

## Govender, Sanusha

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**From:** Philip Grant [pgrant@yebo.co.za]  
**Sent:** 12 January 2009 06:57 AM  
**To:** Govender, Sanusha  
**Subject:** Re: IAP NOTICE: Environmental Impact Assessment for The Proposed Upgrading of the Sani Pass Road (P318) - Phase 2

Dear Sanusha,

Here follows our comments on the Draft Scoping Report for the Upgrade of the Sani Pass Road (P318):

- The Draft Scoping Report appears to be heavily biased in favour of option 5, (*improve geometrics, upgrade drainage, construct bridges and retaining walls, hard surface from km 14 to km 33*).
- Anyone reading the DSR who has little understanding of the issues surrounding the proposed upgrade, or has not personally visited the area or travelled along the road in question, would therefore probably opt for option 5. We venture to suggest that the SA Roads Department officials who will ultimately 'rubber stamp' this project probably fall within this category.
- We are personally disappointed that the DSR is so biased, as we understand that an EIA should be an impartial assessment.
- Some of the important conclusions drawn in the DSR are based on erroneous assumptions, for example the DSR refers to 'frequent closures of Sani Pass due to soil erosion'. This is a misrepresentation, as to the best of our knowledge, and with very few exceptions, within the last 10 years or so, Sani Pass has only been closed due to *adverse weather conditions* such as heavy falls of snow and the formation of ice. In early 2008 Sani Pass was closed for a few hours as a result of a flash flood at Twin Streams.
- Even if option 5 is approved, the P318 over Sani Pass and Black Mountain Pass in Lesotho (Kotisophola) will never be an 'all weather road' as heavy snow and / or ice will force its closure from time to time. (At least 2 or 3 times in a winter).
- Another erroneous assumption is that the route from Maseru to Durban via Sani Pass (P318) can be a viable alternative to driving around Lesotho on the existing SA road network. It is stated in several places, that the P318 will 'shorten the distance by 150kms'. Firstly, upgrading Sani Pass will not shorten the distance in any way, and secondly, anyone who has travelled through Lesotho by road will know that it is impossible to achieve an average speed of more than 30 - 40kms per hour even on hard surface roads due the extremely tight corners, and the presence on the roads of herders and domestic animals. The P318 may be shorter in distance, but will never be shorter in time.
- We would like more idea of the envisaged 'tourism development' that will occur in the Eastern Highlands of Lesotho as a result of an upgrade of Sani Pass. Will this be the sort of 'tourism development' that will benefit the wider village communities in Lesotho, or will it benefit a few already wealthy business people, and in the process visually and environmentally destroy the Sani Top area?
- It is implied in the DSR (page 68) that an upgrade of Sani Pass will improve access to and benefit the Qachas Nek and Sehlabathebe areas in addition to the Mokhotlong District. This displays a basic ignorance of Lesotho geography as the P318 takes the traveller nowhere near these areas.
- If option 5 is approved, we submit that the use of 'shotcrete' and 'soil nails' to stabilise the embankments and cuttings, the bridge structures, and the concrete foundations

needed to support such a road will visually destroy the Sani Pass valley.

- The fact that many herders with domestic animals as well as recreational pedestrians will still need to use an upgraded Sani Pass, seems to have been left out of the equation.
- All of the Sani Pass upgrade options as envisaged in the DSR will stop at the Lesotho border. It is imperative to take into account what will happen to the continuation of the road into Lesotho and over Kotisophola (or Black Mountain Pass 3240m) and on to Mokhotlong. It is pointless to improve the P318 up Sani Pass without a similar improvement to the rest of the road. The project is a cross border and international project, and the type of upgrade finally decided upon for Sani Pass must of necessity be continued to Mokhotlong. This point seems to have been missed in the DSR. The road over Kotisophola in Lesotho faces all the problematic weather conditions experienced on Sani Pass with even heavier falls of snow and accumulation of ice in winter. It would be pointless to drive to the Lesotho border on a road such as envisioned in option 5, only to be stopped by an 'inferior' upgrade of the P318 in Lesotho.

**We submit that any upgrade of Sani Pass (P318) should involve the minimum construction to enable the road to be negotiable by non 4x4 vehicles in all but the most adverse weather conditions. These improvements would then meet all the detailed requirements for the road with the least visual impact. A permanent maintenance team could then be employed. This would be a 'pro' factor as it would create much needed employment in the area.**

**We are therefore in favour of option 3 (*improve geometrics, upgrade drainage, retain splash throughs, construct retaining walls and re-gravel*).**

- There is no reason why such an upgrade (option 3) will have to be restricted to 4x4 vehicles. When the last minor improvements and re-surfacing were done around the year 2000, the road was negotiable by non 4x4 vehicles and saloon cars (even towing caravans!) for about 2 years until the road surface deteriorated due to lack of ongoing maintenance and inadequate drainage.
- Gravel for the road surface should be sourced within 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.

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18<sup>th</sup> January 09

Mr Russell Stow,  
Arcus Gibb,  
P O Box 1365,  
WESTVILLE,  
3600.

Dear Mr Stow,

RE: Sani Pass Phase 11

Further to your meeting at Underberg in December I would like to record my concerns and objections as follows :

1 The hard surfacing of the top reaches of the Sani Pass will destroy the character of the pass completely. This aspect is very important from the tourist point of view because the German Tourist operators have already said that they will not return if the pass is hard surfaced with whatever medium. This is because they have more spectacular passes in Europe but they are all tarred and the Germans come to Africa to see what the old roads were like. It is an adventure for them whereas a tarred or hard surfaced road is too common place. The Sani Pass is something unique, we do not need to destroy one of the countries major tourist assets. The proposed improvements to this road will at best benefit a mere handful of people whereas the money could be far better spent on improving access to the Southern Drakensberg by improving the Loteni road and thus benefiting thousands of people both tourists and residents. By all means surface the road up to the present Border Post but then please leave the top section alone !

2 A hard surfaced road will create a serious hazard in winter on account of ice. They have even steeper roads in England but they are closed for three months every year on account of ice. Are we to accept the pass being closed every year on account of ice and an inability to keep the road clear of it ? As it is ice is a big problem for two months every year but with the rough surface traffic is able to get through.

3 A smooth surface and a wider surface will encourage speeding, already a problem in many instances and will lead to serious accidents. The road does not need to be widened much except perhaps on some corners. Already motorists are exceeding the speeds that are proposed for sections of the Sani Pass after it is 'improved' !

4 A hard surface is more likely to be damaged by weather, ice and storms and a bad hard surface is infinitely worse than a gravel surface that has been eroded.

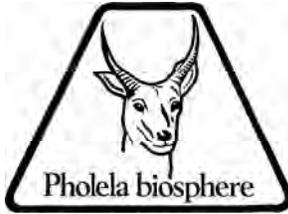
5 Looking at the plans it appears that there will be a number of excessively large, high and unsightly cuts into the mountainside, some in excess of 30 meters. These unsightly cuts will be visible from far beyond the berg. The ground is already unstable and such cuts will only make it more so resulting in rock falls and subsidence's. These could be avoided by using a narrower pathway and building the road up over the slope rather than cutting into the mountain.

6 Maintenance will be a problem even if it is put out to contract. It is unlikely that drains will be kept in proper order etc: specially when weather conditions are poor and working there is unpleasant. For this reason drains should be put diagonally across the road surface and not in pipes which are easily blocked. This system worked efficiently for many years until the experts took over. It is never seriously considered that the most efficient form of maintenance is by using hand labour rather than machinery, something proved by the Basutho over a period of at least forty years.

7 From discussions I have had with various engineers it appears they have taken no heed of the historical problems and solutions that have been used in the past. 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.

Yours sincerely

M Clark.



