

3rd June 2010

Mr. Naeem Ahmed Mughal
Director General
Environmental Protection Agency
Government of Sindh
ST-2/1, Sector-23
Korangi Industrial Area, Karachi



Re: **Comments/objections to EIA Report**
Signal-Free Corridor-4 (Sharah-eFaisal)

Dear Sir

Apropos your public notice dated May 15, 2010 in Daily Dawn, we have the following observations and objections to make:

- 1) Our basic contention is that the SFC-4 project:
 - a) is not required, as more sensible, cheaper and environmentally-sustainable alternatives are available,
 - b) is a waste of scarce public/taxpayer resources, and
 - c) exacerbates, in the medium and long term, the traffic congestion and noise/air pollution problem in the city of Karachi

In the words of that world-famous urban strategist and former Mayor of Bogota, Enrique Penalosa, who was invited to Karachi by the CDGK in 2007 to expound on traffic issues: ***“To make more highways or bigger roads to solve traffic jams is like trying to put out a fire with gasoline.”*** The CDGK’s construction of flyovers/over-passes (which is equivalent to enhancing road capacity) is unfortunately moving towards a ‘car-friendly’ city at the expense of a ‘people-friendly’ city.

- 2) The essential problems with constructing eight additional flyovers on this “elitist Corridor 4” * are succinctly summed up in the following statements :

a) <i>“Deficiencies in the public transport services together with the enormous increase in private vehicle ownerships during the 2005-08 period have aggravated the road transportation problems.”*</i>	CDGK must reduce single-occupancy vehicles (cars) on the roads, and implement affordable & convenient public transport systems : CNG buses, bus rapid transit (BRT) systems, circular railway, etc
--	---

Page 1/3

Donations to Shehri-CBE are approved under Section 2(36)(c) of the Income Tax Ordinance, 2001

SHEHRI-CBE, 206-G, Block-2, P.E.C.H.S., Karachi-75400, Tel : 4530646, 4382298, Fax : 92-21-4530646
E-mail: info@shehri.org, shehri@cyber.net.pk (web site) URL: <http://www.shehri.org>



b)	<i>"Corridor 4 is already heavily congested as well as polluted due to operation of a dilapidated transport system."</i>	The public transport system (most of it in the private sector) must be improved/subsidized on a war-footing
c)	<i>"Project Proponent/Contact Person: EDO (Works & Services) CDGK"</i>	Traffic/road-planning is not within the purview of the Work & Services Department. It is the function of the Planning Departments: Transport, Traffic Engineering, Master Plan

*All italicized statements in this para have been taken from the EIA Report

- 3) While short-term relief may be obtained at intersections, the consequential increase in traffic (especially private cars) will increase congestion, noise and air pollution. Thus flyovers/overpasses are 'band-aid solutions' which divert human, political and financial resources from the actual alternative solutions outlined below. While we have been hearing for the *past three decades* about effective mass transport systems for Karachi, all we see are billions of rupees spent by successive administrations on flyovers, overpasses and road-widening --- money that could have been utilized for public transport systems.
- 4) The CDGK is being shortsighted when they encourage more and more private cars to come on the roads by providing signal-free 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 of 28-3-2005 <<http://pakteahouse.wordpress.com/2007/11/24/from-karachi-cities-for-cars-orpeople/>>).
- 5) The need of the pedestrians of Karachi has not been catered to. Signal-free/high-speed roads cater to the 5% high-income who own cars, and ignore the requirements of the 95% middle/low income (see *Annexure-A*). The majority of citizens find it dangerous to cross existing signal-free corridors in Karachi, and the number of fatal accidents on these corridors has increased. The number of over-head pedestrian bridges (existing and planned) is completely inadequate.
- 6) The ostensible purpose of the Corridor-4 exercise is to improve the traffic-handling capacity of Sharah-e-Faisal. Recognizing that traffic flows smoothly through the narrow streets of central London (without any flyovers), we need to carefully examine alternative techniques and improvements (see *Annexure-B*). Please understand that many of these techniques merely involve implementing the existing traffic, parking and encroachment laws.



- 7) The exhaustive consideration of alternatives, which is a primary and critical part of an EIA report, has merited less than two pages in this 283-page document. It shows that the EIA study is a paper exercise 'to fill the stomach of the file'. The CDGK (and SEPA) is not seriously interested in properly investigating other options and choices to solving the traffic problems of Sharah-e-Faisal and other roads of Karachi, or in complying with the environmental laws.

