include a cost / benefit analysis as they believe that the money allocated to fund this project could be better spent in a manner which is more beneficial to a greater number of people than tarring the Sani Pass.</p> <p>Are of the opinion that there is neither a need to tar the road nor is it desirable for the broader community.</p> | |
| 141. | | | <p>Notes that the Phase 1 EIA included the motivation that the upgrade road would reduce the travel distance from Maseru to Durban and questions whether such traffic / road needs exist? Also notes that such a route would transverse eight (8) 3000m+ passes which is much slower and more costly on fuel than the route via the Free State. As such, it is unlikely commercial traffic would use the route at all. The motivation is therefore inadequate.</p> <p>Points out that while the EIA documentation released motivates that the project will provide the people of Mokhotlong District in Lesotho with improved access to medical facilities in Underberg, Mokhotlong has a full-scale hospital and the motivation is therefore null and void.</p> | Noted. Refer to Chapter 2.2 and 6.2. |
| 142. | Ms. Carolyn Schwegman, EIA Co-ordinator, WESSA, KwaZulu-Natal Region | IAP018 (20/06/2008) | <p>WESSA recognises the need to prevent the further deterioration of the Sani Pass by upgrading the road to include:</p> <ul style="list-style-type: none"> • Storm water control • Slope stabilisation • Rehabilitation of the road servitude • Replacement of bridges where necessary • Road widening and re-alignment in sections where it is | Noted. Refer to Chapter 2.3 |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | found to be essential for the safe use of the Pass. | |
| 143. | | | The Motivation needs to be fully substantiated and the use of the Pass beyond its current use fully evaluated in terms of costs and benefits to existing and potential users. | Noted. Refer to Chapter 2.2, 4.6.2 and 6.6 |
| 144. | | | <p>Recommends the <u>need</u> assessment to evaluate and compare the following:</p> <ul style="list-style-type: none"> • The current number of road users and their reasons for use of the Pass • The number and types of users predicted should the road be improved but remain a single lane except where safety requires a section of wider road • The number and types of users predicted should a two way road be constructed. • The options on different road surfaces for each of the above. <p>Furthermore, the <u>desirability</u> of the proposal and Design Specification (width, surface etc) of the upgrade are believed to be closely linked and should therefore be considered together with the 'Need' taking into account the extreme sensitivity of the area – biodiversity value – and the sense of place/wilderness experience it provides.</p> | Noted. Refer to Chapter 7.4.2 and 7.4.3 |
| 145. | | | Concerned that the BID was not clear on how the design and construction criteria for the proposed road, i.e. that it should be a two-way road with one lane in each direction which would allow speeds of between 30 and 50 km per hour, were determined. Considering that the Need and Desirability Studies are still to be undertaken as part of the EIA phase, WESSA questions the rationale for the design and construction specifications. Given the likely impacts which will be caused, WESSA stresses that the rationale for the Design and Construction specifications should be sound. | Noted. Refer to Chapter 2.3 |
| 146. | | | <p>Design Criteria should consider biodiversity through:</p> <ul style="list-style-type: none"> • Prioritising species deserving of highest Red List status • Prioritising conservation significant plants which are too large to be relocated, such as protected trees • Consider impacts on other protected or Red Listed species if the road was to be widened. | Noted. Refer to Chapter 4.3 and 6.4 |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 147. | | | <p>Concerned that a number of factors, which are essential for successful rehabilitation would, often fall by the wayside once a Record of Decision has been issued. Explains that the success of rehabilitation depends to a large extent on the quality of this work and therefore the following factors must be considered:</p> <ul style="list-style-type: none"> • Rehabilitation must be budgeted for at an early stage. • Excavation and replanting must be carried out with care, under the supervision of specialist botanist or horticulturalist, who is experienced in recognising the red data and conservation significant species in the field and who is familiar with their particular habitat requirements. • Scheduling Construction for the removal and relocation of plants should occur during the appropriate season for the species and this has implications for the scheduling of construction. | Noted. Rehabilitation of flora will be addressed in the EIAR and the EMP. |
| 148. | Ms Gracia Z Tshezi, Hlanganani Community Road Safety Council | IAP019 (20/06/2008) | Comments that tarring the road would make it more accessible to move people, but concerned that it would lose its appeal for most of those mentioned above. (organisations she represents). | Noted. Refer to Chapter 6.5.2 |
| 149. | Interfaith Member under the Community Road Safety Council | | Concerned that the proposed project would mean greatly diminished support for the people of two villages, except for a brief (possible) period of work on the Pass while tarring is undertaken. | Noted. |
| 150. | (Pietermaritzburg), Registered Contractor under Vukuzakhe | | Concerned that travel on a tarred surface would be much more dangerous than on an uneven surfaces of gravel surface during ice and snow, which occur in places on sections of the Sani Pass between May to end of September. | Noted. Refer to Chapter 6.5.7 and 6.10 |
| 151. | Association at Hlanganani | | Concerned that through tarring the road the tourism opportunity, whereby tourists have easy access to and experience the magnificent and diverse flora (one of the prime reasons for the Drakensberg being declared a World Heritage Site) at close range within a single day trip, would be lost. Explains that in one day trip enthusiasts can be exposed to more species than he is likely to discover in days of climbing and hiking time, time usually not available to foreign visitors. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 152. | Mr. Mark Liptrot, Chair: Richmond Marianhill | IAP020 (20/06/2008) | Concluded that it would be an ecological disaster to upgrade this portion of the World Heritage Site of the uKhahlamba | Noted. Refer to Chapter 6.4 |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 153. | Conservancy, (All members have visited the Sani Pass) | | Drakensberg Park. | |
| | | | Feel that the disadvantages of this project with its potential impact on the environment far out way the advantages and could have a permanent deleterious effect on the flora and fauna in the area (and 'awe of the Sani Pass's natural beauty') | Noted. Refer to Chapter 6.4 and 6.5 |
| 154. | | | Questions the safety of the tarred road during frosty winter conditions, when a decent graded surface can offer better grip to most vehicles. | Noted. Refer to Chapter 6.5.7 and 6.10 |
| 155. | Ms. D. Schulze, Tour Operator, Major Adventures | IAP032 (18/06/2008) | Opposes the tarring of the Sani Pass (for reasons listed below). | Noted. Refer to Chapter 6.9.1 |
| 156. | | | Concerned over the destruction of the fauna and flora and World Heritage Site. | Noted. Refer to Chapter 6.4 |
| 157. | | | Concerned over the interference with the 'power of nature' | Noted. |
| 158. | | | Concerned that the upgrade will result in increased vehicle speeds, which will lead to more road accidents, particularly under rain, snow and ice conditions. | Noted. Refer to Chapter 6.5.7 and 6.10 |
| 159. | | | Concerned that the quality of a tar road will not be sustainable under the extreme weather conditions. | Noted. Refer to Chapter 3.8 |
| 160. | | | Concerned about pollution of the area and water | Noted. Refer to Chapter 6.3 |
| 161. | | | Concerned over loss of jobs. | Noted. Refer to Chapter 6.6.2 |
| 162. | | | Concerned over closure of companies without compensation. | Noted. Refer to Chapter 6.6.2 |
| 163. | | | Concerned that the proposed project could impact on the Sani Pass as 'a highlight to most international and local tourists'. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 164. | Ms. Sharon Schoutens, Soil and Dust Solutions (Pty) Ltd | IAP033 (25/06/2008) | Agrees with points which WESSA-Sani has made against the tarring of the road as per July 2008 Go! Magazine (Page 21). | Noted. |
| 165. | | | Advises that there is a viable, environmental friendly and sustainable alternative option to tarring the Sani Pass, in as much as a soil stabilizer (Soiltac) can be used to create a sub base and or a surface seal. The road will never need to be regraded again, the surface is water resistant and potholes will not form. The surface will not be slippery. There will be a decrease in maintenance requirements. Benefits would include: <ul style="list-style-type: none"> • Maintaining the sense of place • Protecting tourism from decreasing • Increasing safety – By effective dust control and | Noted. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | associated dust impacts. • 40-50% cheaper than tar | |
| 166. | | | Concerned that “to tar such a road located in a cradle of wondrous nature will have a serious (negative) impact on the area.” | Noted. Refer to Chapter 6 |
| 167. | Ms. Delia Gardner, Landowner in Cobham Valley (for 12 years), | IAP034 (25/06/2008) | Disgusted with the destruction of the environment caused by the Phase 1 of the so called ‘Upgrade’ of the Sani Pass and therefore fear the worst when contemplating what will happen in the Sani Pass itself during Phase 2. | Noted. Refer to Chapter 6.4 |
| 168. | frequent visitor to the Sani Pass with International visitors | | Concerned over ‘operator’s’ (contractor’s) lack of care and understanding on environmental preservation, as evident by the swathe of destruction which is ‘out of all proportion to the proposed width of the road’ at the Phase 1 construction site. | Noted. Refer to Chapter 6.9 |
| 169. | | | Concerned over defacement of further areas caused by collection of materials from quarries. | Noted. Refer to Chapter 2.3.4 and Chapter 6.7 |
| 170. | | | Concerned that the “irreplaceable, internationally admired, natural wondrous beauty, the legacy of our beautiful land for all our people will be dynamited to smithereens” and “that the mayhem will never be repaired”. Noted that “even initial investigations up the Pass have marred and scarred the beauty of the scenery” with evidence of “hacked up protected indigenous trees and disturbed vegetation and beauty spots” | Noted. Refer to Chapter 6.4, 6.5 and 6.7 |
| 171. | | | Questions how the width of the road will be doubled without it destroying the “experienced by each and every tourist who slowly ascends the Pass” | Noted. Refer to Chapter 2.3 |
| 172. | | | Concerned that due to the terrain and weather conditions the construction of the road would be unsuccessful | Noted. Refer to Chapter 6.9 and 6.11 |
| 173. | | | Cautions that once “We” have destroyed the natural wonder of the Pass “no one will be able to reconstruct the mountainside, rock formations and waterfalls”. “We can blast away and destroy but no one can rebuild or reconstruct a natural wonder.” | Noted. |
| 174. | | | Cautions that “Blasting and Machines are not the answer in the Sani Pass” and promotes therefore that the present road should be carefully restored and upgraded by hand using natural materials such as rock. No blasting or further degradation of the environment should be permitted. (“Passes constructed in arid areas by hand with natural rock are still in | Noted. Refer to Chapter 2.3 and 3 |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | full use such as the Swartberg Pass built in 1800s". "Work with our mountains not against them.") | |
| 175. | | | Promotes the upgrade by hand also for the sake of job creation and reviving and teaching of old skills (| Noted. Refer to Chapter 6.3 |
| 176. | | | Pleads for protection and promotion of 'our' heritage and the 'Sense of Place' of the Sani Pass: - by referring to the Salisbury Cathedral, UK, - "Our Sani Pass is our own God given cathedral and yet engineers are prepared to blow it to bits. Have we only gone backwards in 750 years? Where is our sense of respect and humility? Why don't we create our own environmental miracle and make the world amazed?" | Noted. Refer to Chapter 4.9, 4.7, 6.5.1 and 6.8 |
| 177. | Nick and Ester, nick@angelchem.co.za | IAP035 (26/06/2008) | Do not support the tarring concept and cautions that "If the Sani Pass is to be tarred it will no doubt loose its adventurous appeal and challenge and will no doubt impact negatively on tourism and infrastructure." | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 178. | Mr Bees van Blerk | IAP036 (17/08/2008) | Advises that the drainage and the surface of the current Pass must be improved. | Noted. Refer to Chapter 2.2 and 2.3 |
| 179. | | | Advises that the route, gravel surface as well as gradient and width of the Sani Pass should however be maintained as far as possible. | Noted. |
| 180. | Mr. Hugh Paine, Tourist to the area | IAP037 (21/08/2008) | Finds it understandable that some work needs to be done on the Pass to prevent damage. | Noted. |
| 181. | | | Feels that tarring the Pass would invite high volumes of traffic which will continue to grow out of all proportion and cause damage done by heavy vehicles (e.g. Oliviershoek Pass) that is likely to destroy the whole character of the area. (Sense of Place). Advises that "If the surface remains rough with secure sides and drainage, the volumes would regulate itself". | Noted. Refer to Chapter 6.5.1 |
| 182. | Mr. Michael Pickstone-TaylorTaylor, based in | IAP038 (23/08/2008) | Believes that the Pass should not be tarred, just upgraded to avoid erosion and maintain the engineering integrity of the road | Noted. Refer to Chapter 6.9.1 |
| 183. | Franschhoek | | The sense of place will change. | Noted. Refer to Chapter 4.6 and 6.5.1 |
| 184. | | | Fears that the environment would be negatively impacted and degraded if the road is tarred, as it might attract visitors of "the unpleasant, arrogant types with limited skill and respect for nature". Uses the Maun, Nata road leading to the Okavango Delta as an example of attracting the "wrong" type of visitors after it had been tarred and easy access was provided for any | Noted. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | kind of motor vehicle and notes that even increase in admission fees did not deter 'eco-unfriendly' visitors. | |
| 185. | | | Believes there are other ways to attract tourists – investment in an "eco-friendly" way. | Noted. |
| 186. | | | Believes that tarring the Pass puts at risk and may result in loss of "exactly that which so attracts the tourists to that area"; i.e. "least accessible/toughest road", "real Africa" with pristine nature. | Noted. Refer to Chapter 6.5.1 and 6.5.2 |
| 187. | Ms. Sue Fortina | IAP039 (23/08/2008) | Pleads for the Sani Pass to not be tarred. | Noted. |
| 188. | Mr Gerald McCay, Mr Sue McCay | IAP40 (24/08/2008) | Horrified to read about the proposed plan to tar the Sani Pass Road, as the 'black ice' on tarred roads causes chaos and "On Sani Pass this could only lead to certain death." | Noted. Refer to chapter 6.5.7 and 6.10 |
| 189. | Mr. D. Rossouw, Mountain biker | IAP041 (25/08/2008) | Pleads for the Sani Pass to not be tarred as "the character and nostalgia would be lost"; "it would not have been as much fun" (referring to a mountain bike trip); and it would become "just another road". | Noted. Chapter 6.5.1 and 6.5.2 |
| 190. | Ms. Lilian Lebitso, person from Lesotho working in South Africa. | IAP042 (06/10/2008) | Complains and raises a concern about the general poor state of roads that link Lesotho and South Africa and other roads in the area; e.g. Sani Rd, Botha Bothe - Mokhotlong, Moteng Pass, Thaba Tseka – Leribe; and that "the matter is not taken very seriously by the departments of transport and foreign affairs of the two countries. Suggest that the two countries should 'come together' to address this matter. Pleads for the road to be upgraded, even if it is not tarred, to improve road safety and travelling comfort. Explains that: <ul style="list-style-type: none"> • There are thousands of people that are working in SA from Lesotho who rely on these roads • The poor state of the roads between the two countries are very dangerous and life threatening • People's lives are more important than the vegetation impacts. | Noted. Chapter 2.2, 4.6.1, 6.6.1 and 6.9.1 |
| 191. | | | Advises that road upgrade/maintenance would create employment opportunities as jobs would be created to e.g. fill dongas, plant trees and prevent soil erosion. | Noted. Refer to Chapter 6.5.4 |
| 192. | | | Agrees that the road is too narrow for two vehicles to Pass and that bends are 'so bad I hope and pray that one day this matter will be resolved.' | Noted. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 193. | Stepmore Location Community, as was forwarded to Arcus GIBB by Councillor Ndlovu, KwaSani Municipality. | IAP043 (17/06/2008) | Foresees that the proposed project would benefit the aspiration among the Stepmore community to further develop and grow their good relationship, in terms of trade, transport and communication with Lesotho Communities. (Notes that already KwaZulu-Natal donated money and two radios to Sihlaba Thebe Reserve in Lesotho.) | Noted. Refer to Chapter 6.5.4 and 6.5.5 |
| 194. | | | Supports the proposed project, as the Stepmore community believe the project would lead to "growing the town" (Underberg) as the community understands that Lesotho citizens contribute to commercial trade, due to the close proximity of Underberg to Lesotho. | Noted. Refer to Chapter 6.5.4 |
| 195. | | | Foresees that the proposed project would promote tourism and create Jobs. | Noted. Refer to Chapter 6.5 |
| 196. | | | Foresees that the proposed project would reduce road accidents. | Noted. Refer to Chapter 6.5.7 and 6.10 |
| 197. | | | Foresees that the widening of the road would reduce traffic congestion. | Noted. |
| 198. | | | Foresees that the road will make it easier to travel between Lesotho and KwaZulu-Natal. Explains that most people (in the Stepmore community) have relatives in Lesotho. | Noted. Refer to Chapter 6.5.4 and 6.5.5 |
| 199. | | | Supports and appreciates the proposed project. | Noted. |
| 200. | Mqatsheni Location, Community, as was forwarded to Arcus GIBB by Councillor Ndlovu, KwaSani Municipality. | IAP043 (23/06/2008) | Foresees that the proposed project would benefit the community as it will create employment and reduce poverty. | Noted. Refer to Chapter 6.5.4 and 6.5.5 |
| 201. | | | Welcomes the proposed project as it foresees that the proposed project would benefit the local communities as they "can build better relationships and trade (including livestock trade) with each other and welcome each other as black people." | Noted. Refer to Chapter 6.5.4 and 6.5.5 |
| 202. | | | Foresees that the Local Municipality will benefit and business will grow, as the proposed development will provide for attraction of more buyers. | Noted. Refer to Chapter 6.5.4 and 6.5.5 |
| 203. | Mrs. Peggy Frayne | IAP044 (04/09/2008) | Details her recent trip up the Sani Pass in May 2008 noting the very bad condition of the road and heavy traffic. Points out that the poor condition kept the traffic travelling at a slow and careful pace. | Noted. Refer to Chapter 6.5.7 |