22<sup>nd</sup> January, 2009

## UPGRADING OF SANI PASS

The Pholela Biosphere wishes to express the following concerns regarding the proposed Sani Pass Upgrade:-

1. Although the road is an open corridor within the Ukahlamba Drakensberg Park World Heritage Site (UDPWHS), and therefore not officially part of the UDPWHS it should not detract from its environs. Any major earthworks that need to be done to widen or straighten the existing route will be an eyesore. 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. This widening and straightening will impact on the adventure experience which people are looking for when visiting the area.
2. Upgrading the road will not lessen the danger aspect. A better surface will encourage speeding and possible reckless driving. It will increase the vehicular traffic numbers and attract those, who up till now view the road with extreme caution, to use it without experience of driving on steep inclines or inclement weather conditions. Many drivers will use vehicles not ideally suited for this type of mountain pass.
3. The maintenance of the upgraded road will need to be constantly monitored. There is a perception that once there is a hard, non-gravel, surface no maintenance is required because the hard top is maintenance free. In fact the maintenance will have to be as regular and more important. Users can traverse a bad gravel road more easily than a hard-topped road that has been severely damaged by water, ice, frost or snow.
4. At present the gravel provides traction in muddy and icy conditions so it is a better surface for twelve months of the year. Ice on a hard topped road will be very dangerous and impassable.
5. At present there are still doubts about the relocation of the new border post as the 'preferred' site is in a wetland which is liable to experience severe flooding. A bigger border post will also attract more users of the Sani Pass and until the Need and Desirability of such a border post structure have been properly investigated the subject of the road should be put on hold.

6. The view that this road is essential to open up the region is flawed. A better option would be the upgrading of the road through Loteni to Himeville from the end of the present tar road 30 kms south from Nottingham Road. This latter option will open up a vast rural area to schools, clinics etc. The Sani Pass road will only benefit a few people, if any.
7. Some of the members of the Pholela Biosphere rely on the Sani Pass in its present condition for their livelihoods as guides, accommodation providers and tourist drivers and any restriction on these activities during the construction of the upgrade will impact unfairly and heavily on their livelihoods as well as the fact that 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. This will impact on the local economy.

We trust that careful consideration will be given to all the concerns listed above.

Rosanne Clark  
Chairman

**Govender,Sanusha**

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Hello,

We wish to reiterate the contents of our email dated June 25, 2008, and referenced in the Draft Scoping Report dated December 2008. In addition, and in response to an overwhelming number of the comments contained in the aforementioned Scoping Report , that the incorporation of our soil stabilizer will achieve the following:

1. The retaining of the natural aesthetics of the scenic Sani Pass
2. A safe road surface
3. Reduced maintenance requirement
4. Reduced cost ( much less than cement or asphalt )
5. A reduced environmental footprint, this is especially important in consideration of the location

We attach two reports which set forth results of extensive tests conducted by Africon and Geostrada on a mine haul road and crusher tip which was constructed using our soil stabilizer, this road has traffic volumes of 300 tonne trucks every 30 seconds, and was constructed over a year ago. We have a number of additional test reports, laboratory reports and site references which prove the performance level of our product and the viability of this being the right solution for the upgrade of the Sani Pass. Tranacon, which is mentioned in one of the attached reports is a approved contractor of our product and has the proper equipment to do an upgrade to the Sani Pass or to work together with appointed contractors.

We look forward to a final decision and way forward for this project and remain an interested party.

Thank you

Sharon Schoutens  
Soil & Dust Solutions Pty Limited

**Govender,Sanusha**

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**From:** Sani Lodge [info@sanilodge.co.za]  
**Sent:** 23 January 2009 09:49 AM  
**To:** Govender,Sanusha  
**Subject:** WESSA letter to accompany response to draft scoping report  
**Attachments:** header.htm

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**WILDLIFE AND  
ENVIRONMENT  
SOCIETY OF SA**  
*People caring for the Earth*

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16 January 2009

Proposed Upgrade of Sani Pass Road (P318) - Phase 2

Draft Scoping Report (dated December 2008)

The attached comments are submitted by the Sani Branch of WESSA and are fully supported by WESSA KZN Region.

C Schwegman(Mrs)  
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## **SANI PASS DRAFT SCOPING REPORT RESPONSE on behalf of the WILDLIFE AND ENVIRONMENT SOCIETY OF SOUTH AFRICA (WESSA)**

Having read the Draft Scoping Report and attended the Open Day/Public Meeting, we would like to congratulate the EIA Consultants on the job done so far. The report has endeavoured to cover all the many issues raised about the project and has acknowledged the many shortcomings and unanswered questions. We also feel that the 6 alternatives proposed for the road is a very good way forward in the quest to find the best solution to the problem.

The current global economic climate needs to be taken account of. Recent upheavals in the global situation will need to be factored in to the project and an updated cost analysis presented. There is little point in pursuing an option that cannot be carried through and it may be wise to reconsider at this early stage and downgrade the project to a level which is economically sustainable.

### **Comment on the Scoping Report:**

In our opinion, the report makes many incorrect assumptions, and comes up with a number of erroneous conclusions, and that some of these are crucial in weighing up the various alternatives. Our response will therefore concentrate on pointing out these inaccuracies.

SECTION 1.4.2 NEMA: Your report states that chapter 5 of NEMA is aimed to provide development which is socially, environmentally and economically sustainable. We feel that this is a crucial issue, and that the specialist social and economic studies which will be conducted as part of the Impact Assessment MUST look at the sustainability of the 6 alternatives put forward, and that they must look not only at the micro-environment, but at the macro-environment. By this, we mean not only the KwaSani Municipal area, but rather the effects on international linkages. Studies should look at the quantitative impacts on the Mokhotlong area of 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.

This section of the report further states that a cautious and risk-averse approach is adopted. This would suggest that from a tourism perspective, 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”.

SECTION 1.4.5 HERITAGE: We would like to state 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 totally alter it. We therefore urge those preparing the specialist report on heritage to take the road as a whole as its starting point, rather than looking for individual heritage sites along the way.

SECTION 1.4.6 (a) SADC: Here for the first time since the project was proposed, the real motivation for the proposal is laid bare. This project is part of a regional transport/communications plan. The aims of the plan are laudable, and we fully support them. However, this project is a classic case of someone in an office drawing lines on a map and making a decision without having any idea of the situation on the ground. The laudable objectives which SADC is trying to achieve would be far better served by keeping the Sani Pass as a gravel surface in conjunction with keeping all the roads in the Eastern Lesotho highlands as gravel surfaces. This is part of the appeal of eastern Lesotho to tourists – 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” who will be attracted. 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. While this may fly in the face of conventional logic which seems to be that tarring roads is always good for everyone, we believe that SADC and Lesotho needs to make detailed studies of the tourism situation and the future potential in eastern Lesotho before such ill conceived and far reaching projects are proposed. Since this is the very heart of the matter, we would like to propose that as part of the Impact Assessment process, that the top decision makers from SADC as well as from both the South African and Lesotho governments visit our area on a fact finding mission and that we are able to make our submission to such a delegation.

(b) MDTP: we find it hard to understand how the MDTP can contend that tarring the Sani Pass will lead to sustainable livelihood opportunities for people in eastern Lesotho, just as a statement and without a shred of supporting evidence. We contend that the result will be quite the opposite!

(d) World Heritage Site IMP: We note that it is stated that “roads that are heavily used should be all-weather” and would suggest that the Sani Pass is not and never has been heavily used, and neither is it ever likely to be. The need to upgrade to an all weather surface is thus not required under the WHSIMP.

(e) The IDP's: Both of course look to provide growth and employment to people in their areas. We contend that tarring the Sani Pass will provide a short-term creation of employment in the actual road construction, but that it will result in harm to the tourism industry and thus it will lead to a long term decline in the very factors it is aimed to improve. As was the case in the St. Lucia debate, we contend that eco-tourism provides the best potential for future economic growth in both the KwaSani municipal area and the Mokhotlong district and that therefore all efforts should be made to assist such future growth potential. This clearly means leaving the road between Good Hope and Mokhotlong as a dirt surface.

**SECTION 2.2.1 DEPARTMENT OF TRANSPORT MOTIVATION:** Once again it becomes clear here that the Department is merely trying to implement orders from above – ie that a political decision was taken to do the upgrade prior to any consultation with local communities on either side of the border. The economic benefits listed are laughable:

1) Access to the UDP from Lesotho – who do the Department expect will be accessing the UDP from Lesotho? Is there any clear evidence of a great body of frustrated travelers trying to access the UDP from Lesotho?