This is also apparent from the fact that

- a) originally an IEE for four flyovers was submitted by CDGK and approved by SEPA (despite numerous letters from Shehri asking for an EIA) so that the voice of the citizens could be suppressed, and
 - b) construction has commenced on flyovers (e.g., Tipu Sultan Road) that have not been approved even in the IEE, and SEPA has taken no action to stop this blatant violation of the law.
- 8) Our preliminary comments on the Corridor-4 plan are given in *Annexure-C*.
- 9) Please study the attached graph, 'The hockey stick', which shows how the world is over-consuming and is headed towards catastrophe (download and read: westcoastclimateequity.org/2009/07/05/beyond-the-hockey-stick-infinite-growth-is-impossible/). We need to simplify our choices and find/implement sustainable solutions.

We will be submitting additional comments at the hearing.

Sincerely,

Mrs Amber Ali bhai
General Secretary
Shehri: CBE

Encl: *Annexures-A to -D*

- c.c. Federal Secretary, Ministry of Environment (GoP)
Secretary Environment, Sindh
Director General, Pakistan EPA
Administrator, CDGK
EDO (MPGO), CDGK
EDO (Transport & Communications), CDGK
DG, Traffic Engineering, CDGK

Sample photographs of traffic issues on Sharah-e-Faisal during peak hours

The traffic-handling capacity of the existing at-grade road could be increased manifold, if the relevant laws and traffic discipline were implemented, including the following:

1. Mark lanes & ensure proper use (bus lanes, faster traffic on right, motorcycles and slow traffic on left, switching lanes after signalling, proper turn/entry/exit lanes, etc)
2. Enforce NO PARKING (even on service roads) and NO STOPPING very strictly
3. Enforce speed limits
4. Enforce stopping at the RED lights
5. Eliminate jay-walking
6. Remove encroachments, thelas, khokas, etc on the road



Spill-over, chaotic parking in front of commercial buildings; thelas & other encroachments



Parking in bus-stop reservation; messed up service road



Illegal parking on the main Sharah-e-Faisal, a regular & common feature



Illegal parking on Sharah-e-Faisal, a regular & common feature



**Residential side-streets have become one-way!
Traffic bottleneck at intersection**



**Cross Sharah-e-Faisal at peril to your life! And
consequently confuse & slow down traffic**



**Eight lanes of traffic! No space for faster traffic in
right-most lane**



**Illegal parking on Sharah-e-Faisal, a regular &
common feature**



**Illegal parking on the main Sharah-e-Faisal, a
regular & common feature**



**Policeman has to dance to get pedestrians across
Sharah-e-Faisal!**



Policeman has to dance to get pedestrians across Sharah-e-Faisal!



Policeman has to dance to get pedestrians across Sharah-e-Faisal! Motorcyclists ignore him



Policeman has to dance to get pedestrians across Sharah-e-Faisal! Motorcyclists ignore him



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Motorcyclists in fast lane



Encroachments & thela-wallas in Baloch Colony overpass bypass lane, thus clogging main road



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Cyclist moving to the right into a faster lane!



Motorcyclists occupy all lanes



Gas cylinder supplier advertises on Sharah-e-Faisal in front of bus stop



Illegal parking on Sharah-e-Faisal, a regular & common feature



Illegal parking on Sharah-e-Faisal, a regular & common feature



Illegal parking on Sharah-e-Faisal, a regular & common feature



Illegal parking on Sharah-e-Faisal, a regular & common feature



Illegal parking on Sharah-e-Faisal, a regular & common feature



Uncontrolled U-turn adds to the confusion and slowdown of traffic



Much pedestrian movement under the overhead bridge



Illegal parking, thelas and encroachments on Sharah-e-Faisal, a regular & common feature



Illegal parking, thelas and encroachments on Sharah-e-Faisal, a regular & common feature



Illegal parking, thelas and encroachments on Sharah-e-Faisal, a regular & common feature



Encroachments & shops in the middle of Sharah-e-Faisal!



Garbage dump occupies a substantial portion of Sharah-e-Faisal ROW!



Loading & unloading space that occupies two lanes on Sharah-e-Faisal!



CDGK dumpster occupies two lanes on Sharah-e-Faisal!



Parked transport vehicles occupy two lanes on Sharah-e-Faisal!



Parked heavy transport vehicles occupy two lanes on Sharah-e-Faisal!



How to cross under an overhead pedestrian bridge!



How to cross under an overhead pedestrian bridge!



Parked customers in the bus-stop setback



Complicated U-turn and pedestrian crossing



Complicated U-turn and pedestrian crossing



Uncontrolled entering & exiting traffic clogs up the main road traffic



Uncontrolled entering & exiting traffic clogs up the main road traffic



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Cross Sharah-e-Faisal at peril to your life! And consequently confuse & slow down traffic



Who will win? The bus or the pedestrian?



How many lanes does this road have?