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| 204. | | | Comments that an upgrade in the form of proper drainage would regular maintenance would probably stop the bad washing but would lessen the 'experience' making it just another Pass. Describes enjoying the "feeling" and the experience of reaching the top. | Refer to Chapter 2.2, 3 and 6.5.1 |
| 205. | | | <p>Raises the concerns that should the road be tarred, people would lose their jobs i.e. tour vehicle drivers and admin staff of tour companies, and B&B and hotels would lose guests.</p> <p>Comments that upgrading the road could lead to the same over development as has occurred in the Champagne Valley</p> | Refer to Chapter 6.6.2 |
| 206. | Mr Rob Marussi | IAP045 (07/09/2008) | <p>Explains that he has travelled the Sani Pass in all weather conditions and believes the Pass should be left as it is for others to experience.</p> <p>Suggests that if upgrading needs to take place, then all work should stop where preparation work was done in December 2007 or at the Border Post to allow the Police access to the Post. The section beyond (No-man's land) should remain as it has been for all these years leaving a beautiful landscape untouched and as wild as possible.</p> | Noted. |

ISSUES AND CONCERNS REPORT (ICR) – THE PROPOSED UPGRADING OF SANI PASS ROAD (P318): PHASE 2

SECTION 2: ISSUES AND COMMENTS RECEIVED POST-DRAFT SCOPING REPORT: May 2009

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 207. | Philip & Christeen Grant Southern Secrets Hiking and Backpacking | IAP046 (12/01/2009) | Expressed concern and personal disappointment as he considers the DSR to be heavily biased in favour of Alternative 5 and that the EIA is not impartial. | Noted. However, the EIA has to describe and assess the proponent's proposed project which is Alternative 5. As such, most of the detail and description is related to this option. |
| | | | In addition, he expressed concern that people who are unfamiliar with the area or have a limited understanding of the issues surrounding the proposed upgrade maybe mislead and opt for Alternative 5 | Arcus GIBB also attempted to provide a clear description and overview of all the alternatives in order for all the IAPs to obtain a reasonable understanding of the alternatives (Section 3). (Refer DSR pg 28-30). |
| 208. | | | Foresees that the SA Roads Department officials will ultimately 'rubber stamp' this project and are probably also biased towards Alternative 5. | The Department of Transport is the proponent for the project and have already approved the project for Alternative 5. The Department of Environmental Affairs and Tourism (DEAT) is the competent authority responsible for authorising the project. The DEAT are obligated to consider the project and its potential impacts and make an informed decision in the best interests of the environment. Arcus GIBB will endeavour to ensure that the DEAT is provided with all the information necessary to make that decision regardless of the alternative. |
| 209. | | | <p>Raises concern that there have been important conclusions based on erroneous assumptions in the DSR, for example:</p> <ul style="list-style-type: none"> • The DSR refers to 'frequent closures of Sani Pass due to soil erosion'. However to the best of their knowledge, with very few exceptions, within the last 10 years approximately, Sani Pass has only been closed due to adverse weather conditions and not due to soil erosion. • If Alternative 5 is approved, the P318 over Sani Pass and Black Mountain Pass in Lesotho (Kotisophola) will never | <p>Noted. The assumption has been amended to reflect the possible intermittent closure of the Pass due to significant erosion and environmental damage and no long refers to specific events in history.</p> <ul style="list-style-type: none"> • The 'soil erosion' referred to relates to soil erosion which was caused by adverse weather conditions ultimately causing the Pass to be closed. |

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| | | | <p>be an 'all weather road' as heavy snow and/or ice will force its closure at least 2 or 3 times during winter.</p> <ul style="list-style-type: none"> The route from Maseru to Durban via Sani Pass (P318) is not a viable alternative to driving around Lesotho on the existing SA road as, upgrading Sani Pass road will not shorten the distance in any way and secondly, anyone who has travelled through Lesotho is aware that it is impossible to achieve an average speed of more than 30 - 40kms p/h even on hard surface roads due the extremely tight corners, and the presence of herders and domestic animals on the road. The P318 may be shorter in distance, but will never be shorter in time. | <ul style="list-style-type: none"> 'All weather road' implies the road is useable under most weather conditions except extreme conditions such as heavy snow and/or ice. Refer to DSR Pg13, which establishes the commitment by the Lesotho government to upgrade their portion of the road to Mokhotlong with a goal to build a hard-surfaced road to Maseru. As such, with an upgraded road between the two centres, the route does become an alternative route for travellers should they wish to use it. |
| 210. | | | Requested further detail on the envisioned development of tourism in East Lesotho as a result of the proposed upgrade. It is questioned whether tourism will benefit the wider village communities in Lesotho or a few already wealthy business people and in the process visually and environmentally destroy the Sani Top area. | Noted. During the scoping process it was found that further information in this regard is required. As such, this issue is being addressed by the tourism component of the Social Impact Assessment (SIA). |
| 211. | | | Expressed concern that DSR states that the proposed upgrade the Sani Pass road will improve access to and benefit the Qachas Nek and Sehlabathebe areas in addition to the Mokhotlong District, however the P318 leads nowhere near these areas. This displays a basic ignorance of Lesotho geography. | <p>As noted above further socio-economic data is required. Preliminary studies have shown that there is potential for socio-economic development to reach far afield, as a result of the upgrading of the Sani Pass.</p> <p>Discussion with the Lesotho Authorities have indicated that upgrading the access route / link into Eastern Lesotho could spark further road upgrades and development along the entire eastern region.</p> |
| 212. | | | Expresses concern that the use of shotcrete, soil nails and the concrete foundations will visually destroy the Sani Pass valley | Noted. The engineers take cognisance of the importance of aesthetics in this area and as such will endeavour to reduce the visual impact where possible. Mitigation measures will be informed by the Visual Impact Assessment (VIA) and Geotechnical Study. |
| 213. | | | Stated that herders with domestic animals and recreational pedestrians still need to use the upgraded road and have not been considered. | Pg. 66 of the DSR considers pedestrians under Impacts on Road Safety and Travelling Conditions. This aspect will be further investigated and assessed in the Impact Assessment Phase. Herders should not be allowed to use the Pass currently or in the future should the Pass be upgraded. |
| 214. | | | Stated that the DSR stopped it's review at the Lesotho | As noted in 209 above, the Lesotho government has |

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| | | | Border, however is it imperative to consider the rest of the road from Lesotho to Mokhotlong, which also requires upgrading and has similar whether conditions to the (P318). It would be pointless to drive to Lesotho and be stopped by an inferior upgraded road in Lesotho. | committed to upgrading their portion of the road to Mokhotlong with a goal to build a hard-surfaced road to Maseru. As such, with an upgraded road between the two centres, the route does become an alternative route for travellers should they wish to use it. |
| 215. | | | Suggested that the upgrade of Sani Pass (P318) should involve minimum construction to enable the road to be negotiable by non-4x4 vehicles, in all but extreme weather conditions. This would then meet all the detailed requirements for the road with the least visual impact. A permanent maintenance team could then be employed, creating employment in the area. | Noted. The proposed upgrade is similar to Alternative 3 however, has significant con's which need to be considered in addition to the pro's mentioned. The requirements of the road would also not be met by this option. Alternative 3 will be assessed in the Impact Assessment Phase. |
| 216. | | | Grants favour Alternative 3 as they believe it will not restrict non 4x4 vehicles, as previous experience in 2000 showed that minor upgrading and re-surfacing enabled the road to be negotiated by non 4x4 vehicles and saloon cars (even towing caravans!) for about 2 years. Unfortunately the road surface deteriorated due to lack of ongoing maintenance and inadequate drainage. | Noted, however there are still significant issue with this option such as lack of material, continued soil erosion. The Lesotho Government has also indicated they will not grant permission to obtain materials from Lesotho. All options and aspects will be investigated in the Impact Assessment Phase. |
| | | | Suggests that gravel can be sourced in Lesotho, as the basalt gravel is non-slippery and drains well, as is evidenced by the many perfectly adequate gravel roads in the Lesotho Highlands. | Noted. Meetings have been held with the relevant Lesotho Authorities, including the with the Ministry of Tourism, Environment and Culture who informed the Engineer that Lesotho will not permit mining of material from Lesotho. In addition, the area also forms part of the Sehlabathebe National Park and of the greater uKhahlamba World Heritage Park. |
| 217. | Mr. Mike Clark | IAP047 (19/01/2009) | Expressed concern that hard surfacing upper reaches of the Sani Pass will destroy its character completely. | Noted. This issue will be assessed in the Impact Phase of the EIA. |
| 218. | | | German Tour operators indicated they would not return if the Pass were hard surfaced with whatever medium. This is because Europe has more spectacular tar passes, so Germans come to Africa to see what the old roads were like and for the adventure. The Sani Pass is something unique, it is therefore not necessary to destroy one of the countries major tourist assets. | Noted. Refer above and note that the Pass is being 'destroyed' already. Upgrading is not intended to destroy the area's tourism assets but to protect them and the surrounding environment which is currently under severe stress. |
| 219. | | | Stated that the upgrade of the Pass will only benefit a handful of people, whereas improving access to the Southern Drakensberg by upgrading the Loteni road will benefit thousands tourists and residents. | Noted. Refer to DSR section 2.2 which details the motivation for the proposed upgrade. Included is the motivation that the Sani Pass environment is in a severe state of degradation. As such, upgrading or improving other roads will not address the |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| | | | | environmental issues of the Pass. |
| 220. | | | Requested that the road be surfaced up to the present Border Post, and that the top section be left alone. | Noted. Arcus Gibb has included this factor in Alternative 4. Therefore this option will be assessed in the assessment phase of the EIA process. PP has identified that all parties are in agreement that the lower section to the Border Post can be hard-surfaced should the project go ahead. |
| 221. | | | Expressed concern that a hard surfaced road will pose a serious hazard in winter due to ice. Currently for two months of the year ice is a problem, however, the rough surface enables vehicles to pass. In England there are steeper roads, which are closed for three months a year, which is unacceptable. | Noted. The engineers are cognisant of the safety hazards due to weather conditions and topography and are making every effort to incorporate contingencies into all designs. The proposed upgrade will be an all weather road, except for extreme weather conditions. |
| 222. | | | Stated a smooth and wider surface will encourage speeding, which will lead to accidents. The road does not need to be widened much except perhaps on some corners. Exclaimed that motorists are already exceeding the speeds that are proposed for sections of the Sani Pass after it is 'improved. | Noted. As above, engineers are aware of possible speeding issues and related safety issues. With reference to the width, the upgraded Pass surface will be slightly wider, but not significantly. |
| 223. | | | Stated a hard surface is more likely to be damaged by weather, and a bad hard surface is infinitely worse than a gravel surface that has been eroded. | Noted. |
| 224. | | | Stated that the high and unsightly cuts into the mountainside, in excess of 30 meters will be visible from far beyond the berg is cause for concern. The cuts would make the already unstable ground more so resulting in rock falls and subsidences. He then suggested using a narrower pathway and building the road up over the slope rather than cutting into the mountain as a solution. | Noted. Refer to section 4.8 of the DSR which identifies the aesthetic issues associated with the proposed upgrade. A geotechnical study has been done which considers cuts and banks. The VIA will consider the possible visual impacts. |
| 225. | | | Expressed concern that maintenance would be a problem if it is contracted out. The most efficient form of maintenance hand labour has never seriously been considered as proved by the Basotho over a period of at least forty years. | Comments noted. DOT has indicated that it has its own maintenance teams and does not contract out such services. |
| 226. | | | Drains will unlikely be kept in order etc. in poor weather and working conditions. Suggested that drains be placed diagonally across the road surface, not in easily blocked pipes. Noted that this system was efficient for many years. | Noted. |

| No. | Name, Position, Role and/or Organisation | Source Reference Number & (Source Date) | Comment | Response & References to Specific Relevant DSR Section(s) |
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| 227. | | | Noted that the engineers appear to have taken no heed of the historical problems and solutions of the Pass. This will be an undertaking for which there are no precedents in the technical sense, practical experience will only be gained on the job so it is important to consider any prior experience before making a disastrous mistake. | <p>The Engineers are well aware of current and historical engineering problems and solutions and are looking at all possible options including new and progressive techniques suitable to Sani Pass.</p> <p>The Engineers have researched the project using various books that have been written on Sani Pass, including that of Mr. M. Clark and have taken cognisance of the experiences and hardships that the early roadbuilders suffered. These experiences were taken into account in the design and we concur with Mr. Clark that the practical experience is going to take place during construction and as such the Engineers propose to have senior engineers on site during the construction period.</p> |
| 228. | Ms. Rosanne Clark: Chairman Pholela Biosphere Reserve | IAP048 (22/01/2009) | Expressed concern that although the road is not officially part of the UDP WHS it should not detract from its environmental concerns. | Noted. Arcus GIBB recognises the importance of Sani Pass road transecting the UDP WHS. In addition, refer to section 1.4.6 which reflects the legislation and policies of which the EIA be guided by. Note the inclusion of policies specifically regarding the UDP WHS. |
| 229. | | | Expressed concern that major earthworks required for construction on the existing route will be an eyesore. | Arcus GIBB is aware that construction will be an eyesore but is necessary to repair the very sections of the Pass Ms. Clark notes as unstable before they collapse and the Pass is closed permanently. |
| 230. | | | Expressed concern that the area, particularly near the top of Sani Pass is very unstable and prone to landslides in the wet season and also when under heavy snow. | Noted. Refer to Chapter 2.3 of the DSR. |
| 231. | | | Expressed concern over loss of the adventure experience due to widening and straightening the road, which people are looking to when visiting the area. | Noted. Refer to Chapter 6.5.1 |
| 232. | | | Notes that upgrading the road will not reduce the potential danger. A better surface will encourage speeding and reckless driving. In addition it will attract people who may not view the road with extreme caution and use it without experience of driving on steep inclines or inclement weather conditions. People may use vehicles not suited for this type of mountain pass. | Noted. Arcus GIBB and the project team are aware of this issue. Please refer to Chapter 6.5.6. Safety, speeding and traffic have been identified and are under assessment. The Pass needs to be designed/upgraded to allow all vehicles access under as many conditions as possible. |
| 233. | | | Advised that the maintenance of the upgraded road will need constant monitoring. There is a perception that hard surfaced | Noted. Refer to section 6.9.2 on road maintenance in the DSR. Project Engineers have indicated that they would include |