2) The distance from the eastern Free State and Maseru to Durban will be reduced by 150km. This may be true, but what commercial traffic will use such a route, given that it will include 8 steep and winding mountain passes of between 2225m and 3240m. Negotiating this route will thus take longer than the existing flatter route via the Free State and the N3 and vehicles using the new route will most likely use more fuel. We suggest that actual tests are carried out to give quantitative data and times and fuel consumptions on the existing and proposed routes. Surveys need to be carried out determining the potential volume of such traffic, or even of existing traffic travelling between Maseru and Durban.

3) The eastern Lesotho highlands will be opened up for tourism development. We contend that exactly the opposite will occur. Fine tarred roads exist in Lesotho into the highlands, from Butha Buthe via Oxbow to Mokhotlong and from Hlotse to Katse Dam, and in neither case has any meaningful tourism development taken place. Merely tarring a road does not magically produce tourists. Rather, it would be far more prudent to carefully study what tourism initiatives are succeeding in Lesotho currently, and to build on these successes. 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.

4) Business links between Mokhotlong and Underberg and Pietermaritzburg. Again, this is merely taken as a given. We believe an in depth study is required. It has been suggested that the biggest obstacle to trade down the Sani Pass is not the road, but rather the customs requirements at the border. This needs further investigation. In addition, while tarring the road may lead to increased trade down the Sani Pass, this may be at the cost of trade between Mokhotlong and Butha Buthe or the towns in the eastern Free State, ie the pie will not be enlarged at all, it will merely alter who is getting a slice. In addition, an upgraded gravel road will achieve the same ends at a fraction of the cost and disruption.

5) Will accessibility be increased? We believe a gravel surface on the top section of Sani Pass is the best surface in terms of ensuring the road is open for the maximum number of days possible per year. The only time the existing road has been closed has been due to one massive thunderstorm incident in 2001 (we believe even a well-constructed tarred road would have been affected in such circumstances), 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.

6) A new scenic tourism route opened up. This can be achieved without an all weather surface – a good quality and well –maintained gravel surface will achieve the same results at a fraction of the cost or disruption. Namibia’s extensive network of gravel roads illustrates how such a network can be the basis of a highly successful tourism product.

Under the next section – reasons for the proposed upgrade:

1) We agree that drainage at the top of the pass is of great concern, and support any attempts to improve this. However, to suggest that there have been frequent closures of the road due to the gravel surface is totally incorrect. Again, no evidence has been advanced to support this sweeping statement.

2) We understand the concern about loss of gravel. However, in the first place, a much improved drainage situation, if achieved, would greatly reduce the amount of gravel which moves off the road surface itself. In the second place, a dedicated full-time maintenance team (a proposal we shall flesh out further on) will ensure that gravel is put back on the road from drains, pipes etc on a regular basis, again reducing the amount of gravel actually lost. And thirdly, to contend that suitable gravel is hard to find is rather blinkered. 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, we are convinced that one of the reasons that gravel roads in Lesotho are usually in such good condition, and that they are drivable even in very wet conditions, is that they are built of basaltic soils. Since the very purpose of the project is touted as a cross-border initiative, we feel that there should be no problem with Lesotho providing road building material for an upgrade of the gravel surface of the road.

3) Erosion causes siltation in the Mkomazana river. This is of course true, but we hope that the specialist study will be able to quantify just how much runoff occurs due to the road itself. We suggest that a comparative study be set up between streams elsewhere in the range (for example, the Pholela river in its upper reaches below Masubasuba Pass, the next valley south of the Mkomazana) where no road exists in order to compare how much “natural” erosion takes place and how much erosion is due specifically to the road in its current state. We contend that if drainage is improved, then even with a dirt surface, the amount of silt reaching the river will be much reduced. How much of the silt reaching the river, under improved drainage conditions will be from the road surface itself, and how much from the surrounds?

Paragraph 3 again talks about frequent closures of the road impacting negatively on people in the Mokhotlong area. There have NOT been frequent closures due to the road surface, this is factually incorrect and creates totally the wrong impression.

Paragraph 3 also raises the issue of dust. Again, this is at best highly exaggerated. Travel speeds on the pass are by necessity extremely low, and as a consequence the dust problem is far far less than, for example on the phase 1 section. Once again, a sweeping statement has been made with no evidence to back it up.

#### SECTION 2.3 ROAD DESIGN:

##### Criteria (Department of Transport Terms of Reference)

We feel that this aspect of the design – to provide a two way road enabling speeds of up to 50 km to the 25 km point and 30 km thereafter – must be flexible and 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 in evaluating the project and it bears out the contention that the project is being promoted largely on political considerations.

In our opinion, the sensitivity of the Sani Pass in terms of its biodiversity should determine the criteria/ToR for the road and the following is unclear –

##### “2.3.2 Vertical Alignment.

During the design process, areas may be identified where the required design speeds and widths cannot be achieved without major environmental impact. In each case, this will be discussed with the client and, if agreed, changes will be made to the design in order to accommodate the existing terrain and minimise the environmental impact”.

We feel that design speed must be compromised where necessary to ensure minimal environmental impact.

At present, the road design has been done as though what is later stated as Alternative 5 is approved. We suggest that as part of the process, a design is made as though Alternative 3 is approved. This would be the ideal alternative as far as we are concerned.

SECTION 2.3.3 Shotcrete is touted as the perfect cure for all ills! We contend that despite the best will in the world, one cannot turn concrete, however tinted or moulded, into nature! Chapmans Peak is a fine example of the use of shotcrete, and what an ugly result. (Not only that, but Chapmans Peaks is currently closed due the unstable slope, despite the millions spent on the project. Shotcrete is NOT the cure for all ills!) Other concrete stabilisation measures, for example near the top of Mafika Lisu Pass on the road to Katse, are equally ugly. The top of Sani Pass will ultimately look like a great dam wall once all the required stabilisation is complete.

The arrestor bed system seems like a good way to slow down the water velocity and retain gravel near the road, and here for the first time, ongoing maintenance is mentioned by hand-labourers! Great!

SECTION 2.3.4 MATERIAL SOURCES: We again urge the team to look at sources of basaltic soil within Lesotho, and to talk to the Lesotho Transport Department who are able to build and maintain good quality dirt roads in difficult mountainous conditions.

The contention that Phase 1 borrow pits will provide sufficient materials for phase 2 seem pretty far fetched to us on the ground! Phase 1 has ground to a halt due to lack of suitable materials, and the source of material for phase 2 needs to be a full part of this EIA process as otherwise all other plans could founder as is currently happening with phase 1.

At the public session held on 6 December 2008 the inconvenience experienced by the local community resulting from the apparent delays with Phase 1 were discussed at length with the suggested reason for the protracted construction being the problems associated with obtaining road construction materials.

Verification on the source of suitable and adequate material, from an approved site must be provided. It appears that sources other than those identified for Phase 1 have not been considered and it may be necessary to do so. Scoping Report 2.3.1 DoT Terms of Reference requires the use of Borrow Pit authorised for Phase 1 for road construction materials. We would like confirmation that the borrow pit is authorised and its use is feasible for Phase 2.

2.3.5 STRUCTURES: We would like to see further consultation between ourselves and the design team with regard to individual places along the route, rather as happened in the early stages of design. We appreciate the commitment to finding solutions which take account of many of the unique properties of the route. We hope 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!

2.3.6 DRAINAGE: We urge the engineers and the department to look at water flowing over the road with open minds, and to discuss ideas further 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. There are number of locations where water flowing over the road would not only be the best solution from an aesthetic point of view, but also from a practical point of view. Flooding has hardly ever caused the road to be closed, and where damage has been caused, it was because the approaches to the crossing were not up to standard.

2.3.7 PAVEMENT: We urge the design engineers to pay more attention to using a gravel surface, and to look into the ideas put forward in a submission to the process in terms of a substance which can be added to the gravel to reduce dust and destruction of the gravel surface. Whilst the efficacy of such substances may be doubtful, research should be done as part of this process.

