To the Asian Development Bank

To the European Bank of Reconstruction and Development

To the Prime-minister of Georgia, Mr. Mamuka Bakhtadze

To the Public Defender (Ombudsman) of Georgia, Mrs. Nino Lomjaria

To local and international non-governmental organizations operating in Georgia

To the citizens of Georgia

## Appeal Letter

## From local people from Khada Valley

As known Kvesheti-Kobi road section of the North-South Corridor is planned to carry out through the Khada Valley. There were more than 30 different alternatives to this section of the road, but the Roads Department had somehow chosen that alternative which is passing to our gorge. From the village of Kvesheti to Kobi, on 23 kilometers long road is planned so to build huge bridges and tunnels. The longest of the tunnels will be 9 kilometers long and two 400 meters long bridges.

The project has many different dangers for Khada, while its benefits to the valley are very small. The project is estimated in its own documents as Category A, what means significant negative impacts on the environment: the loss of agricultural lands, water and air pollution, waste large amounts of development, road safety, vibration, noise pollution during construction and operation of the highway, the impact of diverse Cultural Heritage and a unique landscape.

The highway will have a negative impact on local agriculture, but neither the project documents nor the Roads Department pay any attention to it. The road will pass through our lands and the Roads Department is only going to pay for the land on which the highway will be arranged, but even with adequate compensation it is important that we will not be able to produce healthy products. For example, Khando Fruit Warehouse/Factory does not stock fruits produced less than 200 meters from the highway, and we will have production in 10-15 meters from the highway. Also, the proposed compensation is completely unacceptable: 1 square meter – 5.6 GEL. The land is not for sale, the land in which our ancestors were drenched in blood and sweat, and which will take our daily tranquility, clean air, health, and healthy agro products.

Our valley is rich in cultural heritage, though almost all monuments or archaeological materials are unexplored. The authors of the project neither described or studied these monuments, nor planned mitigation measures to avoid or minimize the impacts on cultural sites. Project officials only say that the monuments will have monitors and nothing will be damaged, what we do not believe. Dry stones were used to build a large number of dwellings and monuments in the Valley and during construction or operation of the highway, there will be a large impact on them. According to the project documents, the impacts also indicate that "churches and towers may be damaged during the construction".

Implementation of the project will also affect the environment. During the construction process and during the operation of the highway, when the road becomes overcrowded and the trailers begin to move, the air quality and the amount of debris will significantly deteriorate, while the present state of the valley is completely intact and there are no polluting objects in the valley. The environmental impact assessment itself says that the only sources of noise in the Khada valley are the wind and the tweets.

The Environmental Impact Assessment document states that the project may cause contamination of local water resources, due to poor health monitoring, it is possible to spread diseases to the population, to spread invasion species, to destroy habitats, etc. After the tunneling, 3.6 million cubic meters of hollow rock will be needed to be replaced, which will have additional impacts. Documents mention these sites for the waste landfills: along the river in the village of Kvesheti, Didveli Mountain (on top of Bedoni village) and the huge area to the right of Zakatkari Village. It should be noted that even after many years it will not be possible to use these sites for arable or mowing.

Project officials are trying to convince us that the new road will develop ecotourism when the opposite is actually expected. Damage/destruction to the existing landscape, pollution of air and noise, deprivation of the opportunity to produce healthy agro products will make it impossible to develop sustainable tourism in the valley. We also consider that the untouched environment is more attractive and interesting to travelers, as it is Khada today.

It is also important that the project also contains geological hazards. Some geologists say that construction of the 9km tunnel through Milliona Mountain is dangerous because the area is dormant volcanoes zone and post-volcanic processes are ongoing. Harmful gases may be emitted during

vibration and excavation. All this needs to be studied, but no research has been conducted. Therefore, we fear that the start of tunneling could pose major threats to the entire valley, especially to the Tskere population.

The project will take at least 4 years and around 146 heavy equipment will operate on the construction. 600 people will be employed and temporary camps will be set up. 4 years of such large-scale work and the influx of so many strangers may bring different dangers to the valley. The daily activities of women and the protection of children's safety will be particularly complicated.

It should be emphasized that the action which is completely unacceptable for us was taken by the state - in the first half of July, our traditionally owned lands were registered under the name of the Roads Department with a total area of 845775 m2 (!)¹. Locals were trying registering these lands for years and they were always refused with the reason of being their lands in recreational zone.

To summarize, the following words were spoken by a representative of the Roads Department at the meeting: "Did you think that this road would be for Khada?" Our expectation was to rehabilitate the existing road in the valley, but it turns out that the project does not address this major problem. The project does not meet to the needs of the locals and, on the contrary, involves sacrificing the Khada valley, which we will not allow.

## Therefore, we demand:

- 1. Do not build the Kvesheti-Kobi highway through the Khada Valley and find other alternative;
- 2. Rehabilitate the existing road in Khada Valley, which covers the internal roads of all the villages in Khada;
- 3. Develop a sustainable development strategy for our valley, which will inevitably include conservation and restoration of cultural sites.
- 4. Return to the population the lands seized by the Roads Department, with a total area of 845775 m2 (!).

<sup>&</sup>lt;sup>1</sup> Village Arakhveti - 10 units of lands with total area of 90709 m2, Village Benian-Begoni - 8 units, total area 11104 m2, Village Zakatkari - 18 units, total area 42611 m2, Village lukho - 4 units, total area 13198 m2, Village Mughure - 2 units, total area 5783 m2, Village Rostiani - 5 units, total area 641624 m2, Keshveti - 7 units, total area of 35026 m2, Village Tskere - 3 units, total area 5720 m2.