24th March 2007

Sindh Environmental Protection Agency
EPA Complex, ST-2/1, Sector-23,
Korangi Industrial Area
Karachi
Ph: 506-5950, 506-5637

Att: **Mr Naeem Ahmed Mughal**
Deputy Director (EIA)

Dear Sirs,

Re: **Karachi Elevated Expressway**

> The wisdom of Enrique Penalosa, the Mayor of Bogota, Colombia during 1998-2000, who successfully addressed most of the city's traffic problems, is pertinent:
>
> ***"It is very clear today that solving traffic problems by buildings more and bigger roads is like trying to put out a fire with gasoline".***

We refer to your public notice in the DAWN of 2-3-2007, and submit herewith our comments on the Environmental Impact Assessment (EIA) Report prepared by the CDGK consultants.

Procedural:

1) Powers under *PEPA (Review of IEE & EIA) Regulations 2000* have not been delegated to the Sindh Province, and consequently Federal EPA must conduct the EIA. In any case, powers have not been delegated by the Provincial Government to the Sindh EPA u/s 26(2) *PEP Act 1997*.
2) Guidelines to ensure *"effective public consultation, involvement and participation in EIA assessment"* have not been issued by the Federal EPA.
3) A *"Committee of Experts"* u/s 11(2) and 23 of the *Regulations 2000* to review the EIA has not been formed u/s 10(6) of *Regulations 2000*. Additionally, a "*Sectoral Advisory Committee*" u/s 5(6) of the *Act 1997* is not available for the Transport Sector.

Technical:

4) The identities, qualifications, and experience of the technical consultants (whose name is not given in the report) in the field of transportation and traffic planning are not known or disclosed. Such a critical and complex issue as the KEE must be addressed with great expertise.
5) The KEE is the 'political brainwave' of the CDGK, and the EIA (and feasibility) is an effort to justify and 'prop-up' a traffic solution that is not required presently by Karachi, a project that is expensive, environment-unfriendly and

economically unfeasible, a project that has been shoved into the new Master Plan (not a project that has emerged from master planning studies).

6) The major components of cheap and cost-effective solutions to traffic problems in the city of Karachi that need to be implemented include the following:
   a) Enforcement of traffic discipline: Sharah-e-Faisal can presently handle many times its present traffic-load if driving regulations are strictly enforced by the Police, and a continuing public education campaign for safe and correct operation of vehicles is undertaken by the government. These actions would not only benefit this Jinnah Bridge - Quaidabad corridor, but all corridors of the city, slashing wastage of fuel, cutting vehicle pollution, reducing congestion, and saving citizens' man-hours and mental stress in unnecessary traffic jams. Traffic confusion is exacerbated by non-use of bus-lanes, slow traffic occupying the fast lane, frequent switching of lanes without signaling, speeding, not stopping at the red-light, jay-walking, etc
   b) Relocation of critical activities: Many vehicle trips would become unnecessary if markets were re-sited to more appropriate locations, tankers were filled at the northern outskirts of Karachi, etc.
   c) Enforcement of non-peak timings for heavy traffic: Tankers, trucks and other heavy vehicles must only be allowed to use city roads outside working hours and on holidays. This is presently weakly implemented.
   d) Parking discipline: Commercial areas and school locations (which are springing up all over the city in violation of town-planning laws) generate parking chaos on the roads, thus reducing traffic capacity. This is very common on Sharah-e-Faisal, especially in the sections between Sharah-e-Quaideen Flyover and Awami Markaz, and between Airport and Quaidabad. As mandatory parking spaces in buildings are unlawfully converted to commercial and storage uses, cars are parked two and three deep on many roads.
   e) Removal of road encroachments: Thela-wallas, khokas, and street-vendors occupy pedestrian pavements and roads, forcing citizens to hazardously walk on the roads, consequently reducing their traffic-handling capacity. This is common on Shahrah-e-Faisal between Airport and Quaidabad.
   f) Proper signals & traffic control: The existing capacity of Shahrah-e-Faisal can be significantly increased by properly engineered traffic-signal systems, including provision to see that they do not go off with KESC failure.
7) Air pollution will increase below the expressway deck and adversely affect the health of area residents and visitors, especially in section where high-rise structures adjoin the KEE on both sides. There are international studies on this subject.