2.3.8 CONSTRUCTION: We are encouraged at the recognition of the many complex issues surrounding the actual construction phase. However, we wonder what will happen if the SA Border post does not move before construction is due to begin? Will everyone be accommodated at the existing Phase 1 site? And has approval to continue to use this site been given by the landowners (Sani Pass Hotel?) We are also unhappy at the large amount of traffic which will be using the whole length of the road as the construction process takes place. This has a negative impact on the tourism value of the area.

### SECTION 3 ALTERNATIVES:

We believe that this is a very useful way of taking the process forward and comment as follows –

The preferred option is given as Alternative 5 and we feel that all aspects of this option will need to be reconsidered in light of our first point above the global economic climate.

A number of incorrect assumptions have been made.

#### SECTION 3.1 DESCRIPTION OF ALTERNATIVES:

- The future of the road under alternative 1 is stated as closure of the road. We feel that this is one possible scenario, but that the road has continued along without any meaningful maintenance for the last 10 years (since the last major upgrade of the dirt surface) without having to be decommissioned. Therefore, your assumption that the road will have to be closed is rather extreme. We would rather see the road continuing as a poor condition, unmaintained road be used in assessing alternative 1, or else to split alternative 1 into an (a) closure and (b) road remains open. Should the road be closed, rehabilitation must be funded by the Department of Transport and signed off by KZMW when completed.

### SECTION 3.2 IMPACTS ON DEPT TRANSPORT;

An estimate of the costs of construction and ongoing maintenance costs would be useful be each of the alternatives. This would assist in assessing the relative merits of each alternative vs their costs.

Alternative 1: impacts will be different if our suggestion above is accepted. Therefore, no upgrade with the road remaining open should still entail some maintenance costs.

### SECTION 3.3 IMPACTS ON ENVIRONMENT

Alternatives 2 and 3 – we disagree that sourcing road material is a long term problem – the solution lies on the Lesotho side of the border, something which does not seem to have been considered at any stage. Given the purposes given for the project and its cross border nature, sourcing good material from within Lesotho seems a viable and long term option, 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.

### SECTION 3.4 IMPACTS ON TOURISM:

Alternative 1, if split as we suggest, will not necessarily mean a closing of the road to tourists. It will in fact retain one element some tourists have stated as very important, namely the 4x4 nature of the route. This is in fact the best option for such “adventure” tourism.

Alternative 2: The report assumes that an upgraded gravel surface will result in the road only being open to 4x4 vehicles. This has been clearly demonstrated NOT to be the case. The upgraded gravel surface produced by the Basotho team in around 1998 resulted in all sorts of small sedan vehicles (eg Fiat Uno, Daihatsu Cuore) driving up and down the pass for around 2 years before lack of maintenance caused the surface to deteriorate. (We strongly suggest that an in depth study into that upgrade be carried out in order to learn lessons from what took place in terms of the road construction, conditions and the impact the improved access had on tourism.) Lack of improvement to drainage will threaten this 2x4 status in the longer term, but will certainly result in sedan vehicles being able to use the road in the shorter to medium term, especially if there is ongoing maintenance.

Alternative 3: Once again, the erroneous conclusion is made that an upgraded gravel surface will result in the road being restricted to 4x4 vehicles. See above. This is a crucial assumption, as if one assumes that the road under alternative 3 is usable by normal vehicles, then alternative 3 fulfils a much larger number of the projects aims. The general public and locals now WILL be able to fully utilize and benefit from the road.

Alternative 4: Again, the incorrect assumption is that the top 8km of upgraded gravel surface will only be accessible to 4x4 vehicles. See above.

Alternative 5: What new tourism opportunities, or is everyone just accepting that tarred roads bring opportunities without providing any evidence? The evidence around Lesotho points firmly to the contrary.

### SECTION 5: IMPACTS ON LOCAL COMMUNITIES:

Alternative 1: If pass remains open, status quo continues

Alternative 2: This section is incorrect as it assumes an upgrade will mean only 4x4's on the road. This is not the case as explained previously.

The current state of the pass does benefit the local community in a number of ways. It is part of our heritage as South Africans and Basotho and has an inherent value. From an economic perspective, it has led to a dramatic rise in tourism, leading to many sustainable tourism businesses in the KwaSani area. This has led to many stable families living in the area, created many direct and many indirect jobs. We look forward to the economic study highlighting this, especially as the data quoted so far are from many years ago. Current data will highlight the tremendous growth which has taken place. A

scenario should be developed taking this current growth rate based on current parameters forward 10 years!

The road is NOT often closed as stated in the report. Provide statistics to back this up!

We also contend that the cost of taxis on the pass is not significantly higher than on other routes. A taxi from Underberg to Pitermaritzburg costs around R65. A taxi from the Good Hope Store (the current terminus at the base of the pass) to Mokhotlong costs R70.

Alternative 3: Again the incorrect assumption about the road being restricted to 4x4 vehicles changes this section totally. This alternative would, we believe, result in the road being open to the maximum as a dirt surface allows the road to stay open far longer in snow and icy conditions than an all weather surface would.

Alternative 4: Again the incorrect assumption about the top section as an upgraded gravel surface remaining accessible only to 4x4 vehicles means that this section is incorrect.

Alternative 5: Just how substantially would travel times be reduced?

### SECTION 3.6 IMPACTS ON ROAD SAFETY:

Alternative 1: If road remains open, current levels of safety remain. Very very few accidents have taken place on the road in its current state.

Alternatives 2, 3 and 4: How does the current state of the road jeopardize safety? Any in any event, this scenario is for an upgraded gravel surface which will be good quality.

Alternative 5 (and the lower section of Alternative 4): we contend that an all weather surface will definitely result in an increase in speed, a blasé approach by drivers and a dramatic increase in accidents, often fatal in such terrain.

### SECTION 3.7 IMPACTS ON KZN – LESOTHO LINKS

Alternative 1; Status quo if road remains open.

Alternatives 2 and 3 (and upper section of alternative 4); Again the incorrect assumption that the road will be restricted to 4x4 vehicles makes these conclusions incorrect. An upgraded dirt surface will allow for much easier transit between KZN and Lesotho. Opportunities for growth and development can indeed be maximized. Trading and movement of people would NOT be restricted.

Alternatives 4 and 5 would produce almost exactly the same results here as alternatives 2 and 3, the upgraded gravel road.

### ISSUES IN THE COMPARISON TABLE PRODUCED:

Again, alternative 1 needs to be split into 1 (a) and 1 (b), or else we need 7 alternatives instead of 6!

As a con for the DOT under alternatives 2, 3 and 4, you have listed “permanent labour team required.” We in fact see this as a major pro. Such a permanent team would be responsible for filling potholes as they start to form (before they actually become potholes), for clearing drains and pipes before they become clogged, meaning that rivulets do not flow down the middle of the road, and that the maximum amount of the gravel which gets washed off the road is returned to it, ensuring that rocks, logs etc do not blocked drainage lines or pipes and other general road maintenance. Amongst other issues, this will not only ensure that the gravel surface remains in good condition and thus the road open to normal traffic, but also creating long term, sustainable jobs! The DOT in SA seems allergic to hand labour – a pick, shovel or wheelbarrow has not been seen on the Sani Pass road in years unless wielded by Basotho workers! This flies in the face of the need to regularly maintain the road (not just wait until it needs a machine, or until a machine becomes available), and also the need to create jobs for many labourers rather than 1 machine operator occasionally. We would like to see this proposal getting serious consideration in the report.

Alternative Impact on Tourism under alternative 2: No Growth in tourism. This flies in the face of the fact that 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. We expect the economic survey to demonstrate this fact clearly.

The incorrect assumption that alternative 2 means only 4x4 vehicles means the sections on community, safety and links need to be rewritten.

Alternative 3: states that impact causes at the top of the pass are not dealt with. Surely if alternative 3 includes sorting out the drainage, then the impact causes WILL have been dealt with.

