

Key Issues
raised by the documentation of Phase III of the Western High-Speed Diameter Road Construction Project (from Bogatyrsky Prospekt Junction to the junction with the motorway leading to the E-18, “Scandinavia”)

Documentation submitted to the Committee

The following support documentation has been submitted to the Public Environmental Review Committee:

- Volume 7.1.5-343.OOS-1. Environmental Protection. Construction Phase III.
- Volume 14.1, Book 1 5.343.MS-1.1. Consultation documents. Construction Phase III
 - o Minutes of public consultations of 18.12.2006

Documentation not submitted to the Committee

The documentation listed below has not been submitted to the Public Environmental Review Committee. Its lack has seriously hampered objective analysis.

1. Section 1. Baseline data. Volume 1.2. Book 1. Book 2. Geological engineering survey.
2. Section 1. Baseline data. Volume 1.3. Book 1. Book 2. Hydrological engineering survey.
3. Section 1. Baseline data. Volume 1.5. Book 1. Environmental and field studies of the project impact area.
4. Section 1. Baseline data. Volume 1.6. Book 1. Book 2. Town-planning and historical and architectural conditions and constraints.
5. Section 2. Executive summary. Volume 2.1. Book 1. Book 2.
6. Section 3. Master plan and transport system. Volume 3.1 Book 1. Cost analysis.
 1. Transport and economic description of the project impact area. Projected traffic flows.
7. Section 3. Master plan and transport system. Volume 3.2. Book 1. Book 2. Planning solutions. Route plan
8. Section 3. Master plan and transport system. Volume 3.3. Book 1. Book 2. Interchange planning solutions.
9. Section 3. Master plan and transport system. Volume 3.4. Book 1. Book 2. Draft horizontal layout of the proposed section of the Western High-Speed Diameter Road.
10. Section 3. Master plan and transport system. Volume 3.5. Book 1. Book 2. The road environment, traffic management and safety.
11. Section 3. Master plan and transport system. Volume 3.6. Book 1. Book 2. Motorway area landscaping design.
12. Section 4. Architectural design. Volume 4.1. Book 1. Book 2. Site preparation. Rerouting services, engineering infrastructure, systems and facilities.
13. Section 4. Architectural design. Volume 4.2. Book 1. Book 2. Civil design. The road. Justification of project solutions.

14. Section 4. Architectural design. Volume 4.3. Book 1. Book 2. Civil design. Crossings and junctions. Justification of project solutions.
15. Section 6. Land allocation. Volume 6.1. Volume 6.2 Preparation of land release document package.
16. Section 7. Volume 7.1. Environmental protection.
17. Section 8. Volume 8.1 Engineering civil defence measures and emergency response measures.
18. Section 9. Draft building waste management procedures. Volume 9.1. Draft building waste management procedures.
19. Section 13. The introduction of new technologies, equipment, structures and materials. Volume 13.1. Book 1. Book 2. Materials and resources supply to building sites.
20. Section 14. Consultation documents. Volume 14.1. Book 1. Book 2. Consultation documents.
21. Section 16. Demonstration materials. Volume 16.1. Demonstration materials.

Key project issues

Compliance with national legislation

- An Environmental Impact Assessment has not been submitted, in contravention of Section 2.2 of the EIA Regulation. The introduction (p. 33) to Volume 7.1.5-343.OOS-1, Environmental Protection. Construction Phase III, states that the EIA was carried out during the Justification of Investment stage. However, Paragraph 2.2 of the EIA Regulation specifies that an environmental assessment is to be carried out at all stages of preparation of the documentation. This represents a violation of all other EIA principles as well, including the principle of public participation (Paragraph 2.5), of scientific underpinning of EIA documentation (Paragraph 2.6) and of the completeness and reliability of the information (Paragraph 2.7). In addition, the provisions of Paragraph 6.12 of the Russian Ministry of Environment Order No. 539 of 29 December 1995 approving the Guidelines on the Ecological Justification of Business and other Operations, setting out the required content of Ecological Justification documents, have not been complied with.
- No Environmental Impact Assessments of alternative approaches to achieving the objective of the proposed project, including the option of retaining the status quo, have been undertaken. This contravenes Paragraphs 1.6, 2.4, 3.2.1 and 3.2.2 of the EIA Regulation [4].
- The principle of ensuring public participation in the preparation and discussion of the environmental impact assessment of the proposed operations has been breached, including the requirement of the provision of full and reliable information (Paragraphs 2.5 and 2.7 of the EIA Regulation [4]).
- In a number of cases, the information provided has been incomplete or unreliable. For instance, a major shortcoming of the documentation is the virtually total absence of an assessment of the impact of the Western High-Speed Diameter Road on the Yuntolovsky Wildlife Sanctuary buffer zone, an area where building work is being planned. The volume on Environmental Protection does not contain a section dealing with the impact on ground water and measures to ensure its protection during the construction and operation of

the road, or a section assessing the environmental risk resulting from possible accidents.

- Not all the required documents have been presented at the public hearings. Analysis of the minutes and conclusions on the hearings indicates that in their answers to many questions from the public the authors of the documentation and the Client referred to documentation not available for consultation by the public.

Principal identified environmental risks:

- Project implementation could result in changing the hydrological regime of the Yuntolovsky Wildlife Sanctuary in the northern part of the project, and this in turn could change the landscape and lead to the extinction of protected flora and fauna.
- Surface and ground water could be contaminated during the construction and operation of the road, since the effectiveness of the proposed protective measures will depend on the time of the year.

Principal identified risks to human health and quality of life:

- It is likely that leisure opportunities for the residents of the Lake Dolgoye housing estate will be curtailed, as well as those of St. Petersburg's Primorsky District as a whole.
- It can be expected that the maximum permissible noise levels will be exceeded for those living in houses located along the proposed route.

6. Conclusions

The documentation of Phase III of the Western High-Speed Diameter Road construction project (from Bogatyrsky Prospekt Junction to the junction with the motorway leading to the E-18, "Scandinavia"), submitted for public environmental review, gives rise to a number of serious questions relating to environmental risk assessment as well as to the assessment of health and quality of life risks. At the same time, due to the Client's failure to comply with the procedures and principles of environmental impact assessment and its failure to submit the necessary documents for review, final assessment of risks that have been identified, and of their extent and scale, has been significantly hampered.