8) Noise pollution, especially at night, will affect the residents of buildings at the deck level of the expressway and will exceed internationally approved levels.
9) The shadows cast by the expressway, especially between high rise buildings will spread a gloom on the area and affect greenery and plantation on the median.
10) The 4-lane KEE has no emergency lanes/shoulders for vehicles: this cannot be allowed.
11) The storm drainage of the KEE must fit in with the storm drainage plan of Sharah-e-Faisal and of the rest of the city. Consequently, the storm drainage plan of the rest of the city will have to be prepared first.
12) There are two major highways (Northern Bypass & Lyari Expressway) presently under construction in Karachi to get port traffic out of the city. These highways are already oversized for the existing & projected heavy traffic for many coming years. Why does Karachi need another expressway? Can the money not be spent on more needy and well-planned works?
13) The project is not based on an analysis of a comprehensive traffic-management plan for the city of Karachi, but seems to be a piecemeal approach, a grandiose plan to obtain political 'kudos'. The existing and future traffic data quoted is skimpy, and is supposedly based on SUPARCO and ??? data (the Halcrow Traffic Study data has not been made available).
14) While the EIA Report strongly states "*The main benefit of the project will be the long-awaited recognition of status of the Strategic Corridor …. as the main corridor for movement of vehicular traffic from Karachi Port to Port Qasim*", no figures have been given on the amount of such traffic. It is doubted that the number of vehicles between the two ports justifies the expenditure of such a humungous amount of money.
15) The effects of additional traffic attracted by the KEE ("transferred traffic", "induced traffic") have not been considered, and the congestion on the roads leading to KEE has been ignored.
16) The buffer/staging areas at the toll-plazas seem inadequate. Will it lead to the common situation observed at CNG stations around the city where waiting cars in line choke the approach roads?
17) The locations of exits are not optimal: they have been sited where place exists not where need exists.
18) Decentralization of the city (a Master Plan objective) will be defeated, as the pressure will remain on the Saddar and Chundrigar CBDs.
19) There is no emergency/disaster plan or policy to regulate/deal with the adverse effects of toxic spills (petroleum products, explosives, corrosive chemicals, contamination, etc) on the KEE, and its hazardous effects on adjacent residential and commercial areas.

20) At least two flyovers on Sharah-e-Faisal, presently under planning, have not been taken into account:
   - ✓ To Chanesar Halt, near Nursery
   - ✓ To Lines Area, near Aisha Bawany School

21) The traffic diversion plan during the three year (?) construction period is not clear. Karachi will exist in madness during this time, especially during VVIP movements.

22) The city, provincial and federal governments are being shortsighted and extremely derelict in their duty when they encourage more and more private cars to come on the roads. Most of these cars have single occupants and are detrimental to the economic and environmental health of the city. (See copy of op-ed item entitled "*Cities for cars or people?*" in NEWS dated 28-3-2005). The alternatives to the KEE, especially a proper mass-transit system, have not been examined properly or exhaustively, or on a scientific basis. Case studies from other mega-cities in Asia, including their bad experiences with elevated expressways, have not been included.

23) The city administration must study and emulate the example of cities like Bogota where government policies have radically reduced the number of cars on the city streets and improved the quality of life for all. There are seven good reasons justifying suppression of urban automobile traffic:
   - ✓ Insufficient infrastructure to support sharply increasing numbers of vehicles
   - ✓ Development of required infrastructure occupies vast areas of city centers
   - ✓ Accidents, noise and exhaust have negative socio-economic impact
   - ✓ Traffic congestion adversely affects public transport for non-automobile owners
   - ✓ Public transport is needed for efficiency and flexibility
   - ✓ Private automobiles waste scarce resources
   - ✓ Automobiles damage the environment of residential and commercial areas

24) The increased traffic will generate additional greenhouse gasses leading to global warning/climate change. Pakistan's "ecological footprint" is already 100% greater than its "bio-capacity" (see WWF's "Living Planet Report 2006" downloadable from <assets.panda.org/downloads/living_planet_report.pdf>). We cannot afford to implement projects and polices that will worsen the situation

Financial:

25) Why has this juicy contract (US $350 million as stated in the 8-9-2006 Working Paper for Stakeholders at the Scoping Meeting, and likely to increase further) been awarded without open tendering? The government, with the assistance of Transparency International, has issued strict guidelines on procuring bids and prices, and this lawful procedure has not been followed in the instant case. (Please study the attached article published in the

Malaysian press: "*Why are there so few successful bumiputera contractors?*" by Koon Yew Yin, a founder of IJM Corporation Bhd.

26) The US $350 million projected costs of the project (already up from the initial US $225 in early 2006), which apparently do not include land acquisition payments for 15 acres of land (adding perhaps another US $150 million to the total) are very high. Other typical recent costs in Asian countries are as follows:

Expressway	*Length*	*Total Cost*	*Cost/km*
Karachi Elevated Expwy, Pakistan	25 km	$350m	$14m/km
NKVE Interchange, Malaysia	7.5 km	$43m	$5.8m/km
Bangalore-Hosur Expwy, India	9 km	$108m	$12m/km

27) The economic feasibility of the project is not clear. What is the proposed toll charge? Is there any kind of government guarantee to the 'annuity-basis' project developer and operator? If there is, the citizens' taxes will be paying for the losses in running the KEE for many years. Consequently, in all fairness, facts and figures must be made transparent so that the citizens can decide on the cost-benefit ratio.

We will assist you during the public hearing proceedings by presenting additional points.

Sincerely,

Mrs Amber Ali bhai
General Secretary
Shehri: CBE

encl: as above

cc Federal Secretary, Environment
Provincial Secretary, Environment
DG, Pakistan EPA
Nazim, CDGK
DG, EPA (Sindh)