It WILL be completely accessible to all tourists

Pass closures will be at their minimum

Will have the potential to maximize socio-economic linkages with Lesotho

Vehicles do NOT have to be 4x4

Alternative 4: is inconsistent with what has been written under other alternatives. Why “lengthy pass closures”? We disagree with “no growth in tourism”

Will be fully accessible and growth and development NOT restricted Vehicles do NOT have to be 4x4.

Alternative 5

Experience of Sani will be destroyed, not opened to all! Upgraded gravel surface will achieve “open to all”

Open other opportunities – what other opportunities? The report makes no mention of what is already happening in eastern Lesotho on the tourism front. We contend this is an important factor, and the impact on current tourism ventures of tarring the road across the highlands needs to be assessed

There will in fact be increased pass closures, especially during icy and snow conditions in winter

We do not believe there will be an increase in tourist traffic- there will be a decrease – see the WESSA survey which demonstrates that a large percentage of tourists stated they would not come at all if the road were tarred.

Alternative 6 – will not happen – we will not waste time discussing it!

#### SECTION 4.1

Quad biking seems to have been outlawed – the quad-biking operators have closed down their operations.

4.6.1 (c) Tourism enterprises in Lesotho should include Molumong Lodge and the pony trekking operator based there, St. James Guesthouse and the community tourism enterprise at No 10 Riverside at the very least!! We hope to see quantitative data on how health care and educational movements between Mokhotlong district and SA via Sani Pass, and also as to how many families are split across the border.

#### 4.6.2 ECONOMIC CONTEXT

This section is hopelessly out of date and thus totally misleading in its conclusions. We look forward to the economic survey producing up to date data on population, employment and incomes.

(d) seasonality: We contend that there is not really any season – some niches of the market have seasons, others do not and while there are peaks and troughs, tourism on the pass is a constant.

#### SECTION 5.6 PUBLIC PARTICIPATION PROCESS

We feel that attendance at the Open Day/Public Meeting was poor, especially if compared with the public meeting held to discuss phase 1 some years back. Whilst the public notification for the start of the EIA process was excellent, we feel that this day was not as well or as widely publicized. Possibly this is because it was only advertised relatively close to the date it took place on. In addition, the first weekend in December was not a good time with many people busy or away, and nor was a Saturday.

We hope that future public meetings are advertised further in advance, and suggest that they be out of school holidays and on a weekday.

#### SECTION 7.4.3 ECONOMIC STUDY

We feel it is imperative that the terms of reference for the economic study be broad enough to review the entire economic effects of the project. This means that the economic situation and future impacts need to be assessed not only for the KwaSani area, but for the whole Mokhotlong district as well as for the Butha Buthe area and/or eastern Free State towns where traders from Mokhotlong currently travel to.

We would also like the following points considered:

#### CONSTRUCTION PHASE

The term Environmental Control Officer is used and it is common for persons in this position to visit a site, say on a weekly basis. We would like an Environmental Site Officer to be engaged to be present throughout the construction, on a daily basis, with interaction with all members of the construction team, particularly drivers of heavy earthmoving equipment.

#### REHABILITATION.

- Costs: In reply to a question asked at the public session an estimated amount was given for the project together with an informed opinion that such projects commonly exceed the estimated amount threefold. In our opinion the successful rehabilitation of the construction footprint will dictate the sustainability of the project and for this reason it is imperative that a dedicated and adequate rehabilitation fund is secured up front.
- Specialist Continuity. The specialist engaged to undertake the required studies on flora, Dr Elsa Pooley, is highly regarded in her knowledge of the plants in the area and is, no doubt, an expert in this field. We would like to see continuity from the assessment phase carried through to the construction and post-construction phase with, if not in person, certainly the knowledge and methods employed by Dr Pooley implemented.
- Plant Rescue. This important aspect must be initiated at the appropriate season with adequate time given for a successful operation. We will support Dr Pooley's input in this regard.
- Existing damage from poor maintenance. Does rehabilitation of degraded areas beyond the road servitude form part of this aspect of the project? Attention to these degraded areas is a matter of extreme importance.
- Rehabilitation does not end at completion of construction and rehabilitation must continue to the satisfaction of Ezemvelo KwaZulu-Natal Wildlife.

#### PLAN OF STUDY FOR EIA

The Scoping Report, 7.3 Environmental Impacts and Issues and 7.4 Terms of Reference for Specialist Studies do not discuss floral, avian or terrestrial faunal studies. The Report includes a botanical species list only and we believe that additional studies on the flora and fauna species and their habitats may be important when one considers potential cumulative impacts.

We look forward to the identification and assessment of the cumulative impacts.

#### SUMMARY

In summary, WESSA believes that Alternative 3 is the best solution. We believe this is the win-win scenario in that it will satisfy ecological requirements (upgraded drainage and reduced erosion), tourism requirements (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), trade requirements ( an upgraded dirt surface will increase accessibility to trade vehicles and will remain open for the maximum days in the year, as well as reducing maintenance costs from the current situation) as well as safety requirements ( 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.

## SANI PASS DRAFT SCOPING REPORT R&S SUCHET RESPONSE

Having read the Draft Scoping Report and attended the Open Day/Public Meeting, we would like to congratulate the EIA Consultants on the job done so far. The report has endeavoured to cover all the many issues raised about the project and has acknowledged the many shortcomings and unanswered questions. We also feel that the 6 alternatives proposed for the road is a very good way forward in the quest to find the best solution to the problem. However, we feel that the report makes many incorrect assumptions, and comes up with a number of erroneous conclusions, and that some of these are crucial in weighing up the various alternatives. Our response will therefore concentrate on pointing out these inaccuracies.

SECTION 1.1.1 PHASE 1: As residents living at the 10.5km mark, we wish to register our strong disapproval with the ongoing construction works for phase 1. Phase 1 was in fact preceded by a resurfacing of the dirt surface which commenced in April 2005 and concluded at the end of December 2005. Phase 1 itself started in November 2006, and after 2 years of ongoing and intensive work, still appears to be far from complete. As residents and business owners on the road, we are sick and tired of the construction work. We have had to suffer from severe noise pollution, impacting not only on our ecotourism business, but also on our own psyche. We have had to suffer from a serious dust problem, especially in the dry seasons. We have had to suffer the ongoing disruption of stop/go systems, rough road surfaces and punctures to tyres, detours and dangerous driving by heavily laden trucks. Whilst some disruption to business and personal lives are quite acceptable in the greater public good, we feel that around 4 years of constant disruption are enough for anyone to have to tolerate for the public good. We understand that if phase 2 is approved, we will be subject to an absolute minimum of another 3 years of more of the same.

SECTION 1.4.2 NEMA: Your report states that chapter 5 of NEMA is aimed to provide development which is socially, environmentally and economically sustainable. We feel that this is a crucial issue, and that the specialist social and economic studies which will be conducted as part of the Impact Assessment MUST look at the sustainability of the 6 alternatives put forward, and that they must look not only at the micro-environment, but at the macro-environment. By this, we mean not only the KwaSani Municipal area, but rather the effects on international linkages. Studies should look at the quantitative impacts on the Mokhotlong area of 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. As tour operators running tours into Lesotho, we have some appreciation of the “bigger picture”, and feel that the scope of study so far has been too narrow.

This section of the report further states that a cautious and risk-averse approach is adopted. From the perspective of owners of 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”.

SECTION 1.4.5 HERITAGE: We would like to state 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 totally alter it. We therefore urge those preparing the specialist report on heritage to take the road as a whole as its starting point, rather than looking for individual heritage sites along the way.

SECTION 1.4.6 (a) SADC: Here for the first time since the project was proposed, the real motivation for the proposal is laid bare. This project is part of a regional transport/communications plan. The aims

of the plan are laudable, and we fully support them. However, this project is a classic case of someone in an office drawing lines on a map and making a decision without having any idea of the situation on the ground. The laudable objectives which SADC is trying to achieve would be far better served by keeping the Sani Pass as a gravel surface in conjunction with keeping all the roads in the Eastern Lesotho highlands as gravel surfaces. We know from our own clients that this is part of the appeal of eastern Lesotho to tourists – 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” who will be attracted. 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. While this may fly in the face of conventional logic which seems to be that tarring roads is always good for everyone, we believe that SADC and Lesotho needs to make detailed studies of the tourism situation and the future potential in eastern Lesotho before such ill conceived and far reaching projects are proposed. Since this is the very heart of the matter, we would like to propose that as part of the Impact Assessment process, that the top decision makers from SADC as well as from both the South African and Lesotho governments visit our area on a fact finding mission and that we are able to make our submission to such a delegation.

