



Gariep Watch

P.O. Box 2536, Upington, 8801

22 September 2020

EnviroAfrica CC
P.O. Box 5367
Helderberg
7135

ATTENTION: MR. CLINTON GEYSER

COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT: TOWNSHIP DEVELOPMENT ON ERF 1, 45 AND 47 WEGDRAAI: !KHEIS LOCAL MUNICIPALITY

The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development of 360 erven on 45 ha at Wegdraai has reference.

Thank you for registering Gariep Watch as an Interested and Affected Party and incorporating our correspondence of 17 June 2020 in the draft Scoping Report. This letter highlighted our concerns that pertain to the lack of wastewater infrastructure and maintenance of existing wastewater infrastructure at the !Kheis local municipality.

We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Wegdraai community. However, the process of urbanization and population growth, if not handled carefully, may result in increased surface and ground water pollution towards the Orange River. Intensive urban growth far from job opportunities can also lead to greater poverty with the local government unable to provide services for all people.

Our comments pertaining to this application for Wegdraai are as follows:

1. The proposed extension of the Wegdraai settlement will interfere with a juncture of well-defined drainage lines as shown in Plate 1. This ephemeral stream has a large catchment within the proposed development area and flows directly into the Orange River.

Although the identification of site alternatives may not be feasible as noted in the Scoping Report, layout alternatives should be considered especially since the development is proposed within a Critical Biodiversity Area and incorporates this ephemeral stream with its many tributaries.

This ephemeral stream can be avoided completely by tailoring the proposed layout to exclude drainage lines, corridors or riparian zones.



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Plate 1: Ephemeral stream with its many tributaries in the proposed development area

2. The existing oxidation pond system situated to the north of Wegdraai is in disrepair as shown in Plate 2. It is uncertain where the wastewater is disposed of but not inconceivable that it is discharged into the veld nearby where ground- and surface water resources can become polluted. This aspect should be investigated as part of the EIA.



Plate 2: Wegdraai oxidation pond system in disrepair



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3. It is recommended that specialist botanical studies should be performed as part of the EIA to delineate the watercourses and its associated vegetation. A ground water investigation should also be performed as part of the freshwater impact assessment.

4. River health indices will not be feasible on the ephemeral drainage lines but could be conducted in the Orange River up-stream and down-stream from the proposed development.

Aspects pertaining to solid waste, stormwater, groundwater and wastewater management should be key components of the Environmental Impact Assessment. All necessary measures must be put in place to prevent any pollution from reaching the Orange River.

Please feel free to contact Gariep Watch if there are any questions or queries.

Yours sincerely

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