Illegal spillover parking from high-rise buildings on Sharah-e-Faisal



Chaos at exit/entry points to Sharah-e-Faisal complicates main road traffic



Khoka encroachment on the public pedestrian pavement, typical of widespread contempt for law



**Student crosses Sharah-e-Faisal at peril to his life!
And consequently confuses & slow down traffic**



**Cross Sharah-e-Faisal at peril to your life! And
consequently confuse & slow down traffic**



Motorcyclists in fast lane



Alternative improvements to the traffic system of SFC-4 & Karachi

The major components of sensible, cost-effective and sustainable solutions to traffic problems on Sharah-e-Faisal (particularly, and in the city of Karachi generally) that need to be implemented by the CDGK and Traffic Police include the following:

- 1) Enforcement of traffic discipline: Sharah-e-Faisal can presently handle many times its present traffic-load if driving laws/regulations are strictly enforced by the Traffic Police/Wardens, and a continuing public education campaign for safe and correct operation of vehicles is undertaken by the CDGK. These actions would not only benefit this Corridor-4, but all corridors and arteries/roads/streets 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, slower traffic occupying the fast lane, frequent switching of lanes without signaling, over-speeding, not stopping at the red-light, jay-walking, etc
- 2) Relocation of critical activities: Many vehicle trips would become unnecessary if markets were re-sited to more appropriate locations, oil-tankers were filled at the northern outskirts of Karachi rather than entering the city, etc.
- 3) Increased utilization of train services: Substitution of road transport (passenger and freight) with environment-friendly and cheap railway, especially for Karachi and Bin Qasim port traffic.
- 4) Proper enforcement of non-peak timings for heavy traffic: Tankers, trucks and other heavy vehicles must only be allowed to use Sharah-e-Faisal and other city arteries outside working/peak hours and on holidays. This is presently very weakly implemented.
- 5) Parking discipline: Commercial areas and school locations (which are springing up all over the city in brazen violation of building/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 increasingly and unlawfully converted to commercial and storage uses, cars are parked two and three deep on many roads and service lanes.



- 6) Removal of road encroachments: *Thela-wallas*, *khokas*, and street-vendors occupy pedestrian pavements and roads, forcing citizens to hazardously walk in the path of traffic, consequently reducing road traffic-handling capacity. This is common on Sharah-e-Faisal between Airport and Quaidabad.
- 7) Proper signals & traffic control: The existing capacity of Sharah-e-Faisal can be significantly increased by properly engineered traffic-signal systems, including provision (standby supplies) to ensure that they do not go off with KESC failure.
- 8) Elimination of jay-walking: Pedestrians must be educated to cross the streets/roads at approved cross-walks and in coordination with traffic lights. Vendors (newspaper-hawkers, beggars, etc) at intersections must be removed.