(b) MDTP: we find it hard to understand how the MDTP can contend that tarring the Sani Pass will lead to sustainable livelihood opportunities for people in eastern Lesotho, just as a statement and without a shred of supporting evidence. We know from our own experience that the result will be quite the opposite!

(d) World Heritage Site IMP: We note that it is stated that “roads that are heavily used should be all-weather” and would suggest that the Sani Pass is not and never has been heavily used, and neither is it ever likely to be. The need to upgrade to an all weather surface is thus not required under the WHSIMP.

(e) The IDP’s: Both of course look to provide growth and employment to people in their areas. We contend that tarring the Sani Pass will provide a short-term creation of employment in the actual road construction, but that it will result in harm to the tourism industry and thus it will lead to a long term decline in the very factors it is aimed to improve. As was the case in the St. Lucia debate, we contend that eco-tourism provides the best potential for future economic growth in both the KwaSani municipal area and the Mokhotlong district and that therefore all efforts should be made to assist such future growth potential. This clearly means leaving the road between Good Hope and Mokhotlong as a gravel surface.

**SECTION 2.2.1 DEPARTMENT OF TRANSPORT MOTIVATION:** Once again it becomes clear here that the Department is merely trying to implement orders from above – ie that a political decision was taken to do the upgrade prior to any consultation with local communities on either side of the border. The economic benefits listed are laughable:

1) Access to the UDP from Lesotho – who do the Department expect will be accessing the UDP from Lesotho? Is there any clear evidence of a great body of frustrated travelers trying to access the UDP from Lesotho?

2) The distance from the eastern Free State and Maseru to Durban will be reduced by 150km. This may be true, but what commercial traffic will use such a route, given that it will include 8 steep and winding mountain passes of between 2225m and 3240m. Negotiating this route will thus take longer than the existing flatter route via the Free State and the N3 and vehicles using the new route will most likely use more fuel. We suggest that actual tests are carried out to give quantitative data and times and fuel

consumptions on the existing and proposed routes. Surveys need to be carried out determining the potential volume of such traffic, or even of existing traffic travelling between Maseru and Durban.

3) The eastern Lesotho highlands will be opened up for tourism development. We contend that exactly the opposite will occur. Fine tarred roads exist in Lesotho into the highlands, from Butha Buthe via Oxbow to Mokhotlong and from Hlotse to Katse Dam, and in neither case has any meaningful tourism development taken place. Merely tarring a road does not magically produce tourists. Rather, it would be far more prudent to carefully study tourism initiatives such as our own which are succeeding in Lesotho currently, and to build on the successes of initiatives such as our own. We hope that the economic and social specialist studies will visit us and get our statistics and ideas as part of the process. 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.

4) Business links between Mokhotlong and Underberg and Pietermaritzburg. Again, this is merely taken as a given. We believe an in depth study is required. It has been suggested that the biggest obstacle to trade down the Sani Pass is not the road, but rather the customs requirements at the border. This needs further investigation. In addition, while tarring the road may lead to increased trade down the Sani Pass, this may be at the cost of trade between Mokhotlong and Butha Buthe or the towns in the eastern Free State, ie the pie will not be enlarged at all, it will merely alter who is getting a slice. In addition, an upgraded gravel road will achieve the same ends at a fraction of the cost and disruption.

5) Will accessibility be increased? We believe a gravel surface on the top section of Sani Pass is the best surface in terms of ensuring the road is open for the maximum number of days possible per year. The only time the existing road has been closed has been due to one massive thunderstorm incident in 2001 (we believe even a well-constructed tarred road would have been affected in such circumstances), 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.

6) A new scenic tourism route opened up. This can be achieved without an all weather surface – a good quality and well –maintained gravel surface will achieve the same results at a fraction of the cost or disruption. Namibia’s extensive network of gravel roads illustrates how such a network can be the basis of a highly successful tourism product.

Under the next section – reasons for the proposed upgrade:

1) We agree that drainage at the top of the pass is of great concern, and support any attempts to improve this. However, to suggest that there have been frequent closures of the road due to the gravel surface is totally incorrect. Again, no evidence has been advanced to support this sweeping statement.

2) We understand the concern about loss of gravel. However, in the first place, a much improved drainage situation, if achieved, would greatly reduce the amount of gravel which moves off the road surface itself. In the second place, a dedicated full-time maintenance team (a proposal we shall flesh out further on) will ensure that gravel is put back on the road from drains, pipes etc on a regular basis, again reducing the amount of gravel actually lost. And thirdly, to contend that suitable gravel is hard to find is rather blinkered. 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 ourselves and our tour guides over many years in eastern Lesotho, we are convinced that one of the reasons that gravel roads in Lesotho are usually in such good condition, and that they are drivable even in very wet conditions, is that they are built of basaltic soils. Since the very purpose of the project is touted as a cross-border initiative, we feel that there should be no problem with Lesotho providing road building material for an upgrade of the gravel surface of the road.

3) Erosion causes siltation in the Mkomazana river. This is of course true, but we hope that the specialist study will be able to quantify just how much runoff occurs due to the road itself. We suggest that a comparative study be set up between streams elsewhere in the range (for example, the Pholela

river in its upper reaches below Masubasuba Pass, the next valley south of the Mkomazana) where no road exists in order to compare how much “natural” erosion takes place and how much erosion is due specifically to the road in its current state. We contend that if drainage is improved, then even with a dirt surface, the amount of silt reaching the river will be much reduced. How much of the silt reaching the river, under improved drainage conditions will be from the road surface itself, and how much from the surrounds?

Paragraph 3 again talks about frequent closures of the road impacting negatively on people in the Mokhotlong area. There have NOT been frequent closures due to the road surface, this is factually incorrect and creates totally the wrong impression.

Paragraph 3 also raises the issue of dust. Again, this is at best highly exaggerated. Travel speeds on the pass are by necessity extremely low, and as a consequence the dust problem is far far less than, for example on the phase 1 section. Once again, a sweeping statement has been made with no evidence to back it up.

### SECTION 2.3 ROAD DESIGN:

At present, the road design has been done as though what is later stated as Alternative 5 is approved. We suggest that as part of the process, a design is made as though Alternative 3 is approved. This would be the ideal alternative as far as we are concerned, as long as it is done with the minimum of disruptive earthworks and thus preserving the fringe of roadside vegetation.

SECTION 2.3.3 Shotcrete is touted as the perfect cure for all ills! We contend that despite the best will in the world, one cannot turn concrete, however tinted or moulded, into nature! Chapmans Peak is a fine example of the use of shotcrete, and what an ugly result. (Not only that, but Chapmans Peaks is currently closed due the unstable slope, despite the millions spent on the project. Shotcrete is NOT the cure for all ills!) Other concrete stabilisation measures, for example near the top of Mafika Lisu Pass on the road to Katse, are equally ugly. The top of Sani Pass will ultimately look like a great dam wall once all the required stabilisation is complete.

The arrestor bed system seems like a good way to slow down the water velocity and retain gravel near the road, and here for the first time, ongoing maintenance is mentioned by hand-labourers! Great!

SECTION 2.3.4 MATERIAL SOURCES: We again urge the team to look at sources of basaltic soil within Lesotho, and to talk to the Lesotho Transport Department who are able to build and maintain good quality dirt roads in difficult mountainous conditions.

The contention that Phase 1 borrow pits will provide sufficient materials for phase 2 seem pretty far fetched to us on the ground! Phase 1 has ground to a halt due to lack of suitable materials, and the source of material for phase 2 needs to be a full part of this EIA process as otherwise all other plans could founder as is currently happening with phase 1.