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| | | | roads require no maintenance, however maintenance will have to be as regular and more important. | specification for ongoing maintenance in their engineering plans. The project team is well aware that the upgraded road will require ongoing and regular maintenance The DoT has advised that they would be responsible for ongoing maintenance of the Pass road. |
| 234. | | | Advised that ice on a hard topped road will be very dangerous and impassable. Users can travel on a bad gravel road more easily than a hard-top that has been severely damaged by water, ice, frost or snow. | Noted. The engineers are aware of the issues and are trying to design an appropriate road which cannot be significantly damaged by water/ice/frost/snow in the short to medium term. |
| 235. | | | Stated that the proposed road upgrade should be put on hold until a need and desirability and proper investigation is undertaken on the new border post structure, as a bigger border post will also attract more users of the Sani Pass and there are doubts about the relocation of the new border post as the 'preferred' site is in a wetland which is liable to experience severe flooding. | Concerns noted, current indications are that the Border Post will not be relocated although this has not been confirmed. As such, the EIA for Phase 2 cannot include eventualities for the relocation without confirmation. It should also be noted that the Border Post Project is completely independent of the Sani Pass Road Upgrade Project. The Economic Study and SIA are considering need and desirability of the proposed upgrade. |
| 236. | | | Stated that the view that the proposed upgraded road is essential to open up the region is flawed. She suggested that a better option would be to upgrade the road from Loteni to Himeville from the end of the present tar road 30kms south from Nottingham Road. This option will open up a vast rural area to schools, clinics etc. The Sani Pass road will only benefit a few people, if any. | Noted. Discussions with Lesotho IAPs have suggested that the upgraded route could potentially open the region to trade and tourism. Although there is a need to upgrade other roads in the area which also have significant benefits, they are not alternatives to resolving Sani Pass issues and as such, cannot be considered in this project. |
| 237. | | | Expresses concern as some members of the Pholela Biosphere rely on the Sani Pass for their livelihood as guides, accommodation providers and tourist drivers and any restriction on these activities during the construction of the upgrade will impact unfairly on their livelihoods. In addition tourists have already intimated that if the excitement goes out of the present Sani Pass experience because of a wider less adventurous road, they will not return or send groups which would impact on the local economy. | Noted. Social and tourism impacts related to the proposed upgrade have been recorded as significant potential impacts and are thus under investigation through the SIA (which includes tourism) and the Economics Study. The issue of keeping the Pass open during construction has been recognised and is under discussion. |
| 238. | Ms. Sharon Schoutens Soil & Dust Solutions Pty | IAP049 (23/01/2009) | Requested that her comment submitted on 25 June 2008 and which is referenced in the draft Scoping report be reiterated. Advised in response to a number of comments in | Noted. The two reports indicate that the tests carried out suggest that enhanced strength parameters may be achieved using Soiltac as a stabilising agent. These results, however, |

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| | Limited | | <p>the Scoping Report that the incorporation of Soil & Dust Solutions Pty Ltd's soil stabilizer will achieve the following:</p> <ul style="list-style-type: none"> • The retaining of the natural aesthetics of the scenic Sani Pass • A safe road surface with a reduced maintenance requirement • Reduced cost (much less than cement or asphalt) • A reduced environmental footprint, this is especially important in consideration of the location <p>Provided two reports (see Appendix K, IAP comment 049) which set forth results of extensive tests conducted by Africon and Geostrada on a mine haul road and crusher tip which was constructed using Soil & Dust Solutions (Pty) Ltd's soil stabilizer. The road has traffic volumes of 300 tonne trucks every 30 seconds, and was constructed over a year ago. Soil & Dust Solutions (Pty) Ltd's has a number of additional test reports, laboratory reports and site references which prove the performance level of the product and the viability of it being the right solution for the upgrade of the Sani Pass.</p> | <p>only reflect on conditions at the Khumani Mine Sishen, where the S3 gravel referred to has a very high maximum dry density value of 3200 kg/m²: some 45% higher than the normal materials employed in road construction. The tests were apparently carried out at the construction stage of the wearing course, and do not report on the long term life cycle performance. As the reports are based on test data circa September/December 2007 it would be interesting to note the condition of the wearing course at the present time after heavy traffic usage. Notwithstanding the possible merits of Soiltac, and these will be investigated further, there is always a concern in using an innovative proprietary product for the construction of a Provincial Road.</p> |
| 239. | Ms. Carolyn Schwegman Wildlife and Environment Society of South Africa (WESSA) | IAP050 (23/01/2009) | <p>Congratulated the EIA Consultants on the job done so far. Acknowledged that the report has endeavoured to cover all the many issues raised about the project and has acknowledged the many shortcomings and unanswered questions. The 6 alternatives proposed for the road is a good way forward to find the best solution to the problem.</p> | <p>Noted and appreciated.</p> |
| 240. | | | <p>Advised that the current global economic climate needs to be taken into account and an updated cost analysis presented. There is little point in pursuing an alternative that cannot be carried through and it is wise to reconsider at an early stage and downgrade the project to a level which is economically sustainable.</p> | <p>Noted. Economic Study will examine market conditions related to the current and long-term economic climate.</p> |
| 241. | | | <p>Stated that in the opinion of WESSA, the Scoping Report makes incorrect assumptions and a number of erroneous conclusions, some of which are crucial in comparing the various alternatives. WESSA's comments therefore</p> | <p>Noted.</p> |

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| 242. | | | <p>concentrate on pointing out these inaccuracies.</p> <p>Noted that chapter 5 of NEMA is aimed to provide development which is socially, environmentally and economically sustainable, which is crucial. As such, specialist studies in the assessment phase must look at the sustainability of the 6 alternatives put forward, the micro-environment and macro-environment. Thus the studies should not only consider the KwaSani Municipal area, but rather the effects on international linkages. In addition, the quantitative impacts on the Mokhotlong area and the effects of increased trade and/ tourism via the Sani Pass on Butha Buthe, the whole Lowlands of Lesotho and even the Eastern Free State should be considered.</p> | <p>Noted. Refer to section 7.4 of the DSR for complete terms of reference for all specialist studies to be undertaken in the assessment phase and Section 7.4 for specialist Terms of Reference.</p> <p>Arcus GIBB is aware of the potential impact area of the project and has undertaken to ensure the extent of the project does not just consider the Pass and Underberg, but considers impacts on the area between Sani Top and Mokhotlong in Lesotho and between Underberg and Pietermaritzburg.</p> |
| 243. | | | <p>Noted as per the DSR that the NEMA further states that a cautious and risk-averse approach is implied by sustainable development. This approach should suggest that from a tourism perspective, that a concrete and well defined present road with an abundant growth path (a scenario based on the Sani Pass as a “wilderness experience” on a gravel surface) would be preferred over some ill-defined future based on tarring of the road and. “killing the goose which lays the golden egg”.</p> | <p>Point noted, however Arcus GIBB must point out that the proposed project is for a hardened surface and does not imply the road will be tarred. As proposed in the DSR a concrete road (which can be made to look like gravel) is the most favourable option at this stage.</p> <p>The social, tourism and economic assessments will attempt to determine the impact of a hardened surface on the “wilderness experience”.</p> |
| 244. | | | <p>Referred to Section 1.4.5 of the Scoping Report and highlighted that the Sani Pass Road itself is an asset of national heritage significance. It has tremendous history, and the upgrade threatens to totally alter it. It was strongly urged that the heritage specialist report take the road as a whole as its starting point, rather than looking for individual heritage sites along the way.</p> | <p>Noted. Refer to Chapter 6.8</p> <p>The Heritage Study is aware of that the Pass itself is a asset of national heritage significance and will assess the significance thereof in addition to individual heritage sites.</p> |
| 245. | | | <p>Noted that in SECTION 1.4.6 (a) of the DSR on SADC, for the first time since the project was proposed, the real motivation for the proposal was provided. This motivation noted that the Sani Pass upgrade is part of a regional transport/communications plan which is laudable and fully supported by WESSA. However WESSA further notes that these plans were created and approved by someone with no idea of the situation on the ground.</p> | <p>Noted. This however, is only part of the motivation as the project also aims to protect the environment from further degradation. This could solely justify the need to upgrade the Pass.</p> |
| 246. | | | <p>Suggested that the SADC objectives would better be</p> | <p>Maintaining the Sani Pass and the roads in Lesotho as gravel</p> |

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| | | | achieved by keeping the Sani Pass as a gravel surface and keeping all the roads in the Eastern Lesotho highlands as gravel surfaces as this is part of the appeal of eastern Lesotho to tourists – the sense of remoteness. Tarring roads in Lesotho may bring more vehicles to the area, but they will traverse rapidly through the country and Lesotho will not benefit from the “day-trippers”. | roads is not environmentally sustainable in the long term as material will always have to be obtained from a suitable source. Indefinite mining from a borrow pit will have significant environmental impacts at the source and when the material is washed off the roads. |
| 247. | | | Noted that the type of tourist who seeks wilderness and a sense of remoteness is likely to stay longer in the country, and use services provided by local tourism businesses to the benefit of the country as a whole. | Noted. Tourism issues are being assessed through the SIA (which includes tourism). |
| 248. | | | WESSA is of the opinion that SADC and Lesotho should have detailed tourism studies to establish the potential in east Lesotho before ill-conceived and far reaching projects are proposed. | Noted. Arcus GIBB will enquire as to which representatives are responsible for such studies and forward on the suggestion. |
| 249. | | | Suggests that as part of the Impact Assessment process, that the top decision makers from SADC, South African and Lesotho governments visit the Sani area on a fact finding mission and that we are able to make our submission to such a delegation. | Noted. Arcus GIBB will pass the suggestion on to the client and Lesotho Government. |
| 250. | | | Questioned with reference to SECTION 1.4.6 (b), the legitimacy of the statement, where the MDTP concurred that, tarring the Sani Pass will lead to sustainable livelihood and opportunities for people in East Lesotho as noted in the DSR. | The statement referred to considers the upgrading of the Pass in the broader context – not just the ‘tarring’. The assumption that the upgrading will conserve globally significant biodiversity and cultural heritage and contribute to socio-economic growth through sustainable livelihood opportunities will be validated through the EIA process. |
| 251. | | | Highlighted with reference to SECTION 1.4.6 (d) that the World Heritage Site IMP noted that roads that are heavily used should be all weather roads, however, the Sani Pass road has never been heavily used. The need to upgrade to an all weather surface is thus not required under the WHSIMP. | Noted. The Sani Pass road utilization has been assessed in the Traffic Impact Assessment undertaken by VelaVKE to be reviewed as part of the Impact Assessment Phase. |
| 252. | | | Noted that in SECTION 1.4.6 (e) The Integrated Development Plan’s (IDPs) look to provide growth and employment to people, however, tarring the Sani Pass will provide short-term employment during the actual road construction, but it will result in harm to the tourism industry and thus lead to a long term decline. As was the case in the | Noted. This issue is one of those being assessed in the SIA. |

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| 253. | | | St. Lucia debate. Contends that eco-tourism provides the best potential for future economic growth in KwaSani Municipal area and the Mokhotlong District. This clearly means leaving the road between Good Hope and Mokhotlong as a dirt surface. | Noted. No substantiated facts are provided to prove that hard-surfacing the road will not allow tourism and economic growth in the region. The opposite may be true and will be assessed in the SIA and Economic Study. |
| 254. | | | Expressed concern with regard to the Departments of Transports (DOT) motivation in section 2.2.1 in the DSR, which portrays DOT as implementing orders, where a political decision was taken to do the upgrade the Sani Pass prior to any consultation with local communities on either side of the border. | Noted, however, the decision to consider the upgrading of the Pass may have been made without consultation, but the final to undertake the Pass will not commence until the appropriate authorisations have been received (which would include some level of public consultation). |
| 255. | | | Questioned who will be accessing the UDP from Lesotho. And whether there is clear evidence of frustrated travellers trying to access the UDP from Lesotho. | Discussions with Basotho's indicated that large numbers of locals use, and will continue to use the Pass - including those who have not been able to because of the condition of the Pass. |
| 256. | | | Noted that the upgraded Sani Pass road is 150km shorter than existing flatter route via the Free State and the N3, however, WESSA questions, if commercial traffic will use the Sani Pass route with the steep and winding mountain passes. Negotiating this route will thus take longer, using more fuel. | Noted. The SIA and Economic Study will identify potential users and their willingness to either take the route around Lesotho or use the route through Lesotho. The decision to use either route will be at the traveller's discretion but would at least provide an alternative. |
| 257. | | | Suggested that actual tests are undertaken to determine quantitative data of the time and fuel consumption to travel on the existing route as opposed to the proposed P318 route. In addition the potential volume of traffic on the proposed P318 route and of the existing route between Maseru and Durban needs to be surveyed. | Noted. The Economic Study in the Assessment Phase will attempt to assess the relative cost-benefits of alternative transport routes on business, with input from the project engineers. |
| 258. | | | Contended that the proposed development will not open up tourism into eastern Lesotho but would in fact do the opposite. Tarrred roads do exist in Lesotho into the highlands, from Butha Buthe via Oxbow to Mokhotlong and from Hlotse to Katse Dam, however in neither case has meaningful tourism development taken place as a result. Tarring a road does not draw tourists in itself. Rather, it would be more prudent to study what tourism initiatives are succeeding currently and to build on it. Tourism growth in Lesotho is largely based on small scale community tourism initiatives, based on Basotho culture, pony trekking and hiking. These | Pointed noted. It is however necessary to point out that there is no evidence to show that current initiatives will not continue. Tourism in Lesotho may also be restricted to small scale community initiatives due to the limited access to the region. The SIA will consider current and potential tourism opportunities. It should also be noted that eastern Lesotho, which although tarred, does not have tarred access roads thereby limiting admission to the region. Furthermore, should access be improved (by whatever means) there are other potential |

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| | | | are all enhanced by keeping the sense of remoteness which the Lesotho highlands have as their biggest asset. | tourism opportunities in the region, in addition to current small scale initiatives, as has been recognised by the Lesotho government and Tourism KZN. |
| 259. | | | Opposed the DOT motivation that the proposed upgrade will build business links between Mokhotlong and Underberg and Pietermaritzburg is taken as a certainty. Suggests that an in depth study is required to determine the above. | Noted. The economic study will establish whether business links will be built in these areas. |
| 260. | | | <p>Noted that it was suggested that the customs requirements at the border is the biggest obstacle to trade on the Sani Pass and should to be investigated.</p> <p>In addition, increased trade via the Sani Pass may result in a decline in trade in other areas meaning the pie would not be enlarged at all, it will merely alter who will benefit. In addition, an upgraded gravel road will achieve the same ends at a fraction of the cost and disruption.</p> | Noted. Economics specialist will be made aware of the customs requirements in consideration in their study. The study should also determine who will benefit from the road. |
| 261. | | | Questions, that in terms of section 22 of the DSR, whether accessibility will be increased, as WESSA is of the opinion that a gravel surface on the top section of Sani Pass is the best surface, to ensure the road is open for the maximum number of days a year. The road was closed due to a massive thunderstorm in 2001, otherwise only snow and ice have closed the road. An all weather surface will become far more treacherous in such conditions than a gravel surface and will thus lead to decreased accessibility. Noted that even a tarred road would have been affected by the heavy storm in 2001. | <p>Noted. However, as mentioned previously, a gravel road is not sustainable and fatally flawed as their no material to continually replenish lost soil indefinitely. The Engineers are looking into a hard-surfaced all-weather road which will have the benefits of a gravel road but is not easily erodible.</p> <p>It should also be noted that although the intention is to create an all-weather road, which is accessible under as many weather conditions as possible, but not necessarily extreme weather conditions. It is accepted that the Pass will still be closed under extreme weather conditions.</p> |
| 262. | | | Advised that a new scenic tourism route can be opened up without an all weather surface but with a good quality and well maintained gravel surface. This will achieve the same results at a fraction of the cost or disruption. Namibia's extensive network of gravel roads illustrates gravel roads can be the basis of a highly successful tourism product. | Noted. Ignoring the comments already made discussing the potentially fatal flaws in an upgraded gravel road, the Sani Pass has a very unique terrain and climate and as such cannot be compared to Namibia which has a completely different climate and rainfall regime. Further investigations into tourism needs will be undertaken in the Assessment Phase of the EIA. |
| 263. | | | Reviewed Section 2.2.1, Pg 14 of the DSR and agreed that drainage at the top of the Pass is of great concern and as such WESSA supports its improvement. However, disagreed with the DSR which states that there have been frequent | Noted. This statement has been revised. |