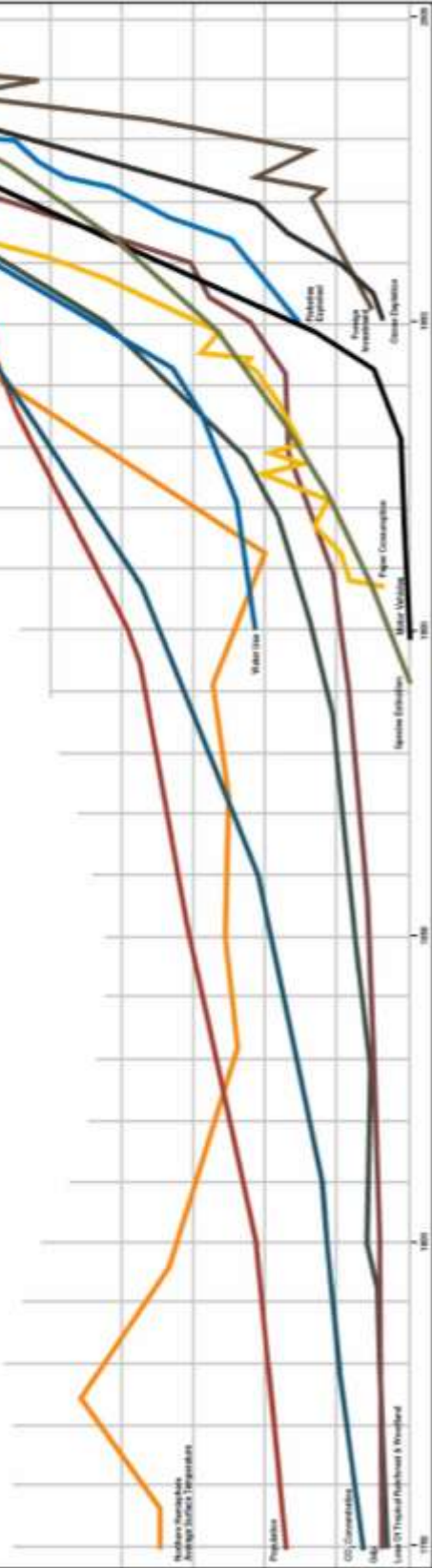


Comments of Corridor-4 design

- 1) Economise in providing pedestrian walkways: make them a part of the flyover structure (Regent Hotel, Mehran Hotel, etc).
- 2) Christian cemetery loop is not possible, as it would desecrate the graves of the minority community. An alternative is to provide for a left-turn at FTC and a protected U-turn on Abbasi Shaheed Road in front of the CSD.
- 3) Provide more pedestrian crossings
- 4) Flyover at City School/Shahheed-e-Millat Road is a cop-out for the city administration (somewhat like the flyovers at Quaidabad and the recently completed elevated bypass on the Gizri Road into DHA.) Instead of tackling the congestion caused by traffic rules violations, illegal parking, thela/khoka encroachments, etc, money that the CDGK does not have is being spent on a flyover (possibly under pressure from the elite City School and PAF).
- 5) Increase width of Shahrah-e-Faisal from 6 lanes to 8 lanes between FTC Intersection and Avari Tower Intersection. Land must be acquired from each side of the road to benefit the city.
- 6) The project is not based on an analysis of an overall and comprehensive traffic management plan for the city of Karachi, but seems to be a piecemeal approach. Proper studies of existing and future traffic, including
 - ✓ turning traffic at intersections,
 - ✓ effects of additional traffic attracted by the signal-free system ("transferred traffic", "induced traffic")
 - ✓ traffic that will be diverted/generated owing to closure of certain crossingshave not been made. Will the alternate routes handle the increased traffic, or are new problems being created in order to address the existing ones?
- 7) Sultan Ahmad Shah Road in KCHSU Commercial Area is almost completely blocked and cannot handle diverted traffic. CDGK will have to remove parking on road and free illegally-converted parking in surrounding buildings.
- 8) The length of the ramp on the Saddar side of the Mehran Hotel flyover seems much longer than that on the Cantt Station side. Why is this?
- 9) The implementation of the SEPA's directives during construction of the overpasses at Regent Plaza and City School was poor. What is the point of this entire exercise?

The hockey stick

- Northern hemisphere average surface temperature
- Loss of tropical rainforest & woodland
- Population
- CO₂ concentration
- GDP
- Water use
- Paper consumption
- Species extinction
- Motor vehicles
- Fisheries exploited
- Foreign investment
- Ozone depletion



CDGK IS SAVING THE ENVIRONMENT THROUGH SUSTAINABLE DEVELOPMENT



**ENVIRONMENT & ALTERNATIVE ENERGY DEPARTMENT
GOVERNMENT OF SINDH**



PUBLIC NOTICE

The Environmental Protection Agency, Sindh hereby notifies that M/s. City District Government Karachi (CDGK) has submitted Environmental Impact Assessment report for Signal Free Corridor-IV at Shahrah-e-Faisal, Karachi. The main objective of the project is to relieve traffic congestion on Shahrah-e-Faisal by construction of eight flyovers. The detail of locations is as under:

1. **Malir No. 15 on Shahrah-e-Faisal, Karachi.**
2. **Malir Halt on Shahrah-e-Faisal, Karachi.**
3. **Jinnah Terminal Signal on Shahrah-e-Faisal, Karachi.**
4. **Tipu Sultan Road on Shahrah-e-Faisal, Karachi.**
5. **Intersection of Shaheed-e-Millat Road and Mehmoodabad near City School PAF Chapter, Karachi.**
6. **Regent Plaza Intersection on Shahrah-e-Faisal, Karachi.**
7. **Hotel Mehran Intersection at Shahrah-e-Faisal, Karachi.**
8. **PIDC House PC Hotel Intersection along Dr. Ziauddin Ahmed Road, Karachi.**

The EIA report identifies potential environmental impacts, and provides mitigation measures to minimize the impacts. The general public, stakeholders, experts of event can pursue / consult the EIA reports in the office of the Director General, Environmental Protection Agency, Sindh, located at: Plot No. ST-2/1, SECTOR-23, KORANGI INDUSTRIAL AREA, KARACHI. The report is also available on the website: www.sindh.gov.pk/environment. A public Hearing will be conducted by the EPA Sindh at 10:00 a.m. on the 15th of June 2010 at EPA Complex Sindh, Karachi in which the proponents will make a presentation about the project. The general public, concerned citizens, civil society organizations and all other stakeholders are requested to attend this public hearing. All others who are interested to offer their comments in writing may communicate the same to Director General, EPA, Sindh on the above mentioned address or through E-mail: at epasindh@gmail.com. (Within 30 days of the publication of the notice)

Director General

Environmental Protection Agency, Sindh