2.3.6 DRAINAGE: We urge the engineers and the department to look at water flowing over the road with open minds, and to discuss ideas further 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. There are number of locations where water flowing over the road would not only be the best solution from an aesthetic point of view, but also from a practical point of view. Flooding has hardly ever caused the road to be closed, and where damage has been caused, it was because the approaches to the crossing were not up to standard.

2.3.7 PAVEMENT: We urge the design engineers to pay more attention to using a gravel surface, and to look into the ideas put forward in a submission to the process in terms of a substance which can be added to the gravel to reduce dust and destruction of the gravel surface. Whilst the efficacy of such substances may be doubtful, research should be done as part of this process.

2.3.8 CONSTRUCTION: We are encouraged at the recognition of the many complex issues surrounding the actual construction phase. However, we wonder what will happen if the SA Border post does not move before construction is due to begin? Will everyone be accommodated at the existing Phase 1 site? And has approval to continue to use this site been given by the landowners (Sani Pass Hotel?) We are also unhappy at the large amount of traffic which will be using the whole length of the road as the construction process takes place. This has a negative impact on the tourism value of the area, impacting on our business which has had to put up with many years of disruption already!

### SECTION 3 ALTERNATIVES:

We believe that this is a very useful way of taking the process forward and comment as follows –

The preferred option is given as Alternative 5 and we feel that all aspects of this option will need to be reconsidered in light of our first point above the global economic climate.

A number of incorrect assumptions have been made.

#### SECTION 3.1 DESCRIPTION OF ALTERNATIVES:

- The future of the road under alternative 1 is stated as closure of the road. We feel that this is one possible scenario, but that the road has continued along without any meaningful maintenance for the last 10 years (since the last major upgrade of the dirt surface) without having to be decommissioned. Therefore, your assumption that the road will have to be closed is rather extreme. We would rather see the road continuing as a poor condition, unmaintained road be used in assessing alternative 1, or else to split alternative 1 into an (a) closure and (b) road remains open. Should the road be closed, rehabilitation must be funded by the Department of Transport and signed off by KZNW when completed.

#### SECTION 3.2 IMPACTS ON DEPT TRANSPORT;

An estimate of the costs of construction and ongoing maintenance costs would be useful for each of the alternatives. This would assist in assessing the relative merits of each alternative vs their costs.

Alternative 1: impacts will be different if our suggestion above is accepted. Therefore, no upgrade with the road remaining open should still entail some maintenance costs.

#### SECTION 3.3 IMPACTS ON ENVIRONMENT

Alternatives 2 and 3 – we disagree that sourcing road material is a long term problem – the solution lies on the Lesotho side of the border, something which does not seem to have been considered at any stage. Given the purposes given for the project and its cross border nature, sourcing good material from within Lesotho seems a viable and long term option, 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.

#### SECTION 3.4 IMPACTS ON TOURISM:

Alternative 1, if split as we suggest, will not necessarily mean a closing of the road to tourists. It will in fact retain one element some tourists have stated as very important, namely the 4x4 nature of the route. This is in fact the best option for such “adventure” tourism.

Alternative 2: The report assumes that an upgraded gravel surface will result in the road only being open to 4x4 vehicles. This has been clearly demonstrated NOT to be the case. The upgraded gravel surface produced by the Basotho team in around 1998 resulted in all sorts of small sedan vehicles (eg Fiat Uno, Daihatsu Cuore) driving up and down the pass for around 2 years before lack of maintenance

caused the surface to deteriorate. (We strongly suggest that an in depth study into that upgrade be carried out in order to learn lessons from what took place in terms of the road construction, conditions and the impact the improved access had on tourism.) Lack of improvement to drainage will threaten this 2x4 status in the longer term, but will certainly result in sedan vehicles being able to use the road in the shorter to medium term, especially if there is ongoing maintenance.

Alternative 3: Once again, the erroneous conclusion is made that an upgraded gravel surface will result in the road being restricted to 4x4 vehicles. See above. This is a crucial assumption, as if one assumes that the road under alternative 3 is usable by normal vehicles, then alternative 3 fulfils a much larger number of the projects aims. The general public and locals now WILL be able to fully utilize and benefit from the road.

Alternative 4: Again, the incorrect assumption is that the top 8km of upgraded gravel surface will only be accessible to 4x4 vehicles. See above.

Alternative 5: What new tourism opportunities, or is everyone just accepting that tarred roads bring opportunities without providing any evidence? The evidence around Lesotho points firmly to the contrary.

#### SECTION 5: IMPACTS ON LOCAL COMMUNITIES:

Alternative 1: If pass remains open, status quo continues

Alternative 2: This section is incorrect as it assumes an upgrade will mean only 4x4's on the road. This is not the case as explained previously.

The current state of the pass does benefit the local community in a number of ways. It is part of our heritage as South Africans and Basotho and has an inherent value. From an economic perspective, it has led to a dramatic rise in tourism, leading to many sustainable tourism businesses in the KwaSani area. This has led to many stable families living in the area, created many direct and many indirect jobs. We look forward to the economic study highlighting this, especially as the data quoted so far are from many years ago. Current data will highlight the tremendous growth which has taken place. A scenario should be developed taking this current growth rate based on current parameters forward 10 years!

The road is NOT often closed as stated in the report. Provide statistics to back this up!

We also contend that the cost of taxis on the pass is not significantly higher than on other routes. A taxi from Underberg to Pitermaritzburg costs around R65. A taxi from the Good Hope Store (the current terminus at the base of the pass) to Mokhotlong costs R70.

Alternative 3: Again the incorrect assumption about the road being restricted to 4x4 vehicles changes this section totally. This alternative would, we believe, result in the road being open to the maximum as a dirt surface allows the road to stay open far longer in snow and icy conditions than an all weather surface would.

Alternative 4: Again the incorrect assumption about the top section as an upgraded gravel surface remaining accessible only to 4x4 vehicles means that this section is incorrect.

Alternative 5: Just how substantially would travel times be reduced?

#### SECTION 3.6 IMPACTS ON ROAD SAFETY:

Alternative 1: If road remains open, current levels of safety remain. Very very few accidents have taken place on the road in its current state.

Alternatives 2, 3 and 4: How does the current state of the road jeopardize safety? Any in any event, this scenario is for an upgraded gravel surface which will be good quality.

Alternative 5 (and the lower section of Alternative 4): we contend that an all weather surface will definitely result in an increase in speed, a blasé approach by drivers and a dramatic increase in accidents, often fatal in such terrain.

#### SECTION 3.7 IMPACTS ON KZN – LESOTHO LINKS

Alternative 1; Status quo if road remains open.

Alternatives 2 and 3 (and upper section of alternative 4); Again the incorrect assumption that the road will be restricted to 4x4 vehicles makes these conclusions incorrect. An upgraded dirt surface will allow for much easier transit between KZN and Lesotho. Opportunities for growth and development can indeed be maximized. Trading and movement of people would NOT be restricted.

Alternatives 4 and 5 would produce almost exactly the same results here as alternatives 2 and 3, the upgraded gravel road.

#### ISSUES IN THE COMPARISON TABLE PRODUCED:

Again, alternative 1 needs to be split into 1 (a) and 1 (b), or else we need 7 alternatives instead of 6!

As a con for the DOT under alternatives 2, 3 and 4, you have listed “permanent labour team required.” We in fact see this as a major pro. Such a permanent team would be responsible for filling potholes as they start to form (before they actually become potholes), for clearing drains and pipes before they become clogged, meaning that rivulets do not flow down the middle of the road, and that the maximum amount of the gravel which gets washed off the road is returned to it, ensuring that rocks, logs etc do not blocked drainage lines or pipes and other general road maintenance. Amongst other issues, this will not only ensure that the gravel surface remains in good condition and thus the road open to normal traffic, but also creating long term, sustainable jobs! The DOT in SA seems allergic to hand labour – a pick, shovel or wheelbarrow has not been seen on the Sani Pass road in years unless wielded by Basotho workers! This flies in the face of the need to regularly maintain the road (not just wait until it needs a machine, or until a machine becomes available), and also the need to create jobs for many labourers rather than 1 machine operator occasionally. We would like to see this proposal getting serious consideration in the report.