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| 264. | | | <p>road closures due to the gravel surface as there is no supporting evidence of this statement. It is factually incorrect and creates totally the wrong impression.</p> <p>Reviewed section 2.2.1, Pg 14 of the DSR and motivated that if a gravel road was constructed with proper drainage, the following would be achieved:</p> <ul style="list-style-type: none"> • Improved drainage will result in greatly reduce the amount of gravel loss off the road surface • Reducing gravel lost with a dedicated full-time maintenance team to ensure that gravel is put back on the road from drains, pipes etc on a regular basis • Easy to find gravel as high quality road building material is available within 10km of Sani Top, in Lesotho. It is basaltic soil, and without being experts, from the experience of local tour guides over many years in eastern Lesotho, are convinced that reason, gravel roads in Lesotho are usually in a good condition and drivable even in very wet conditions and is due to it being built on basaltic soils • In addition, since the purpose of the project is touted on a cross-border initiative, there should be no issue with Lesotho providing road material to the gravel surface of the road. | <p>road closures due to the gravel surface as there is no supporting evidence of this statement. It is factually incorrect and creates totally the wrong impression.</p> <p>Noted. However the option of an upgraded gravel road is flawed in the following respects:</p> <ul style="list-style-type: none"> • No matter how efficient the drainage is, at grades of > 20%, the Pass will still suffer gravel loss and this will still block the pipes and end up in the rivers creating an environmental impact • The Project Engineers and the Lesotho Ministry of Tourism, Environment and Culture have met to discuss the possibility of sourcing gravel from Lesotho to maintain the Pass (indefinitely) which the Lesotho Government has rejected as the surrounding area forms part of the Sehlabathebe National Park and WHP. • Such a gravel road requires regular maintenance and continuous gravel replacement. In addition to there being a lack of suitable material in the area, sourcing gravel indefinitely is environmentally unsustainable and creates an environmental impact at the source no matter how much control is implemented. This is unacceptable and renders this option flawed, if not fatally flawed. • Continuous gravel replacement implies gravel loss which will inevitably end up in the Mkomazana River causing direct and indirect impacts – which is also not acceptable. • In addition to the above comment, obtaining gravel from within 10kms of Lesotho, as has been suggested, is not possible as this area is still part of the uKhahlamba World Heritage Park. All borrow pits MUST be outside of the WHP. |
| 265. | | | <p>Reviewed Section 2.2.1, Pg 14 of the DSR and agrees that that erosion causes siltation in the Mkomazana River, however, questions how much runoff occurs due to the road itself. WESSA suggests that a specialist study should be undertaken to quantify it, by using a comparative study between streams elsewhere in the range where no road</p> | <p>Noted. The Aquatic specialist study in the Assessment Phase will attempt to determine the impacts on the riverine system resulting from use of the Pass using methods they feel appropriate.</p> <p>The Hydraulics Study being undertaken by the Engineers will</p> |

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| | | | exists to compare how much “natural” erosion takes place and how much erosion is due specifically to the road in its current state. | determine quantities of water entering the system and how this is affected by the Pass. |
| 266. | | | Stated that if drainage is improved, even with a dirt surface, the amount of silt reaching the river will be reduced. | Noted. This silt could still have a significant environmental impact and the initial problems remain i.e. soil erosion and impact on the riverine system. |
| 267. | | | Disagrees with the statement in the Scoping Report that the frequent road closures impact negatively on the people in the Mokhotlong area, as the road has not been frequently closed due to the road surface. | Noted. Statement will be revised to reflect that road closure is not due to the condition of the road surface but rather weather conditions. |
| 268. | | | Noted that in Paragraph 3 of section 2.2.1 the issue of dust is highly exaggerated, with no supporting evidence as the travel speeds on the Pass are extremely low. As a result the dust problem is far less than, for example, on the Phase 1 section. | Noted. However, the point under criticism notes the potential impact of dust as has been experienced on gravel roads (generally) and aims to prevent such impacts occurring on the Sani Pass. Some dust is generated by vehicles on the Pass and therefore has the potential to impact on the adjacent verge vegetation. |
| 269. | | | Reviewed Section 2.3 of the DSR (road design) and expressed concern that the road specifications are not flexible and should rather be based on the impact a road built to these specifications will have on the sensitive environment. Should these specifications be fixed at this stage of the assessment process it is clear that the principles of sustainable development have not been taken into account and relates that the project is being promoted largely on political considerations. | The road design must comply with the specifications of The DOT and the relevant SANS requirements. The Engineers are well aware of the sensitivities related to the Pass and its design and making every effort to ensure its design accommodates all parties requirements where possible. This is evident in the numerous discussions with the various key stakeholders in the project. |
| 270. | | | WESSA is of the opinion that the sensitivity of the Sani Pass in terms of its biodiversity should determine the criteria/Terms of Reference for the road. | Discussions with Dr. Elsa Pooley have already informed the design of the road to date and the results of the ecological specialist study will also be considered in the design of the road and the Environmental Management Plan (EMP). |
| 271. | | | Reviewed Section 2.3.2 of the DSR (Vertical Alignment) and stated that the design speed must be compromised where necessary to ensure minimal environmental impact. | Noted. See above. In addition the modifying the design to meet real and practical needs of the road including speed control. |
| 272. | | | Notes that at present, the road has been designed as though Alternative 5 is already approved. WESSA suggests that as part of the process, the road should be designed as though Alternative 3 is approved, which would be the ideal alternative. | Noted. The road design is far from complete and has up to this point tried to take into consideration all environmental considerations. In terms of the Scoping Process, the DOT has to apply for their proposed (preferred) design (Option 5) while considering other possible/suitable options - of which Option 3 |

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| | | | | is one. Option 3 is not the proponent's preferred option and the road has therefore not been designed as such. |
| 273. | | | Reviewed Section 2.3.3 of the DSR on Shotcrete and disagrees that shotcrete is the perfect cure for all ills, as one cannot turn concrete, however tinted or moulded, into nature. Chapmans Peak is an example of the use of shotcrete, with an ugly result. In addition Chapmans Peak is currently closed due the unstable slope, despite the millions spent on the project. Noted other examples of concrete stabilisation measures that looked ugly and expressed concern that the Sani Pass will look like a great dam wall when complete. | Noted. The services of a Geotechnical Engineer who specialises in mountain passes has been commissioned to undertake the geotechnical study and assist with bank and slope design. Stabilisation of the Sani Pass "switchbacks" is definitely required and the most appropriate method will be applied to achieve this. The Visual Impact Assessment (VIA) will provide recommendations to minimise aesthetic impacts. |
| 274. | | | Noted that the arrestor bed system seems like a good way to slow down the water velocity and retain gravel near the road. WESSA noted that the ongoing hand-labourer maintenance, mentioned with regard to the arrestor bed was great. | Noted. This has been investigated, but the down fall of this system is that the water would have to be concentrated into the silt trap and the water velocity at the outlet would cause scour, as opposed to allowing the smaller catchments to cross the road where they encounter the road. |
| 275. | | | <p>Reviewed Section 2.3.4 of the DSR on Material Sources and urged the team to look at sources of basaltic soil within Lesotho, and to talk to the Lesotho Transport Department who build and maintain good quality dirt roads in difficult mountainous conditions.</p> <p>Expressed concern whether Phase 1 borrow pits will provide sufficient materials for Phase 2, as Phase 1 construction has halted due to a lack of suitable materials.</p> <p>Noted the inconvenience experienced by the local community resulting from the apparent delays with Phase 1 as a result of problems associated with obtaining road construction materials.</p> <p>Requires verification that the approved borrow pit for Phase 1 has suitable and adequate material for Phase 2 and requested confirmation of the authorisation of the borrow pit. Suggest that sources other than those identified for Phase 1 are considered.</p> | <p>Comment noted.</p> <p>The Project Engineers and the Lesotho Ministry of Tourism, Environment and Culture have met to discuss the possibility of sourcing gravel from Lesotho to maintain the Pass (indefinitely) which the Lesotho Government has rejected as the surrounding area forms part of the Sehlabathebe National Park and WHP.</p> <p>It has been confirmed that the borrow pits have sufficient suitable quantities of the material required.</p> <p>The problem with Phase 1 has been access to the borrow pit and quarry rather than the quality of road building material.</p> <p>The Phase 1 Engineers have verified that the material from the approved borrow pit on Phase 1 has suitable and adequate material for Phase 2. The Phase 1 Engineers have also verified that the EIA authorisation also covers the use of the materials for Phase 2.</p> |
| 276. | | | Requested that in terms of 2.3.5 of the DSR, WESSA would | Noted. The Engineers will welcome and initiate further |

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| | | | like to see further consultation between themselves and the design team with regard to individual places along the route, such as what happened in the early stages of design. WESSA hopes that the engineers will be open-minded enough to accept solutions which seem anathema to their training, but are based on first hand experience of the pass such as water flowing over the road surface rather than under it. | consultation. Once the Draft Environmental Impact Report is available with all parties aware of the options, impacts and proposed mitigations, a site visit could be arranged to look at some specific areas and discuss real and practical solutions. |
| 277. | | | Appreciates the commitment of the engineers to finding solutions by taking into account the many unique properties of the route. | Noted. |
| 278. | | | In terms of Section 2.3.6 on drainage, WESSA urged the engineers and the department to view water flowing over the road with open minds and to discuss ideas with experts of the pass such as Mr. Mike Clark, who has more actual on-the-ground experience of conditions on the Pass under all types of weather than anyone else. | Noted. |
| 279. | | | Suggested that water flowing over the road in a number of locations offers the best solution from an aesthetic and practical point of view. WESSA then noted that flooding has seldom caused the road to be closed, in addition, the damage caused by drainage was a result of the approaches to the crossing not being up to standard. | Noted. |
| 280. | | | With regard to Section 2.3.7 of the DSR on pavements, WESSA urges the design engineers to pay more attention to using a gravel surface by researching other substances that can be added to the gravel to reduce dust and destruction of the gravel surface. Noted that whilst the efficacy of such substances may be doubtful, research should be done as part of this process. | Noted. |
| 281. | | | Expressed, with reference to Section 2.3.8 of the DSR, that they are encouraged by the recognition of the complex issues surrounding the actual construction phase. | Noted. |
| 282. | | | Questioned what will happen if the SA Border post does not move before construction is due to begin and whether everyone would be accommodated at the existing Phase 1 site. WESSA also questioned whether approval for the continued use of this site has been given by the landowners | Negotiations have been initiated with the Border Control to utilise a portion of the property as the Camp site. To our understanding the camp site for Phase 1 will be utilised for Phase 2. |

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| | | | (Sani Pass Hotel). | |
| 283. | | | WESSA is unhappy at the large amount of traffic to be using the whole road during construction as this has a negative impact on the tourism value of the area. | Noted. Arcus GIBB recognises this as an issue and will attempt to ensure that the road users needs are accommodated where possible during construction, should the development be authorised. |
| 284. | | | Noted that Section 3 on alternatives is a very useful way of taking the process forward. | Noted. |
| 285. | | | Expressed concern that the preferred option is given as Alternative 5 and this Alternative must be reconsidered in light the current global economic climate. | Noted, however, Alternative 5 is the Proponent's preferred option and will be assessed in the EIA as such. The Economic Study will examine the economic cost- benefits of the alternatives considering current and future economic conditions. |
| 286. | | | Disagrees that Alternative 1 should result in the road being closed, as it is an extreme assumption because the road has continued without any meaningful maintenance for the last 10 years without having to be decommissioned. | Refer to Chapter 3.1 which describes the reason why Alternative 1 results in the Sani Pass having to be closed the public. In addition, recent history has documented continued degradation of the Sani Pass, which would increase exponentially should no steps be taken to prevent the current degradation. Ultimately the road will have to be closed. |
| 287. | | | WESSA would prefer Alternative 1 be assessed with the criteria of the road continuing in a poor condition, unmaintained, or else to split Alternative 1 into (a) closure and (b) road remains open. As a result the no upgrade option means that the road will remain open with some maintenance costs. WESSA further suggests that should the road be closed, rehabilitation must be funded by the Department of Transport and signed off by KZNW when completed. | Noted. Alternative 1 has been split into 1A: No-go and 1B: Closure options as suggested. Given a relatively short period of time, 1A causes continued environmental degradation to the point where the DOT and Ezemvelo KZN Wildlife (EKZWN) will call for the closure of the Pass. Should the Pass be closed, the DOT will be responsible for the complete rehabilitation of the Pass under the supervision and acceptance of EKZWN. |
| 288. | | | Suggests that an estimate of the costs of construction and ongoing maintenance costs would be useful on each of the alternatives. This would assist in assessing the relative merits of each alternative against their costs. | Noted. The Assessment phase of the EIA would attempt to provide this comparative data to ensure a detailed assessment. |
| 289. | | | Suggests that the impacts will be different for Alternative 1 should WESSA's above suggestion be accepted. | Noted. |

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| 290. | | | Disagrees that for Alternative 2 and 3, sourcing road material is a long term problem, as the solution lies in Lesotho. This has not been considered especially in the case of Alternative 3 where drainage has been improved and consequent loss of material greatly reduced. A great advantage of Alternative 3 is the reduced impact on roadside vegetation. | Noted. As referenced previously, the Lesotho Government have already indicated they will not allow sourcing of material for the road from their side of the WHP. In addition, even if Lesotho agreed, obtaining materials in close proximity to the Pass would not be possible as the eastern region of Lesotho forms part of the WHP. |
| 291. | | | Reviewed Section 3.4 of the DSR on Impacts on Tourism and suggested that should Alternative 1 be split it, would mean that the road would not necessarily need to be closed for tourists. Then this Alternative would retain the Pass as being a 4x4 nature route, of which tourist have noted to be an important element. This is the best option for such "adventure" tourism. | Noted. Alternative 1 has been split into 1A: No-go and 1B: Closure options as suggested. Given a relatively short period of time, 1A causes continued environmental degradation to the point where the DOT and EKZNW will call for the closure of the Pass Refer to Chapter 3.1 which describes the reason why Alternative 1 results in the Sani Pass having to be closed the public. In addition, recent history has documented continued degradation of the Sani Pass, which would increase exponentially should no steps be taken to prevent the current degradation. Ultimately the road will have to be closed. |
| 292. | | | Reviewed Section 3.4 of the DSR on Impacts on Tourism and expressed that the DSR assumes that for Alternative 2 and 3, the upgraded gravel surface will result in the Pass restricting non 4x4 vehicles, of which has been clearly demonstrated not to be the case. | DOT have indicated that should the Pass remain an upgraded gravel road as per Alternative 3 (potentially accessible by all vehicles), the DOT will still only allow 4x4 access to the upper section (from border post up) as the liabilities and risks to the DOT are unacceptably high, particularly with respect to accidents on the Pass. As such, the Alternatives Section of the DSR, bar the amendments to Alternative 1, is not erroneous and remains relatively unchanged. |
| 293. | | | As the upgraded gravel surface constructed by the Basotho1998 resulted in small sedan vehicles (eg Fiat Uno, Daihatsu Cuore) driving up and down the Pass for around two years thereafter, the lack of maintenance caused the surface to deteriorate. Strongly suggests that an in depth study be undertaken to establish: <ul style="list-style-type: none"> • What can be learnt from previous road construction. • The impact that improved access had on tourism | It is agreed that lack of maintenance has allowed the Pass to degrade to an unacceptable level. It must, however, be recognised that the Pass is in a continuous state of degradation, regardless of the maintenance and justified by the fact that the Pass needs continuous and regular maintenance to keep it useable. |

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| 294. | | | Highlights that the erroneous assumption that Alternative 3 restricts 2x4 vehicles. This assumption results in Alternative 3 not fulfilling a larger number of the project's aims. This is crucial as the general public and locals now will be able to fully utilize and benefit from the road. | DOT have indicated that should the Pass remain an upgraded gravel road as per Alternative 3 (potentially accessible by all vehicles), DOT will still only allow 4x4 access to the upper section (from border post up) as the liabilities and risks to the DOT are unacceptably high, particularly with respect to accidents on the Pass. The general public and locals will therefore not be able to fully utilise and benefit from an upgraded gravel road. |
| 295. | | | Disagrees that for Alternative 4 the top 8km of upgraded gravel surface will only be accessible to 4x4 vehicles. | As above, although the Pass may be accessible to 2x4 vehicles under Alternative 4, the DOT intend to enforce 4x4 access only. |
| 296. | | | Questions whether Alternative 5 will bring in new tourism opportunities and if so, what they are. Noted that evidence around Lesotho points firmly to the contrary | Noted. It is anticipated /assumed that improved access would improve or provide for new tourism opportunities. This assumption will be tested through the SIA (including tourism). Evidence / discussions held to date with the Authorities and local in Lesotho suggest that the improved accessibility of Alternative 5 will create new opportunities for them. |
| 297. | | | Reviewed Section 5 of the DSR on Impacts on local communities and noted that should the pass remain open with no upgrade or closure as for Alternative 1, the status quo will continue. | The status quo will remain as is for a short period i.e. a few local benefit retain their benefits while the remainder still have restricted or no benefit from the Pass in its current state. As noted earlier, in the medium to long term, Alternative 1 becomes environmentally unsustainable and will result in closure of the Pass, in which case the whole community loses. |
| 298. | | | <p>Stated that Alternative 2, is incorrect as it assumes that an upgrade will mean only 4x4s may use the road which is not the case.</p> <p>Stated that the current state of the Pass benefits the local community in a number of ways as follows:</p> <ul style="list-style-type: none"> • It is part of their heritage as South Africans and Basotho and has an inherent value • It has led to a dramatic rise in tourism, resulting in many sustainable tourism businesses in the KwaSani area, stable families living in the area and the creation of many direct and many indirect jobs. | <p>As noted above, although Alternatives 1-4 may allow access by 2x4 vehicles, the DOT will enforce 4x4 vehicles only due to the significant risks and liabilities to the DOT in the case of an accident or death on the Pass.</p> <p>The current state of the Pass on benefits a limited number and specific sector of the local community on both sides of the Border. The remainder of the communities have limited access and limited use of the Pass due to the 4x4 status. They also have restricted opportunities to use the Pass for their own initiatives.</p> <p>The impact of upgrading the Sani Pass will be assessed in the Heritage Study.</p> |

