



Klipriviersberg Nature Reserve Association

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BY HAND

12 October 2006

Tswelopele Environmental (Pty) Ltd
259 Kent Avenue
Randburg

Dear Sir/Madam

Objection – Reference 0657/0161

GAUT 002/06-07/0: Proposed Erosion Protection and Storm water Attenuation on the Bloubos Spruit within the Klipriviersberg Nature Reserve.

The Klipriviersberg Nature Reserve Association, a registered non-profit organization with in excess of 700 members, is a stakeholder in the Klipriviersberg Nature Reserve and has a direct interest in the management, maintenance and utilisation of the reserve. In principle, the Association is not opposed to erosion protection and storm water attenuation on the Bloubos Spruit within the reserve. The Association must however, of necessity, object to this being done without an accompanying environmental impact assessment.

The Association therefore hereby registers its objection to exemption being given to the conducting of an environmental impact assessment, on the following grounds:

1. The work to be undertaken is within the confines of a proclaimed nature reserve and as such, an environmental impact assessment must be a prerequisite. It is imperative in order to ensure:
 - a. Proper architectural planning so that the construction blends in with the natural surroundings and is as unobtrusive as possible.
 - b. Proper planning of the work to be undertaken so as to minimize damage to the surrounding area.
 - c. Predetermined and limited access routes to the construction sites.
 - d. Proper supervision by a competent environmentalist.
 - e. Protection of archaeological sites which are scattered around the reserve. Rocks must under no circumstances be removed from these ruins.
 - f. Removal of all rubble, waste and litter.
 - g. Proper and thorough rehabilitation of any damage caused to access routes and construction sites.
2. The possible presence in the reserve of a red data butterfly, *Metsella meninx*. Host plants occur in the area and the species has previously been recorded in the reserve.

3. Historical sites occur along and on the Bloubos Spruit, namely,
 - The Vierfontein dam wall whose construction was undertaken in the 1890's, and
 - a weir and furrow that runs along the stream built more than 100 years ago. These were used to irrigate the garden, orchards and farming lands.

4. A natural wetland exists in the South-West section of the reserve and is located close to the Bloubos Spruit. The wetland is the only alternative source of water for the game in the reserve during times when the Bloubos Spruit is polluted. This happens regularly as a result of sewerage and other spills in the suburbs. The impacts of construction work on the Bloubos Spruit needs to be examined to ensure that the natural wetlands will not be affected by:
 - Unnatural flooding
 - Pollution

5. All other potential negative impacts of the construction work need to be examined because of the fact that construction will occur in a proclaimed reserve.

The Association is keen to ascertain exactly what and where work is to be undertaken. Construction of dams, levees or weirs may well fit in with the development plan for the reserve, as it has long been the intention to attract water birds to the reserve. Any such construction would need to be properly researched by experts and agreed to by both Johannesburg City Parks and the association.

Kindly acknowledge receipt of this letter by signing the attached copy thereof.

Yours faithfully
**Klipriviersberg Nature
Reserve Association**

C P Kourie
Honorary Chairman

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