Alternative Impact on Tourism under alternative 2: No Growth in tourism. This flies in the face of the fact that 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. We expect the economic survey to demonstrate this fact clearly.

The incorrect assumption that alternative 2 means only 4x4 vehicles means the sections on community, safety and links need to be rewritten.

Alternative 3: states that impact causes at the top of the pass are not dealt with. Surely if alternative 3 includes sorting out the drainage, then the impact causes WILL have been dealt with.

It WILL be completely accessible to all tourists

Pass closures will be at their minimum

Will have the potential to maximize socio-economic linkages with Lesotho

Vehicles do NOT have to be 4x4

Alternative 4: is inconsistent with what has been written under other alternatives. Why “lengthy pass closures”? We disagree with “no growth in tourism”

Will be fully accessible and growth and development NOT restricted Vehicles do NOT have to be 4x4.

#### Alternative 5

Experience of Sani will be destroyed, not opened to all! Upgraded gravel surface will achieve “open to all”

Open other opportunities – what other opportunities? The report makes no mention of what is already happening in eastern Lesotho on the tourism front. We contend this is an important factor, and the impact on current tourism ventures of tarring the road across the highlands needs to be assessed

There will in fact be increased pass closures, especially during icy and snow conditions in winter

We do not believe there will be an increase in tourist traffic- there will be a decrease – see the WESSA survey which demonstrates that a large percentage of tourists stated they would not come at all if the road were tarred. This backed up by conversations with our own guests.  
Alternative 6 – will not happen – we will not waste time discussing it!

#### SECTION 4.1

Quad biking seems to have been outlawed – the quad-biking operators have closed down their operations.

4.6.1 (c) Tourism enterprises in Lesotho should include Molumong Lodge and the pony trekking operator based there, St. James Guesthouse and the community tourism enterprise at No 10 Riverside at the very least!! We hope to see quantitative data on how health care and educational movements between Mokhotlong district and SA via Sani Pass, and also as to how many families are split across the border.

#### 4.6.2 ECONOMIC CONTEXT

This section is hopelessly out of date and thus totally misleading in its conclusions. We look forward to participating in the economic survey producing up to date data on population, employment and incomes.

(d) seasonality: In our sector of the tourism market, the backpackers' market, there is not really any season.

#### SECTION 5.6 PUBLIC PARTICIPATION PROCESS

We feel that attendance at the Open Day/Public Meeting was poor, especially if compared with the public meeting held to discuss phase 1 some years back. Whilst the public notification for the start of the EIA process was excellent, we feel that this day was not as well or as widely publicized. Possibly this is because it was only advertised relatively close to the date it took place on. In addition, the first weekend in December was not a good time with many people busy or away, and nor was a Saturday. We hope that future public meetings are advertised further in advance, and suggest that they be out of school holidays and on a weekday.

#### SECTION 7.4.3 ECONOMIC STUDY

We feel it is imperative that the terms of reference for the economic study be broad enough to review the entire economic effects of the project. This means that the economic situation and future impacts need to be assessed not only for the KwaSani area, but for the whole Mokhotlong district as well as for the Butha Buthe area and/or eastern Free State towns where traders from Mokhotlong currently travel to.

We would also like the following points considered:

#### SUMMARY

In summary, we believe that Alternative 3 is the best solution. We believe this is the win-win scenario in that it will satisfy ecological requirements (upgraded drainage and reduced erosion), tourism requirements (4x4 funds 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), trade requirements ( an upgraded dirt surface will increase accessibility to trade vehicles and will remain open for the maximum days in the year, as well as reducing maintenance costs from the current situation) as well as safety requirements ( 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.

Russell and Simone Suchet

Sani Lodge Backpackers and Drakensberg Adventures

**Govender,Sanusha**

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**From:** Delia Gardner [deliagardner@acutts.co.za]  
**Sent:** 23 January 2009 01:56 PM  
**To:** Govender,Sanusha  
**Subject:** Re: EIA SANI PASS

**QUARRIES ARE UGLY AND DANGEROUS.**

Further to the concerns concerning the quarries which were raised at the meeting held in Underberg School in December, our fears concerning the detrimental environmental effect of the quarries needed to provide the materials for the road surfacing are now coming true.

Long standing residents of our area will have their quality of life on their family farms destroyed by the quarry activities proposed. The latest is a quarry right in front of Russell Watson's farm house on the Lotheni Road. The quarry will be in their line of vision from their verandah. It is in front of their farmhouse which is run as a guest lodge. The dust will have adverse health effects for their family guests and livestock. Peace and tranquillity will be a thing of the past. A very beautiful valley will be desecrated for a long period of time and it will not be able to be returned to its present state.

This proposed quarry site is clearly visible from the road as well. This road which runs from Himeville to Nottingham Road would rival Chapmans Peak Drive in terms of beauty if it was developed. It would link two extremely popular tourist areas and could create an international tourist attraction with beneficial effects to the communities at both ends and on the road. However this would depend on the pristine scenery being retained. This quarry would be an absolute blot on the landscape and the activity of the lorries will create a traffic hazard.

There has already been a death on the Pevensey Road owing to the dangerous driving of the lorry drivers and the locals have had to avoid using this road if possible as they have feared for their lives having had near misses as these lorries tear past.

**DELIA GARDNER  
HOLLYBROOK FARM  
033 7020550  
082 852 8656**

## Govender, Sanusha

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**From:** Arbuckle House [arbucklehouse@telkomsa.net]  
**Sent:** 23 January 2009 03:06 PM  
**To:** Govender, Sanusha  
**Subject:** Re: corr to SAni IAP'S

Dear Sanusha Govender,

Thank you for the email.

With reference to the upgrading of the road to the top of Sani Pass I am not in agreement with it as are all the other Bed and Breakfast establishments in the area.

I have a lot of guests from overseas and they are horrified when they hear that the road is to have a hard surface put on. They all agree that the magic of an 'African' experience will be lost and Sani Pass will be just 'another' pass that any vehicle can negotiate.

I just feel that it would be far more beneficial if the money was spent on tarring the road between Himeville and Nottingham Road. This would bring more tourism to our Village.

Kind regards,  
Geraldine McFarlane  
ARBUCKLE HOUSE Bed and Breakfast and Self-Catering  
\* \* \*

## Govender, Sanusha

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**From:** Thaba Tours [thabatours@futurenet.co.za]  
**Sent:** 26 January 2009 08:25 AM  
**To:** 'Govender, Sanusha'  
**Subject:** RE: corr to SAni IAP'S

Dear Govender

We have already reported on this road, we do not want it upgraded, you should have this in writing from 50% different other people, look back in your records.

Kind Regards.  
Ray Watt  
**THABA TOURS & 4X4 ADVENTURES**  
P.O BOX 361, Underberg 3257  
Tel: (033) 7012 333/888  
Cell: 083 353 5958  
Fax: 0866 575468  
E-mail: [thabatours@futurenet.co.za](mailto:thabatours@futurenet.co.za)  
Website: [www.thabatours.co.za](http://www.thabatours.co.za)

**Govender, Sanusha**

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**From:** Bianca Viljoen [biancav@rsv.co.za]  
**Sent:** 09 February 2009 12:30 PM  
**To:** 'sgovender@gibb.co.za'  
**Subject:** SANI PASS  
**Importance:** High  
**Attachments:** image001.emz

Good day Mr. Govender,

I have had the privilege of going up Sani Pass for the first time during November 2007.

I am planning another visit to Sani Pass during March this year for "old times sake" before the proposed tarring of the pass is perhaps finally approved.

I have since also read various articles on the Sani Pass and in particular your efforts to convince authorities that the pass should not be tarred.

I can only agree and emphasize that the actual experience associated with the Sani Pass is the fact that it is not a tarred road and that it is actually an exceptional experience for those having access to 4x4 vehicles. Now, before anyone accuses me of being an avid supporter of "exclusiveness" which people with access to 4x4 vehicles may enjoy, 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.

You have my 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.

Regards,

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