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| 299. | | | Highlighted that the economic study should present current data showing the tremendous growth especially as the data quoted so far are from many years ago. It was also suggested that a study should project the current and future growth rate for the next 10 years. | Noted. The Economic Study will attempt to consider and assess such data in its assessment. |
| 300. | | | Challenges that the cost of taxis on the pass is not significantly higher than on other routes. A taxi from Underberg to Pietermaritzburg costs around R65. A taxi from the Good Hope Store to Mokhotlong costs R70. | Noted. |
| 301. | | | <p>Noted, the assumption in the DSR which states that Alternative 3 and 4 would restrict non 4x4 vehicles. As a result the referred section of the DSR is incorrect.</p> <p>WESSA believes that for Alternative 3, the road will be open for the maximum amount of time as the dirt surface allows the road to stay open far longer in snow and ice.</p> | <p>AS noted above, the referred section of the DSR remains correct and valid as the DOT have indicated that the Pass will enforce 4x4 only status on the Pass should it remain a gravel road of any kind.</p> <p>The road surfaces options are currently under investigation by the Engineers to ensure a suitable road surface which is safe and accessible under most weather conditions.</p> |
| 302. | | | Questioned how substantially Alternative 5 would reduce travel times. | Alternative 5 may reduce travel times although not substantially. This comment has been corrected. Alternative 4 is not intended to reduce travel times significantly but it expected to reduce the travel distance between KwaZulu-Natal and Mokhotlong and also provide an alternative route for travellers from the western side of Lesotho. |
| 303. | | | <p>Reviewed Section 3.6 of the DSR on the Impacts on Road safety and advised that the safety issue for Alternative 1 would be the same as currently should Alternative 1 reflect the road would remain open.</p> <p>Questions how the state of road as reflected in alternatives 2, 3 and 4 would jeopardize safety, as the upgraded gravel surface would be of good quality.</p> | <p>Noted. However, over a short period road status would remain but begin to degrade over the medium term and continue to cause significant environmental damage to the WHP to the point where the DOT and EKZNW could possibly call for closure of the Pass. To this point of closure, the condition of the road would degrade, and with it, safety.</p> <p>Regardless of the quality of the upgrade, the DOT have stated that they will continue to enforce 4x4 only access to the Sani Pass should the Pass remain gravel.</p> |
| 304. | | | Advises that an all weather surface as described in Alternative 4 and 5, will definitely result in an increase in driver's speeding and a blasé approach of the driver's attitude. This will result in a dramatic increase in accidents, which can be fatal in such terrain. | Noted. The project team is aware of the issues regarding speeding, safety and negligence should the Pass become an all weather road with improved access for 2x4 vehicles. The project team is investigating a number of methods to control speed, improve safety and reduce accidents on the Pass. |

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| 305. | | | Stated that for Alternative 1, the impact on the link between KZN and Lesotho would remain the same should Alternative 1 be amended to include an option for the road to be open. | Noted. |
| 306. | | | WESSA is of the opinion that an upgraded dirt surface would allow for easier transit between KZN and Lesotho, would maximise opportunities for growth and would not restrict trade and movement. This opinion would be applicable for Alternatives 2, 3, 5 and upper section of Alternative 4. | Noted. |
| 307. | | | <p>Disagreed with the con (negative of pro) noted on Pg 28 - 30 of the DSR, that states a permanent labour team would be required for alternatives 2, 3 and 4. WESSA views this as a major pro as the permanent team could:</p> <ul style="list-style-type: none"> • Fill potholes before they form • Clear drains/pipes before they become clogged thereby not resulting in rivulets flowing down the middle of the road. • Returning the maximum amount of gravel which was washed off the road • Ensuring that rocks, logs etc do not block drainage lines or pipes and other general road maintenance. • Create long term, sustainable jobs • Ensure that the gravel surface remains in good condition with the road open to normal traffic. | <p>Noted, however discussions with the DOT and Engineers indicated that having an unskilled permanent labour force would pose a safety risk and additional cost to the DOT which has its own permanent Road Maintenance Department.</p> <p>The potential positive and/or negative impacts that could arise due to the required labour force for each alternative will be assessed in the Impact Assessment Phase of the EIA.</p> |
| 308. | | | Expressed concern that the DOT do not use hand labour. Instead of maintaining the road with hand labour DOT rather waits until a machine is needed, or becomes available. In addition, hand labour creates jobs for many rather than one machine operator. WESSA would like to see this proposal getting serious consideration in the EIA report. | <p>Noted. As above, the DOT and Engineers have indicated that having an unskilled permanent labour force would pose a safety risk and additional cost to the DOT which has its own permanent road maintenance teams.</p> <p>This issue will be further assessed in the Impact Phase of the EIA.</p> |
| 309. | | | Disagrees with Pg 28 of the DSR, Table 6, which states that there will be no growth in tourism for Alternative 2. Tourism on the Sani Pass has continued to grow annually over that last 15 years with no signs of slowing down. In addition due to the incorrect assumption that non 4x4 vehicles are restricted in Alternative 2, the outcomes documented in other categories such as "impact on road safety" and "impact on | <p>Noted. Table 6 has been corrected to reflect limited tourism growth potential. The impact on tourism will be assessed as part of the SIA.</p> <p>As above, the DOT will continue to enforce 4x4 vehicles only on the Pass even if upgraded. As a result, the Alternatives are described are relatively accurate and applicable.</p> |

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| | | | community' are also incorrect. | |
| 310. | | | <p>Disagrees with the statement in Table 7 of the DSR which states that the impact causes at the top of the Pass are not dealt with. Should Alternative 3 include sorting out the drainage, then the impact causes will be dealt with. Alternative 3 will result in the following:</p> <ul style="list-style-type: none"> • Pass will be completely accessible to all tourists. • Pass closures will be minimum • There will be potential to maximize socio-economic linkages with Lesotho • Pass open to non 4x4 vehicles | <p>Noted. A loose gravel surface will still erode and be washed away and create secondary and tertiary impacts (e.g. clogging of drains and impact on river).</p> <p>It is recognised that Alternative 3 meets a number of the required criteria but is fatally flawed in that it will still only be accessible by 4x4 (as per the numerous explanations above) and is potentially fatally flawed in that it is environmentally unsustainable in the long term and with no sources of infinite building materials.</p> |
| 311. | | | <p>Highlighted that Alternative 4 is inconsistent with the other alternatives in Table 7 of the DSR, and questions why Alternative 4 would result in lengthy Pass closures.</p> <p>WESSA further disagrees that Alternative 4 will result in no growth in tourism and states that Alternative 4 will result in the Sani Pass being fully accessible to non 4x4 vehicles and will have growth and development.</p> | <p>Errors in Table 7 were found whereby impacts on Community and Road Safety had been swapped. These have been corrected.</p> <p>Alternative 4 will still be restricted to 4x4s only as discussed above and therefore not share the potential benefits of being fully accessible to all.</p> |
| 312. | | | States that Alternative 5 will result in the experience of Sani being destroyed, therefore it will not be open to all. Russell & Simone Suchet queried what other opportunities Alternative 5 will result in. | Noted. This issue is a direct tourism /social issue and would be addressed in the SIA and Assessment Phase. |
| 313. | | | Notes that the DSR makes no mention of the current tourism or the impact the proposed development will have on tourism ventures in Eastern Lesotho, of which is an important factor and needs to be assessed. | Noted. This issue is a direct tourism /social issue and would be addressed in the SIA and Assessment Phase. |
| 314. | | | Notes that Alternative 5 will result in increased Pass closures, especially during icy and snow conditions in winter. | Noted. Alternative 5 states that there will be reduced pass closures and this would be primarily due to the storm water being managed more effectively. The side drains at the positions on the pass where ice is experienced will be increased in size and depth in order to minimise the risk of ice build up on the road. |
| 315. | | | Disagree that Alternative 5 will result in an increase in tourist traffic and stated that there will be a decrease, which is indicated in the WESSA survey. | The impact on Tourism, both positive and negative will be assessed in the Tourism Study as part of the SIA. |

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| 316. | | | Questioned why Alternative 6 is being discussed as it is too unpractical. | Alternative 6 was included to show the complete range of options that the DOT and Engineers have considered. This should include extreme options on either end of the scale. Alternative is not a practical or feasible Alternative. |
| 317. | | | States that the report does not document the important factor of the current tourism situation in Lesotho or the impact that tarring the road will have on the highlands and existing tourism ventures. | Tourism in Lesotho is being presented and assessed in the Tourism Study as part of the SIA. |
| 318. | | | Expresses the opinion that the upgrade will result in a decrease of tourist traffic as indicated by the WESSA survey, in which a large percentage of the tourists indicated they will not come to the Sani Pass should it be tarred. | Other opinions contend that a more accessible Pass will bring new tourists. This issue is being investigated in the SIA. |
| 319. | | | Highlighted that quad biking seems to have been outlawed and the quad-biking operators have closed down their operations. | Noted. |
| 320. | | | Expressed concern that Section 4.6.1 (c) in the DSR on tourism enterprises in Lesotho does not include Molumong Lodge, the pony trekking operator based there, St. James Guesthouse and the community tourism enterprise at No 10 Riverside. | Noted. These tourism enterprises have been included in the SIA. |
| 321. | | | WESSA hoped to view quantitative data on how many families are split across the border and the movement of people from Mokhotlong to South Africa through the Sani Pass, related to health care and education. | This information is still being gathered through the SIA and Economics Study. |
| 322. | | | Stated that section 4.6.2 on economic context is hopelessly out of date and thus totally misleading in its conclusions. WESSA looks forward to the economic survey expected to produce up to date data on population, employment and incomes. | Noted. It is important to note that the aim of the scoping report is to identify areas at which further study is required. An economic impact assessment would be undertaken as such. |
| 323. | | | Challenges 4.7 (d) in the DSR on seasonality as there is no real tourism season and while there are peaks and troughs, tourism on the Pass is constant. | Noted and amended. |
| 324. | | | <p>Stated that the attendance at the Open Day/Public Meeting was poor, compared with the public meeting held to discuss Phase 1 some years back. This was due to:</p> <ul style="list-style-type: none"> The meeting not being as widely publicised as the public notification for the start of the EIA process, which was | <p>Comments noted.</p> <p>Initial public notification aimed to inform as many IAPs as possible and encourage as many as possible to register (noting that IAPs can register at any point during the EIA process). All subsequent correspondence is thereafter limited</p> |

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| | | | <p>excellent</p> <ul style="list-style-type: none"> • The meeting was advertised relatively close to the date it took place on. • The first weekend in December was not a good time with many people busy or away. • Saturday was not the most appropriate day <p>Advises that the next meeting be out of school holidays and on a weekday.</p> | <p>to the registered IAPs. As such, Arcus GIBB informed approximately 500 IAPs of the meeting. Discussions with other consultants indicated that Saturday was the preferred meeting date although IAPs not indicate to the contrary. The next meeting will be on a weekday.</p> <p>In terms of the meeting date, the aim had been to release the DSR prior to Christmas to give IAPs extended review the while not holding back the EIA process.</p> |
| 325. | | | <p>Suggests that it is imperative that the terms of reference for the economic study should be broad enough to review the entire economic effects of the project.</p> <p>This means that the economic situation and future impacts need to be assessed not only for the KwaSani area, but for Mokhotlong, Butha Buthe area and/or eastern Free State towns where traders from Mokhotlong currently travel to.</p> | <p>Noted. The Assessment Phase of the economic study will focus on impacts from Mokhotlong and surrounding areas of Lesotho east into KZN</p> |
| 326. | | | <p>Suggests for the construction phase that an Environmental Control Officer is used and be engaged to be present throughout the construction on a daily basis, interacting with all members of the construction team, particularly drivers of heavy earthmoving equipment.</p> | <p>Noted. an ECO will be appointed for the duration of the entire construction phase. Options are being considered which include trained assistants or 'deputies'.</p> |
| 327. | | | <p>Advised that for the project to be sustainable there must be successful rehabilitation of the construction footprint, therefore it is imperative that a dedicated and adequate rehabilitation fund is secured up front.</p> | <p>Rehabilitation has been recognised as a critical component of the construction process. The rehabilitation fund will be discussed with the DOT.</p> |
| 328. | | | <p>Requested that the knowledge and methods employed by Dr Pooley (Flora Specialist) be implemented, continuing from the assessment phase, through to the construction and post-construction phases of the project. Noted that Dr. Pooley is highly regarded in her knowledge of the plants in the area and is an expert in this field.</p> | <p>Noted. The Botanical study by Dr. E. Pooley has been continued into the Assessment Phase of the EIA.</p> |
| 329. | | | <p>Advised that plant rescue is important and must be initiated in the appropriate season with adequate time given for a successful operation.</p> | <p>Noted. Such recommendations will be guided by Dr. Pooley and incorporated into the EMP.</p> |
| 330. | | | <p>Noted that attention to areas which were degraded due to drainage problems is a matter of extreme importance.</p> | <p>Noted and agreed.</p> |

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| 331. | | | Requested that the rehabilitation of the flora does not end at completion of construction, but rather continue to the satisfaction of Ezemvelo KwaZulu-Natal Wildlife. | Noted. EKZNW closely participate in this process, to ensure management of the UDP WHS. |
| 332. | | | <p>Noted that the Plan of Study for EIA on page 75 of the DSR is does not discuss floral, avian or terrestrial faunal studies while the Report includes a botanical species list only. WESSA advises that additional studies on the flora and fauna species and their habitats may be important when one considers potential cumulative impacts.</p> <p>WESSA looks forward to the identification and assessment of cumulative impacts.</p> | <p>Noted. Refer to Chapter 6.4.3 where reference is made to the Botanical study to be undertaken in the Assessment Phase of the EIA. A desktop avian study was undertaken by the late Prof Piper which reviewed avifauna in the area and reflected on the potential environmental impacts on the birds and possible mitigations measures and was considered adequate for the purposes of this project. The study will be reviewed and discussed with EKZNW.</p> <p>Due to the nature of the project being the upgrade of an existing road within a road servitude (as opposed to new road), and with EKZNW's knowledge of the area, a terrestrial study was not considered necessary. However, mitigation measures to prevent or avoid any potential impact on fauna will be included in the EMP.</p> <p>Due to the nature of the project on an existing road within road servitude and the EKZNW's knowledge of the area, a separate Terrestrial Fauna Study was considered unnecessary. However, mitigation measures to prevent/avoid impact on fauna will be included in the EMP.</p> <p>The Impact Assessment Phase will include an assessment of cumulative impacts.</p> |

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| 333. | | | <p>Proposes that Alternative 3 is the best solution as:</p> <ul style="list-style-type: none"> • It will satisfy ecological requirements with the upgraded drainage and reduced erosion • It will satisfy tourism requirements as the 4x4 fundis and tour operators may prefer the road to remain open only to 4x4 vehicles, but an upgraded dirt surface allows the area to retain its sense of place and hence its tourism value while increasing accessibility. • It will satisfy trade requirements as an upgraded dirt surface will: <ul style="list-style-type: none"> - Increase accessibility to trade vehicles - Remain open for the maximum days in the year - Reducing maintenance costs from the current situation - Meet safety requirements as speeds will still be very low, drivers will still need to use intense concentration and the surface will be the best under snow and icy conditions. • In addition, if it is combined with a well structured ongoing maintenance plan, it should ensure the road is kept at a high standard while providing long term sustainable employment. Thus the benefits sought from Alternative 5 will be achieved at a fraction of the cost and a fraction of the impact on the road reserve and fringes. | <p>The motivation for Alternative 3 is noted. It is also acknowledged that Alternative 3 meets a number of the required criteria but will still only be accessible by 4x4 (as per the numerous explanations above) and is therefore potentially fatally flawed in that it is environmentally unsustainable in the long term and with no sources of infinite building materials. It will, however, be assessed in detail in the Impact Assessment Phase.</p> |
| 334. | <p>Russell & Simone Suchet Sani Lodge Backpackers and Drakensberg Adventures</p> | <p>IAP051 (23/01/2009)</p> | <p>Congratulated the EIA Consultants on the job done so far. Acknowledged that the report has endeavoured to cover all the many issues raised about the project and has acknowledged the many shortcomings and unanswered questions. The 6 alternatives proposed for the road is a good way forward to find the best solution to the problem.</p> | <p>Noted.</p> |
| 335. | | | <p>Stated that in their opinion, the Scoping Report makes incorrect assumptions and a number of erroneous conclusions, some of which are crucial in comparing the various alternatives. Russell and Simone Suchet's comments therefore concentrate on pointing out these inaccuracies.</p> | <p>Noted – amendments to the DSR (FSR) will be considered.</p> |
| 336. | | | <p>Expressed strong disapproval with the ongoing construction works for Phase 1 as they are residents living at the 10.5km</p> | <p>The project team is well aware of the issues related to actual construction of the Phase 1 road and will try to ensure that</p> |

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| | | | <p>mark. With reference to how Phase 1 construction is affecting them, the points below were noted.</p> <ul style="list-style-type: none"> • There has been extensive construction on the road from April 2005 to presently, and the road is far from complete with on-going stop and go disruptions, rough road surfaces and punctures to tyres, detours, and dangerous driving by heavily laden trucks • Suffered from severe noise pollution, impacting their ecotourism business, and personal psyche • Suffered from a serious dust problem, especially in the dry seasons • Whilst some disruption to business and personal lives are quite acceptable in the greater public good, they feel that around 4 years of constant disruption are enough for anyone to have to tolerate for the public good. <p>Cognisant of the above, the Suchet's highlighted that if Phase 2 is approved, they will be subject to an absolute minimum of another 3 years of more of the same disruptions.</p> | <p>lessons are learnt from the process and not repeated for Phase 2.</p> <p>Arcus GIBB acknowledges the concerns related to the Phase 1 but note that Phase 1 is not a project of the Phase 2 team and the projects are not related in anyway. We also recognise that your establishment is directly adjacent to the P318 under construction and expect that construction on the Phase 2 section will have significantly less impact on you and your establishment. Possible additional mitigation measures can be discussed to further limit the impacts.</p> |
| 337. | | | <p>Noted that in order to uphold the crucial aims of NEMA the impact assessment must assess the following:</p> <ul style="list-style-type: none"> • The sustainability of the 6 alternatives put forward. • The micro and macro-environment including the effects on international linkages. • Studies should look at the quantitative impacts on Mokhotlong in Lesotho as well as the effects of increased trade and/or tourism via the Sani Pass on the Butha Buthe area, the whole Lowlands area of Lesotho and even the Eastern Free State. <p>Noted that as tour operators running tours into Lesotho, they have some appreciation of the "bigger picture", and feel that the scope of study so far has been too narrow.</p> | <p>The EIA Arcus GIBB is undertaking will include the aspects highlighted but will focus primarily to the Mokhotlong region of Lesotho. Undertaking tourism and economics studies for most of Lesotho and the Eastern Free State is not realistic.</p> |
| 338. | | | <p>Noted as per the DSR that the NEMA further states that a cautious and risk-averse approach is implied by sustainable development. Therefore from the perspective of owners of</p> | <p>Point noted, however Arcus GIBB must point out that the proposed project is for a hardened surface and does not imply the road will be tarred. As proposed in the DSR, a concrete</p> |

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| | | | <p>tourism business based largely on the Sani Pass and eastern Lesotho, a concrete and well defined present with its attendant growth path (a scenario based on the Sani Pass as a “wilderness experience” on a gravel surface) would be the preferable route over some ill-defined future, based on tarring the road and “killing the goose which lays the golden egg”.</p> | <p>road (which can be made to look like gravel) is the most favourable option at this stage.</p> <p>The social, tourism and economic assessments will attempt to determine the impact of a hardened surface on the “wilderness experience”.</p> |
| 339. | | | <p>Referred to Section 1.4.5 of the Scoping Report and stated that the Sani Pass Road itself is an asset of national heritage significance. It has a tremendous history attached to it, and the upgrade threatens to alter it. Therefore the Suchet’s urged that the heritage specialist assess the whole road rather than looking for individual heritage sites along the way.</p> | <p>Noted. Refer to Chapter 6.8</p> <p>The Heritage Study is aware of that the Pass itself is a asset of national heritage significance and will assess the significance thereof in addition to individual heritage sites.</p> |
| 340. | | | <p>Notes that in section 1.4.6 (a) of the DSR, for the first time since the project was proposed that the real motivation for the project was presented.</p> <p>Stated, the motivation, that the project is part of a regional transport/communications plan has a laudable aim, which the Suchet’s fully support. Although as a result, the Suchet’s believe that the decision was made by people who have no idea of the situation on the ground.</p> <p>Suggests that a far better way to achieve the SADC aims would be to keep the Sani Pass and all the roads in the Eastern Lesotho highlands as gravel surfaces because:</p> <ul style="list-style-type: none"> • The road is part of the appeal of eastern Lesotho to tourists and gives the sense of remoteness • Tarring roads all over Lesotho may bring more vehicles to the area, but they will traverse rapidly through the country and Lesotho will see little benefit from the “day-trippers” • The type of tourists who seeks the wilderness, the sense of remoteness are the type of tourists who will stay longer in the country, and who will thus use services provided by local tourism businesses to the benefit of the country as a whole. | <p>Noted. This however, is only part of the motivation as the project also aims to protect the environment from further degradation. This could solely justify the need to upgrade the Pass.</p> <p>Maintaining the Sani Pass and the roads in Lesotho as gravel roads is not environmentally sustainable in the long term as material will always have to be obtained from a suitable source. Indefinite mining from a borrow pit will have significant environmental impacts at the source and where the material is washed off the roads.</p> <p>Tourism issues are being assessed through the SIA (which includes tourism).</p> |

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| 341. | | | Advised that the SADC and Lesotho should have detailed studies of the tourism situation and the future tourism potential in eastern Lesotho before such ill conceived and far reaching projects are proposed. | Noted. Arcus GIBB will enquire as to which representatives are responsible for such studies and forward on the suggestion. |
| 342. | | | Suggests that as part of the Impact Assessment process, the top decision makers from SADC, as well as from both the South African and Lesotho governments, visit their area on a fact finding mission of which the public may make submissions to such a delegation. | Noted. Arcus GIBB will pass the suggestion on to the client and Lesotho Government. |
| 343. | | | Challenges that the MDTP can contend that tarring the Sani Pass will lead to sustainable livelihood opportunities for people in eastern Lesotho, without supporting evidence as from personal experience believe that the result will be quite the opposite. | The statement referred to considers the upgrading of the Pass in the broader context – not just the ‘tarring’. The assumption that the upgrading will conserve globally significant biodiversity and cultural heritage and contribute to socio-economic growth through sustainable livelihood opportunities will be validated through the EIA process. |
| 344. | | | Noted that the World Heritage Site Integrated Management Plan (WHS IMP) states that “roads that are heavily used should be all-weather” however, the Suchet’s suggest that the Sani Pass is not and never has been heavily used, and neither is it ever likely to be. As a result there is no need to upgrade the road in terms of the WHSIMP. | Noted. The Sani Pass road utilization has been assessed in the Traffic Impact Assessment undertaken by VelaVKE in Phase 1 to be reviewed as part of the Impact Assessment Phase. |
| 345. | | | Stated that the IDPs, look to provide growth and employment to people, however, tarring the Sani Pass will provide short-term employment during the actual road construction, but that it will result in harm to the tourism industry and thus lead to a long term decline. As was the case in the St. Lucia debate. | Noted. This comment has no supporting evidence but it one of the issues being assessed in the SIA. |
| 346. | | | Contends that eco-tourism provides the best potential for future economic growth in KwaSani Municipal area and the Mokhotlong District. This clearly means leaving the road between Good Hope and Mokhotlong as a gravel surface. | Noted. No substantiated facts are provided to prove that hard-surfacing the road will not allow tourism and economic growth in the region. The opposite may be true and will be assessed in the SIA and Economic Study. |
| 347. | | | Expressed concern that Departments of Transports (DOT) motivation section 2.2.1 in the DSR presents DOT as implementing orders, where a political decision was taken to do the upgrade the Sani Pass prior to any consultation with local communities on either side of the border. | Noted, however, the decision to consider the upgrading of the Pass may have been made without consultation, but the final to undertake the Pass will not commence until the appropriate authorisations have been received (which would include some level of public consultation). |
| 348. | | | Noted that the economic benefits listed in Section 2.2.1 are laughable | Noted |

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| 349. | | | Questioned who will be accessing the UDP from Lesotho. And whether there is clear evidence of frustrated travellers trying to access the UDP from Lesotho | Discussions with Basotho's indicated that large numbers of locals use, and will continue to use the Pass - including those who have not been able to because of the condition of the Pass. |
| 350. | | | Noted that the upgraded Sani Pass road is 150km shorter than existing flatter route via the Free State and the N3, however WESSA questions, if commercial traffic will use the Sani Pass route with the steep and winding mountain passes. Negotiating this route will thus take longer using more fuel. | Noted. The SIA and Economic Study will identify potential users and their willingness to either take the route around Lesotho or use the route through Lesotho. The decision to use either route will be at the traveller's discretion but would at least provide an alternative. |
| 351. | | | Advised that the proposed development will not open up for tourism in eastern Lesotho. Tared roads exist in Lesotho into the highlands, from Butha Buthe via Oxbow to Mokhotlong and from Hlotse to Katse Dam, however in neither case has meaningful tourism development taken place as a result. Stated that tarring a road on its own does not draw tourists. Rather, it would be more prudent to study what tourism initiatives are succeeding currently and to build on it. Tourism growth in Lesotho is largely based on small scale community tourism initiatives, based on Basotho culture, pony trekking and hiking. These are all enhanced by keeping the sense of remoteness which the Lesotho highlands have as their biggest asset. | Pointed out. It is however necessary to point out that there is no evidence to show that current initiatives will not continue. Tourism in Lesotho may also be restricted to small scale community initiatives due to the limited access to the region. The SIA will consider current and potential tourism opportunities. It should also be noted that eastern Lesotho, which although tarred, does not have tarred access roads thereby limiting admission to the region. Furthermore, should access be improved (by whatever means) there are other potential tourism opportunities in the region, in addition to current small scale initiatives, as has been recognised by the Lesotho government and Tourism KZN. |
| 352. | | | Expresses hope that the economic and social specialist studies will visit the Suchet's and get their statistics and ideas as part of the process. | Noted The Assessment Phase of the economic study will include site assessments, interviews, and data collection from all relevant tourism facilities such as Sani Lodge Backpackers (the Suchet's) as input to the analysis. |
| 353. | | | Opposed the DOT motivation that the proposed upgrade will build business links between Mokhotlong, Underberg and Pietermaritzburg is taken as a certainty. Suggests that an in depth study is required to determine the above. | Noted. The economic study will establish whether business links will be built in these areas. |
| 354. | | | Suggested there should be an investigation to determine whether the customs requirements at the border post are the biggest obstacles to trade on the Sani Pass. In addition, increased trade via the Sani Pass may result in a decline in trade in other areas, such as the trade between Mokhotlong and Butha Buthe or the towns in the eastern Free State. | Noted. Economics specialist will be made aware of the customs requirements in consideration in their study. The study should also determine who will benefit from the road. |

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| | | | Noted that due to the above statement, trade may not increase but merely alter who will benefit. In addition, an upgraded gravel road will achieve the same ends at a fraction of the cost and disruption. | |
| 355. | | | Questioned, that in terms of section 2.2 of the DSR, whether accessibility will be increased as WESSA is of the opinion that a gravel surface on the top section of Sani Pass is the best surface, to ensure the road is open for the maximum number of days a year. The road was closed due to a massive thunderstorm in 2001, otherwise only snow and ice have closed the road. An all weather surface will become far more treacherous in such conditions than a gravel surface and will thus lead to decreased accessibility. Noted that even a tarred road would have been affected by the heavy storm in 2001. | <p>Noted. However, as mentioned previously, a gravel road is not sustainable and fatally flawed as their no material to continually replenish lost soil indefinitely. The Engineers are looking into a hard-surfaced all-weather road which will have the benefits of a gravel road but is not easily erodible.</p> <p>It should also be noted that although the intention is to create an all-weather road, which is accessible under as many weather conditions as possible, but not necessarily extreme weather conditions. It is accepted that the Pass will still be closed under extreme weather conditions.</p> |
| 356. | | | Advised that a new scenic tourism route can be opened up without an all weather surface but with a good quality and well maintained gravel surface. This will achieve the same results at a fraction of the cost/disruption. Namibia's extensive network of gravel roads illustrates gravel roads can be the basis of a highly successful tourism product | Noted. Ignoring the comments already made discussing the potentially fatal flaws in an upgraded gravel road, the Sani Pass has a very unique terrain and climate and as such cannot be compared to Namibia which has a completely different climate and rainfall regime. Further investigations into tourism needs will be undertaken in the Assessment Phase of the EIA. |
| 357. | | | Agreed that drainage at the top of the Pass is a great concern and as such they support its improvement. However disagreed with the DSR which states that the there have been frequent road closures due to the gravel surface As there is no supporting evidence of this statement. It is factually incorrect and creates totally the wrong impression. | Noted. This statement will be revised. |
| 358. | | | <p>Motivated that if a gravel road was constructed with proper drainage the following would be achieved:</p> <ul style="list-style-type: none"> • Improved drainage will result in greatly reduce the amount of gravel loss off the road surface. I • Reducing gravel lost with a dedicated full-time maintenance team to ensure that gravel is put back on the road from drains, pipes etc on a regular basis, • Easy to find gravel as high quality road building material is available within 10km of Sani Top, in Lesotho. It is basaltic soil, and without being experts, from the | <p>Noted.</p> <p>However the option of an upgraded gravel road is flawed in the following respects:</p> <ul style="list-style-type: none"> • No matter how efficient the drainage is, at grades of >20%, the Pass will still suffer gravel loss and this will still block the pipes and end up in the rivers creating an environmental impact • The Project Engineers and the Lesotho Ministry of Tourism, Environment and Culture have met to discuss the possibility of sourcing gravel from Lesotho to maintain the |

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| | | | <p>experience of local tour guides over many years in eastern Lesotho, are convinced that reason, gravel roads in Lesotho are usually in a good condition and drivable even in very wet conditions and is due to it being built on basaltic soils</p> <p>In addition, since the purpose of the project is touted on a cross-border initiative, there should be no issue with Lesotho providing road material to the gravel surface of the road.</p> | <p>Pass (indefinitely) which the Lesotho Government has rejected as the surrounding area forms part of the Sehlabathebe National Park and uKhahlamba WHP.</p> <ul style="list-style-type: none"> Such a gravel road requires regular maintenance and continuous gravel replacement. In addition to there being a lack of suitable material in the area, sourcing gravel indefinitely is environmentally unsustainable and creates an environmental impact at the source no matter how much control is implemented. This is unacceptable and renders this option flawed, if not fatally flawed. Continuous gravel replacement implies gravel loss which will inevitably end up in the Mkomazana River causing direct and indirect impacts – which is also not acceptable. In addition to the above comment, obtaining gravel from within 10kms of Lesotho, as has been suggested, is not possible as this area is still part of the uKhahlamba World Heritage Park. All borrow pits MUST be outside of the WHP. |
| 359. | | | <p>Agrees that that erosion causes siltation in the Mkomazana River, however, questions how much runoff occurs due to the road itself. Suggests that a specialist study should be undertaken to quantify it by using a comparative study between streams elsewhere in the range where no road exists to compare how much “natural” erosion takes place and how much erosion is due specifically to the road in its current state.</p> | <p>Noted. The Aquatic specialist study in the Assessment Phase will attempt to determine the impacts on the riverine system resulting from use of the Pass using methods they feel appropriate.</p> <p>A Hydraulic Study being undertaken by the Engineers will determine quantities of water entering the system and how this is affected by the Pass.</p> |
| 360. | | | <p>Stated that if drainage is improved, even with a dirt surface, the amount of silt reaching the river will be reduced.</p> | <p>Noted. This silt could still have a significant environmental impact and the initial problems remain i.e. soil erosion and impact on the riverine system.</p> |
| 361. | | | <p>Noted, that Paragraph 3 raises the issue of dust, which the Suchet’s believe to be highly exaggerated, with no supporting evidence as the travel speeds on the Pass are very extremely low and as a result the dust problem is far less than, for example, on the Phase 1 section.</p> | <p>Noted. However, the point under criticism notes the potential impact of dust as has been experienced on gravel roads (generally) and aims to prevent such impacts occurring on the Sani Pass. Some dust is generated by vehicles on the Pass and therefore has the potential to impact on the adjacent verge vegetation.</p> |
| 362. | | | <p>Notes that at present, the road has been designed as though Alternative 5 is already approved. The Suchet’s suggest that as part of the process, the road should be designed as</p> | <p>Noted. The road design is far from complete and has up to this point tried to take into consideration all environmental considerations.</p> |

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| | | | though Alternative 3 is approved, would be the ideal alternative. | In terms of the Scoping Process, the DOT has to apply for their proposed (preferred) design (Option 5) while considering other possible/suitable options - of which Option 3 is one. Option 3 is not the proponent's preferred option and the road has therefore not been designed as such. |
| 363. | | | Reviewed Section 2.3.3 of the DSR on Shotcrete and disagrees that shotcrete is the perfect cure for all ills, as one cannot turn concrete, however tinted or moulded, into nature. Chapmans Peak is an example of the use of shotcrete, with an ugly result. In addition Chapmans Peak is currently closed due the unstable slope, despite the millions spent on the project. Noted other examples of concrete stabilisation measures that looked ugly and expressed concern that the Sani Pass will look like a great dam wall when complete. | Noted. The services of a Mountain Pass Geotechnical Specialist have been commissioned to undertake the geotechnical study and assist with bank and slope design. Stabilisation of the Sani Pass "switchbacks" is definitely required and the most appropriate method will be applied to achieve this. The Visual Impact Assessment (VIA) will provide recommendations to minimise aesthetic impacts. |
| 364. | | | <p>Urged the team to look at sources of basaltic soil within Lesotho, and to talk to the Lesotho Transport Department as they do build and maintain good quality dirt roads in difficult mountainous conditions.</p> <p>Stated that it is far fetched that the Phase 1 borrow pits have sufficient materials for Phase 2. Noted that construction of Phase 1 has halted due to lack of suitable materials. As such the source of material for Phase 2 needs to be a full part of this EIA process, otherwise all other plans could founder.</p> | <p>Comment noted.</p> <p>The Project Engineers and the Lesotho Ministry of Tourism, Environment and Culture have met to discuss the possibility of sourcing gravel from Lesotho to maintain the Pass (indefinitely) which the Lesotho Government has rejected as the surrounding area forms part of the Sehlabathebe National Park and uKhahlamba WHP.</p> <p>It has been confirmed that the borrow pits have sufficient suitable quantities of the material required.</p> <p>The problem with Phase 1 has been access to the borrow pit and quarry rather than the quality of road building material.</p> <p>The Phase 1 Engineers have verified that the material from the approved borrow pit on Phase 1 has suitable and adequate material for Phase 2. The Phase 1 Engineers have also verified that the EIA authorisation also covers the use of the materials for Phase 2.</p> |
| 365. | | | Urged the engineers and the department to look at water flowing over the road with open minds, and to discuss with | Noted. |

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| | | | <p>experts such as Mr. Mike Clark who has more experience of conditions on the Pass under all types of weather than anyone else.</p> <p>Noted that there are a number of locations where water flowing over the road would be the best solution from an aesthetic point of view and from a practical point of view. Flooding has seldom caused the road to be closed, and where damage was caused, it was due to the approaches to the crossing being sub-standard.</p> | |
| 366. | | | <p>With regard to Section 2.3.7 of the DSR on pavements, urges the design engineers to pay more attention to using a gravel surface by researching other substances that which can be added to the gravel to reduce dust and destruction of the gravel surface. Noted that whilst the efficacy of such substances may be doubtful, research should be done as part of this process.</p> | Noted. |
| 367. | | | <p>Expressed, with reference to Section 2.3.8 of the DSR, that they are encouraged by the recognition of the complex issues surrounding the actual construction phase.</p> | Noted. |
| 368. | | | <p>Questioned what will happen if the SA Border post does not move before construction is due to begin and whether everyone would be accommodated at the existing Phase 1 site. The Suchet's also questioned whether approval for the continued use of this site has been given by the landowners (Sani Pass Hotel)</p> | <p>Negotiations have been initiated with the Border Control to utilise a portion of the property as the Camp site. To our understanding the camp site for Phase 1 will be utilised for Phase 2.</p> |
| 369. | | | <p>Expressed their unhappiness that there will be a large amount of traffic using the whole road during construction, which will have a negative impact on the tourism value of the area and impact on their business, which has had to put up with many years of disruption already.</p> | <p>Noted. Arcus GIBB recognises this as an issue and will attempt to ensure that the road users needs are accommodated where possible during construction, should the development be authorised.</p> |
| 370. | | | <p>Expressed concern that the preferred option is given as Alternative 5 as this alternative must be reconsidered in light the current global economic climate.</p> | <p>Noted, however, Alternative 5 is the Proponent's preferred option and will be assessed in the EIA as such.</p> <p>The Economic Study will examine the economic cost- benefits of the alternatives considering current and future economic conditions.</p> |
| 371. | | | <p>Disagrees that Alternative 1 should result in the road being</p> | <p>Refer to Chapter 3.1 which describes the reason why</p> |

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| | | | closed, as it is an extreme assumption because the road has continued without any meaningful maintenance for the last 10 years without having to be decommissioned. | Alternative 1 results in the Sani Pass having to be closed the public. In addition, recent history has documented continued degradation of the Sani Pass, which would increase exponentially should no steps be taken to prevent the current degradation. Ultimately the road will have to be closed. |
| 372. | | | Prefers that Alternative 1 be assessed with the criteria of the road continuing in a poor condition, un-maintained, or else to split Alternative 1 into (a) closure and (b) road remains open. As a result the no upgrade option means that the road will remain open with some maintenance costs. It was further suggested that should the road be closed, rehabilitation must be funded by the DOT and signed off by KZNW when completed. | Noted. Alternative 1 has been split into 1A: No-go and 1B: Closure options as suggested. Given a relatively short period of time, 1A causes continued environmental degradation to the point where the DOT and EKZNW will call for the closure of the Pass. Should the Pass be closed, the DOT will be responsible for the complete rehabilitation of the Pass under the supervision and acceptance of EKZNW. |
| 373. | | | Suggests that an estimate of the costs of construction and ongoing maintenance costs would be useful for each of the alternatives as it would assist in assessing the relative merits of each alternative against their costs. | Noted. The Assessment phase of the EIA would attempt to provide this comparative data to ensure a detailed assessment. |
| 374. | | | Disagrees that for Alternative 2 and 3, sourcing road material is a long term problem, as the solution lies in Lesotho. This has not been considered especially in the case of Alternative 3 where drainage has been improved and consequent loss of material greatly reduced. A great advantage of Alternative 3 is the reduced impact on roadside vegetation. | Noted. As referenced previously, the Lesotho Government have already indicated they will not allow sourcing of material for the road from their side of the WHP. In addition, even if Lesotho agreed, obtaining materials in close proximity to the Pass would not be possible as the eastern region of Lesotho forms part of the WHP. |
| 375. | | | Reviewed Section 3.4 of the DSR on Impacts on Tourism and expressed that the DSR assumes that for Alternative 2 and 3, the upgraded gravel surface will result in the Pass restricting non 4x4 vehicles, of which has been clearly demonstrated not to be the case. | DOT have indicated that should the Pass remain an upgraded gravel road as per Alternative 3 (potentially accessible by all vehicles), the DOT will still only allow 4x4 access to the upper section (from border post up) as the liabilities and risks to the DOT are unacceptably high, particularly with respect to accidents on the Pass. As such, the Alternatives Section of the DSR, bar the amendments to Alternative 1, is not erroneous and remains relatively unchanged. |
| 376. | | | As the upgraded gravel surface constructed by the Basotho1998 resulted in small sedan vehicles (eg Fiat Uno, Daihatsu Cuore) driving up and down the Pass for around | It is agreed that lack of maintenance has allowed the Pass to degrade to an unacceptable level. It must, however, be recognised that the Pass is in a continuous state of |

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| | | | <p>two years thereafter, the lack of maintenance caused the surface to deteriorate.</p> <p>Strongly suggests that an in depth study be undertaken to establish:</p> <ul style="list-style-type: none"> • What can be learnt from previous road construction. • The impact that improved access had on tourism | <p>degradation, regardless of the maintenance and justified by the fact that the Pass needs continuous and regular maintenance to keep it useable.</p> |
| 377. | | | <p>Highlights that the erroneous assumption that Alternative 3 restricts 2x4 vehicles. This assumption results in Alternative 3 not fulfilling a larger number of the project's aims. This is crucial as the general public and locals now will be able to fully utilize and benefit from the road.</p> | <p>DOT have indicated that should the Pass remain an upgraded gravel road as per Alternative 3 (potentially accessible by all vehicles), DOT will still only allow 4x4 access to the upper section (from border post up) as the liabilities and risks to the DOT are unacceptably high, particularly with respect to accidents on the Pass. The general public and locals will therefore not be able to fully utilise and benefit from an upgraded gravel road.</p> |
| 378. | | | <p>Disagrees that for Alternative 4 the top 8km of upgraded gravel surface will only be accessible to 4x4 vehicles.</p> | <p>As above, although the Pass may be accessible to 2x4 vehicles, the DOT intend to enforce 4x4 access only.</p> |
| 379. | | | <p>Questions whether Alternative 5 will bring in new tourism opportunities and if so, what they are. Noted that evidence around Lesotho points firmly to the contrary</p> | <p>Noted. It is anticipated /assumed that improved access would improve or provide for new tourism opportunities. This assumption will be tested through the SIA (including tourism). Evidence / discussions held to date with the Authorities and local in Lesotho suggest that the improved accessibility of Alternative 5 will create new opportunities for them.</p> |
| 380. | | | <p>Reviewed Section 5 of the DSR on Impacts on local communities and noted that should the Pass remain open with no upgrade or closure, the status quo continue.</p> | <p>The status quo will remain as is for a short period i.e. a few local benefit retain their benefits while the remainder still have restricted or no benefit from the Pass in its current state. As noted earlier, in the medium to long term, Alternative 1 becomes environmentally unsustainable and will result in closure of the Pass, in which case the whole community loses.</p> |
| 381. | | | <p>Stated that Alternative 2, is incorrect as it assumes that an upgrade will mean only 4x4s may use the road which is not the case.</p> <p>Stated that the current state of the Pass benefits the local community in a number of ways as follows:</p> <ul style="list-style-type: none"> • It is part of their heritage as South Africans and Basotho and has an inherent value • it has led to a dramatic rise in tourism, resulting in many | <p>As noted above, although Alternatives 1-4 may allow access by 2x4 vehicles, the DOT will enforce 4x4 vehicles only due to the significant risks and liabilities to the DOT in the case of an accident or death on the Pass.</p> <p>The current state of the Pass on benefits a limited number and specific sector of the local community on both sides of the Border. The remainder of the communities have limited access and limited use of the Pass due to the 4x4 status. They also</p> |

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| | | | sustainable tourism businesses in the KwaSani area, stable families living in the area, and the creation of many direct and many indirect jobs. | have restricted opportunities to use the Pass for their own initiatives. The impact of upgrading the Sani Pass will be assessed in the Heritage Study. |
| 382. | | | Highlighted that the economic study will present current data showing the tremendous growth especially as the data quoted so far are from many years ago. It was also suggested that a study should project the current and future growth rate, should it continue with these parameters for the next 10 years. | Noted. The Economic Study will attempt to consider and assess such data in its assessment. |
| 383. | | | Challenges that the cost of taxis on the pass is not significantly higher than on other routes. A taxi from Underberg to Pietermaritzburg costs around R65. A taxi from the Good Hope Store to Mokhotlong costs R70. | Noted. Fares will be reviewed in the SIA and Economics Study |
| 384. | | | Stated that there is an assumption in the DSR that Alternative 3 and 4 would restrict non 4x4 vehicles. As a result the referred section of the DSR is incorrect. It is believed that for Alternative 3, the road will be open for the maximum amount of time, as the dirt surface allows the road to stay open far longer in snow and ice. | As noted above, the referred section of the DSR remains correct and valid as the DOT have indicated that they will enforce 4x4 only status on the Pass (as it is currently) should it remain a gravel road of any kind. The road surfaces options are currently under investigation by the Engineers to ensure a suitable road surface which is safe and accessible under most weather conditions. |
| 385. | | | Questioned how substantially Alternative 5 would reduce travel times. | Alternative 5 may reduce travel times although not substantially. This comment has been corrected. Alternative 4 is not intended to reduce travel times significantly but it expected to reduce the travel distance between KwaZulu-Natal and Mokhotlong and also provide an alternative route for travellers from the western side of Lesotho. |
| 386. | | | Reviewed Section 3.6 of the DSR on Impacts on Road safety and advised that the safety issue for Alternative 1 would be the same as it currently is should Alternative 1 reflect the road would remain open. Questions how the state of road as reflected in alternatives 2, 3 and 4 would jeopardize safety, as the upgraded gravel surface would be of good quality. | Noted. Noted. However, over a short period road status would remain but begin to degrade over the medium term and continue to cause significant environmental damage to the WHP to the point where the DOT and EKZNW could possibly call for closure of the Pass. To this point of closure, the condition of the road would degrade, and with it, safety. Regardless of the quality of the upgrade, the DOT have stated that they will continue to enforce 4x4 only access to the Sani |

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| | | | | Pass should the Pass remain gravel. |
| 387. | | | Advises that an all weather surface as described in Alternative 4 and 5, will definitely result in an increase in driver's speeding and a blasé approach of the driver's attitude. This will result in a dramatic increase in accidents, which can be fatal in such terrain. | Noted. The project team is aware of the issues regarding speeding, safety and negligence should the Pass become an all weather road with improved access for 2x4 vehicles. The project team is investigating a number of methods to control speed, improve safety and reduce accidents on the Pass. |
| 388. | | | Stated that for Alternative 1, the impact on the link between KZN and Lesotho would remain the same should Alternative 1 be amended to include an option for the road to be open. | Noted. |
| 389. | | | Are of the opinion that an upgraded dirt surface would allow for easier transit between KZN and Lesotho as there would be opportunities for maximising growth, and trade and movement due to the road allowing all vehicle types. This opinion would be applicable for Alternatives 2, 3, 5 and upper section of Alternative 4. | As noted the DOT have indicated that they will enforce 4x4 only status on the Pass (as it is currently) should it remain a gravel road of any kind. As such, the opportunities described will not be available and hence the suitability of these options is significantly reduced. |
| 390. | | | <p>Disagreed with the con (negative of pro) noted on Pg 28 - 30 of the DSR, that states a permanent labour team would be required for alternatives 2, 3 and 4, as the Suchet's view this as a major pro as the permanent team could:</p> <ul style="list-style-type: none"> • Filling potholes before they form • Clearing drains/pipes before they become clogged thereby not resulting in rivulets flowing down the middle of the road. • Returning the maximum amount of gravel which was washed off the road • Ensuring that rocks, logs etc do not block drainage lines or pipes and other general road maintenance. • Create long term, sustainable jobs <p>Ensure that the gravel surface remains in good condition with the road open to normal traffic.</p> | <p>Noted, however discussions with the DT and Engineers indicated that having an unskilled permanent labour force would pose a safety risk and additional cost to the DOT which has its own permanent Road Maintenance Department.</p> <p>The potential positive and/or negative impacts that could arise due to the required labour force for each alternative will be assessed in the Impact Assessment Phase of the EIA.</p> |
| 391. | | | Expressed concern that the DOT does not consider using hand labour, while instead of maintaining the road with hand labour DOT rather waits until a machine is needed, or becomes available. In addition hand labour creates jobs for many rather than one machine operator. The Suchets would like to see this proposal getting serious consideration in the report. | <p>Noted. As above, the DOT and Engineers have indicated that having an unskilled permanent labour force would pose a safety risk and additional cost to the DOT which has its own permanent Road Maintenance Department.</p> <p>This issue will be further assessed in the Impact Phase of the EIA.</p> |

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| 392. | | | Disagrees with Table 6 of the DSR, which states that there will be no growth in tourism expected for Alternative 2. Tourism on the Sani Pass has continued to grow annually over that last 15 years, and has shown no sign of slowing down under current circumstances. | Noted. Table 6 has been corrected to reflect limited tourism growth potential. The impact on tourism will be assessed as part of the SIA. As above, the DOT will continue to enforce 4x4 vehicles only on the Pass even if upgraded. As a result, the Alternatives are described are relatively accurate and applicable. |
| 393. | | | Disagrees with the statement in Table 7 of the DSR which states that the impact causes at the top of the Pass are not dealt with. Should Alternative 3 include sorting out the drainage, then the impact causes will be been dealt with. Alternative 3 will result in the following: <ul style="list-style-type: none"> • Pass will be completely accessible to all tourists. • Pass closures will be minimum • There will be potential to maximize socio-economic linkages with Lesotho • Pass open to non 4x4 vehicles | Noted. A loose gravel surface will still erode and be washed away and create secondary and tertiary impacts (e.g. clogging of drains and impact on river). It is recognised that Alternative 3 meets a number of the required criteria but is fatally flawed in that it will still only be accessible by 4x4 (as per the numerous explanations above) and is potentially fatally flawed in that it is environmentally unsustainable in the long term and with no sources of infinite building materials. |
| 394. | | | Highlighted that Alternative 4 is inconsistent with the other alternatives in Table 7 of the DSR, and questioned why Alternative 4 would result in lengthy Pass closures? The Suchets further disagreed that Alternative 4 would result in no growth in tourism and stated that Alternative 4 will result in the Sani Pass being fully accessible to non 4x4 vehicles and will have growth and development. | Errors in Table 7 were found whereby impacts on Community and Road Safety had been swapped. These have been corrected. Alternative 4 will still be restricted to 4x4s only as discussed above and therefore not share the potential benefits of being fully accessible to all. |
| 395. | | | States that Alternative 5 will result in the experience of Sani being destroyed, therefore it will not be open to all. The Suchets' questions what other opportunities Alternative 5 will result in. | Noted. This issue is a direct tourism /social issue and will be addressed in the SIA and Assessment Phase. |
| 396. | | | Notes that the DSR makes no mention of the current tourism or the impact the proposed development will have on those tourism ventures in Eastern Lesotho, of which is an important factor and needs to be assessed. | Noted. This issue is a direct tourism /social issue and will be addressed in the SIA and Assessment Phase. |
| 397. | | | States the Alternative 5 will result in increased Pass closures, especially during icy and snow conditions in winter. | Noted. Alternative 5 states that there will be reduced pass closures and this would be primarily due to the storm water being managed more effectively. The side drains at the positions on the pass where ice is experienced will be increased in size and depth in order to minimise the risk of ice |

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| | | | | build up on the road. |
| 398. | | | Disagree that Alternative 5 will result in an increase in tourist traffic and stated that there will be a decrease, which is indicated in the WESSA survey. | The impact on Tourism, both positive and negative will be assessed in the Tourism Study as part of the SIA. |
| 399. | | | Questioned why Alternative 6 is being discussed as it is too unpractical. | Alternative 6 was included to show the complete range of options that the DOT and Engineers have considered. This should include extreme options on either end of the scale. Alternative is not a practical or feasible Alternative. |
| 400. | | | Highlighted that quad biking has been outlawed and the quad-biking operators have closed down their operations. | Noted. |
| 401. | | | Expressed concern that Section 4.6.1 (c) in the DSR on tourism enterprises in Lesotho does not include Molumong Lodge, the pony trekking operator based there, St. James Guesthouse and the community tourism enterprise at No 10 Riverside. | Noted. These tourism enterprises have been included in the SIA. |
| 402. | | | Hoped to view quantitative data on the how many families are split across the border and the movement of people from Mokhotlong to South Africa through the Sani Pass which is related to health care and education. | This information is still being gathered through the SIA and Economics Study. |
| 403. | | | Challenges 4.7 (d) in the DSR on seasonality as there is no real tourism season and while there are peaks and troughs, tourism on the Pass is a constant. | Noted and amended. |
| 404. | | | Expresses concern as the section 4.6.2 of the DSR is hopelessly out of date and thus totally misleading in its conclusions. Therefore the Suchet's expressed that they are looking forward to participating in the economic survey producing up to date data on population, employment and incomes. | Noted. It is important to note that the aim of the scoping report is to identify areas where further study is required. An economic impact assessment would be undertaken as such. |
| 405. | | | <p>Stated that the attendance at the Open Day/Public Meeting was poor, compared with the public meeting held to discuss Phase 1 some years back. This was due to:</p> <ul style="list-style-type: none"> • The meeting not being as widely publicized as was the public notification for the start of the EIA process which was excellent • The meeting was advertised relatively close to the date it took place on. • The first weekend in December was not a good time with | <p>Comments noted.</p> <p>Initial public notification aimed to inform as many IAPs as possible and encourage as many as possible to register (noting that IAPs can register at any point during the EIA process). All subsequent correspondence is thereafter limited to the registered IAPs. As such, Arcus GIBB informed approximately 500 IAPs of the meeting. Discussions with other consultants indicated that Saturday was the preferred meeting date although IAPs not indicate to the contrary. The next</p> |

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| | | | <p>many people busy or away.</p> <ul style="list-style-type: none"> • Saturday was not the most appropriate day <p>Advises that the next meeting be out of school holidays and on a weekday.</p> | <p>meeting will be on a weekday.</p> <p>In terms of the meeting date, the aim had been to release the DSR prior to Christmas to give IAPs extended review the while not holding back the EIA process.</p> |
| 406. | | | <p>Proposes that Alternative 3 is the best solution as:</p> <ul style="list-style-type: none"> • It will satisfy ecological requirements with the upgraded drainage and reduced erosion • It will satisfy tourism requirements as the 4x4 fundis and tour operators may prefer the road to remain open only to 4x4 vehicles, but an upgraded dirt surface allows the area to retain its sense of place and hence its tourism value while increasing accessibility. • It will satisfy trade requirements as an upgraded dirt surface will: <ul style="list-style-type: none"> - Increase accessibility to trade vehicles - Remain open for the maximum days in the year - Reducing maintenance costs from the current situation - Meet safety requirements as speeds will still be very low, drivers will still need to use intense concentration and the surface will be the best under snow and icy conditions. • In addition, if it is combined with a well structured ongoing maintenance plan, it should ensure the road in kept at a high standard while providing long term sustainable employment. Thus the benefits sought from Alternative 5 will be achieved at a fraction of the cost and a fraction of the impact on the road reserve and fringes. | <p>The motivation for Alternative 3 is noted. It is also acknowledged that Alternative 3 meets a number of the required criteria but will still only be accessible by 4x4 (as per the numerous explanations above) and is therefore potentially fatally flawed in that it is environmentally unsustainable in the long term and with no sources of infinite building materials. It will, however, be assessed in detail in the Impact Assessment Phase.</p> |
| 407. | Ms. Delia Gardner Hollybrook Farm | IAP052 (23/01/2009) | Expressed concern as the quarries needed to provide the materials of the road are ugly and dangerous. | Agreed – quarries are not attractive but are necessary for the supply of materials to build roads. Quarries are meant to be temporary facilities which are rehabilitated to a state acceptable to the DEAT and the Department of Minerals and Energy (DME). The quarries for Phase 1 have adequate materials for Phase 2 so no new quarries will be opened. |
| 408. | | | Stated that her concerns and fears with regards the detrimental environmental effects of quarries have are | Noted. Environmental Impacts are well documented and supposed to be managed by an EMP. It is also the |

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| | | | coming true. | responsibility of the contractor and the proponent to ensure impacts are minimised. |
| 409. | | | States that the long standing residents of the area will have their quality of life on their family farms destroyed by the quarry activities. | As noted, no new quarries will be opened. |
| 410. | | | <p>Noted that the latest is a quarry in front of Russell Watson's farm house on the Lotheni Road is in their line of vision from their veranda. In addition it is in front of their farmhouse which is run as a guest lodge. As a result the following will occur:</p> <ul style="list-style-type: none"> • Dust will have adverse health effects for their family guests and livestock • Their peace and tranquillity will be lost • The very beautiful valley will be desecrated for a long period of time, which will not be ever returned to its present state • As the road which runs from Himeville to Nottingham Road would rival Chapman's Peak Drive in terms of beauty if it was developed, however this quarry is clearly visible from the road. <p>The road from Himeville to Nottingham Road would link two extremely popular tourist areas and could create an international tourist attraction with beneficial effects to the community, however, the quarry is clearly visible from the road and this quarry would be an absolute blot on the landscape and causing a traffic hazard with construction vehicles.</p> | <p>Phase 2 has had no involvement in the application to mine these quarries which was undertaken as part of the Phase 1 project. As such, Phase 2 has no recourse on where or how these quarries were identified or have been utilised to date.</p> <p>The impacts/issues and mitigatin measures will, however, be included in the EMP for Phase 2 as Phase 2 will source materials from these same quarries.</p> <p>The issues raised on the comments will be forwarded to the EIA consultant for Phase 1 for consideration.</p> |
| 411. | | | There is concern of the safety of the road as there has been a death on the Pevensey Road due to the dangerous driving of the lorry drivers. As a result the locals fear for their lives and avoid using this road if possible. | Noted. The Environmental Management Plan (EMP) will include environmental specifications to mitigate impacts during construction of the road and will include specifications for safety on and off site. This EMP will be submitted to the DEAT for approval, along with the Environmental Impact Assessment Report. |

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| 412. | Ms. Geraldine McFarlane ARBUCKLE HOUSE Bed and Breakfast and Self-Catering | IAP053 (23/01/2009) | Disagrees with the upgrading of the road at the top of Pass as are all the other Bed and Breakfast establishments in the area. Noted that she receives a lot of overseas guests who are horrified when they hear that the road is to be hard surfaced. Her guests believe that the magic of an 'African' experience will be lost should the road be hard-surfaced and that Sani Pass will become just 'another' Pass that any vehicle can negotiate. | Disagreement is noted but no motivation or supporting documentation is provided. Arcus GIBB is aware of the issue of loss of the 'African experience' and will it is considered in the assessment. |
| 413. | | | Suggests, it would be far more beneficial if the money was spent on tarring the road between Himeville and Nottingham Road, which would bring more tourism to their village. | Noted, however, tarring other roads will not resolve Sani Pass's environmental problems and make the Pass accessible to potential users. |
| 414. | Mr Ray Watt Thaba Tours & 4x4 Adventures | IAP054 (26/01/2009) | Noted that he has already commented on this road, and does not want it upgraded. Stated that Arcus GIBB should have this in writing from 50 different other people, as should be documented in GIBB's records. | It is assumed that Mr. Watt is referring to Phase 1 as there has been no record of comment from Mr. Watt to date. No motivation or substantiation of his opinion is provided. Arcus GIBB has found comments in Phase 1 Scoping Report: Issues and Comments Reports from both Mr R. Botha and Ms. D. Shulze of Thaba Tours which will be reviewed in light of Mr. Watt's comment. |
| 415. | Mr J J Viljoen Viljoen Incorporated | IAP055 (09/02/2009) | Agrees that the actual experience associated with the Sani Pass is the fact that it is not a tarred road, which is an exceptional experience for those having access to 4x4 vehicles. It was further stated that tarring will not only change the entire nature of the experience but also the scenery and the feeling of remoteness that one currently experiences when travelling up the Pass. | Noted. This issue has been raised and will be assessed in the Impact Assessment Phase. |
| 416. | | | Offered unconditional support to do as much as is humanly possible to convince the authorities that the tarring of Sani Pass would destroy the Sani Pass experience, destroy nature and wipe out history. | Noted however, it is important to point out that the project involves more than just 'tarring the Pass' and is not intended to 'destroy nature' but protect it, nor will it 'wipe out history'. |
| Comments submitted post submission of the Final Scoping Report | | | | |
| 417. | Jonathan Aldous | IAP056 Email (04/09/2009) | Hi, I am the owner of Sani Top Chalet and so have a vested interest in the proposed developments. I have been to meetings and filled in questionnaires from time to time as requested but have never been actively involved in the for/against issue as it shouldn't really need to be debated . | Comment noted. |

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| | | | <p>Yesterday there were some gentlemen from the road design team at Sani Top who told me that there could be some doubts as to the continuation of this project due to the tour operators continued opposition to the upgrade.</p> <p>No one wants to see hard working SA entrepreneurs out of business because of progress but we cannot continue to drive this road as it is. It might be a 4x4 experience but this is becoming a joke and with the summer ahead, there will be no road by April. To spend money, repair it to an acceptable level, and not secure it will be throwing good money after bad, as it will all be gone in 3 years, it has all been done before.</p> <p>What will become of all of us should not be the issue; what's best for the environment and assisting in the development of Lesotho for future generations is the debate here. Don't let greedy tour operators and old sentimentalists cloud your decisions we will all survive whatever happens there are plenty of opportunities out there. FIX THE ROAD!</p> | |
| 418. | Mark Dodson | IAP057 Email (21/04/2009) | <p>I am subscriber to "African Wildlife " and have been since I returned to the UK in 1985. I have a few photographs of the " long and winding road " no reference to the Beatles song implied there, and some of my best visits were to the Drakensberg and the Sani Pass / Lesotho area and God help us if it is tarred. Next will be cafe's and Picnic sites everywhere , with litter left all over the place.</p> <p>Having read the article about the proposed tarring of the pass, THIS IS SOMETHING THAT MUST NOT HAPPEN!!!!!!!!!!!! Leave Nature alone. I fully agree with WESSA'S stance that a sensitively managed upgrade of the dirt track would be the way forward, but a fully tarred surface is a NO NO. The Wildlife and Fauna will just disappear.</p> <p>I hope through the magazine we will be kept up dated with this and that no one completely loses the plot and goes ahead with this hare-brained scheme.</p> | Comment noted. |
| 419. | Russell & Simone Suchet Sani Lodge Backpackers and Drakensberg | IAP058 Email (05/05/2009) | 1) What has happened to the final scoping report? | 1) The Final Scoping Report is in the last stages of being corrected / amended to include comments and suggestions received during its draft review. The major time component of the final reports compilation has been the collection, recording |

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| | Adventures | | | and responding to the comments received. We have about 40pages of issues, comments and responses which need to be verified and checked and as I'm sure you can appreciate, this takes time. I hope, once the report has been through its required internal reviews, to submit it to the Department of Environmental Affairs and Tourism (DEAT) within the next 2 weeks. You will be informed of its submission and availability for review by all and any interested and affected parties (IAPs). We will immediately send you an electronic copy |
| 420. | | | 2) How can the Environmental Impact phase go ahead before the Final scoping report has been approved by the department? | It was agreed with the DEAT during the early stages of the Scoping Phase that the Impact Phase and primarily the specialist studies, be allowed to be initiated as the Primary Issues and Concerns and the resulting need for specialist studies (e.g. social and economic) were very apparent. The DEAT have been involved in/and aware of all stages of the Scoping Phase (including review of the Draft Scoping report) and it is expected that the assessing officers would have raised concerns if they had had problems with the process to date. There is a risk that the DEAT, on review of the Final Scoping Report, may request additional studies and or /modifications to the Impact Phase. In an effort to not extend/draw out this process indefinitely and with confidence that the primary issues requiring specialist investigation have been identified, this risk is acceptable. |
| 421. | | | 3) Going ahead with the specialist studies based on the draft scoping report compromises this work as some of the assumptions in the draft scoping report are flawed. This surely could put the whole process at risk | Although some of the assumptions of the Draft Scoping Report have been identified as being incorrect or inaccurate (and have since been reviewed and corrected/amended), the whole process is not at risk as the primary issues related to the project have been identified and well discussed between all the parties concerned. The specialists have also been made aware of the issues raised through the entire process and the review of the Draft Scoping Report and have met and workshopped revised approaches and scopes of works where necessary. There is a potential risk that components of the specialist studies may need to be revised, modified or re-investigated should the DEAT review raise further queries or issues which it feels have not be adequately addressed. |

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| 422. | | | 4) Why are the specialist studies on such tight time scales? It seems unrealistic to expect comprehensive and accurate reports to be produced in such short time scales. | The entire project is on a tight deadline as efforts are being made to cap time, energy and funding on the project which is already well behind schedule. All parties are aware of, and are frustrated by, the delays which have hindered all the projects in the area. As such, milestones or targets have been set to assist with ensuring the project is completed timeously. The specialist studies are also subject to timeframes which the specialists have considered agreed to and are trying to stick to. If the specialists felt the timeframes would jeopardize the validity of their studies, or reduce their confidence in their results, then they would inform us so that the tasks and timeframes could be reviewed and revised in joint agreement with the client and the DEAT. |
| 423. | | | 5) We have heard nothing whatsoever of the economic survey. I have had report of one contact being made only in the district. Either this study will not be very wide ranging or accurate, or they have a MASSIVE amount of work to do in a very short space of time!! | I spoke to the economic specialist this morning and was informed that they have in fact been communicating 1-on-1 with various stakeholders in the area (as is their preferred methodology) and have already completed their survey in Lesotho. Mr. Kobus van den Berg has assisted with identifying key IAPs which ADEC will include in their list. ADEC noted that they still needed to talk to you before they complete their survey/study. ADEC have also noted their concerns, which we are discussing with the project team, with regards to the study timeframes and have been told to ensure that timeframes to not jeopardize the validity of the study. All Specialists have been instructed to ensure that they complete the necessary tasks in a manner that would render their studies accurate and scientifically sound. |