

**Society and Cultural Heritage Association**  
**Georgian National Committee of the International Council**  
**on Monuments and Sites (ICOMOS Georgia)**  
**The National Trust of Georgia**  
**Georgian National Committee of the Blue Shield**  
**Georgian Incoming Tour Operators Association**

**A p p e a l**

**Kvesheti-Kobi Road Project: Risks for Cultural and Natural Heritage of the Khada Valley**

**April 2021 - TBILISI**

Dear Sirs/Madams,

We would like to draw your attention to our serious concerns over the proposed Kvesheti-Kobi section of the Zhinvali-Larsi road, linking Tbilisi with the Russian frontier. This current and major project is part of the North-South corridor and involves routing a highway through the unique Khada Valley.

As you may know, many letters of protest have been written expressing concerns regarding the project's impact. They cover the threat to valley's vital eco-tourism potential; damage to the local flora and fauna; geological risks associated with an 9 km long tunnel through a former volcanic cone; severe environmental impact on the Khada valley communities; as well as to the Kazbegi National Park (240 m section) through which the road intends to pass.

In this open letter we urgently point to the importance of this 9 km long, high alpine valley containing a number of historic villages, numerous towers, monuments and archaeological artefacts. Without question the cultural resources of the Khada Valley are unique and highly precious to Georgia's cultural fabric. To find such a large quantity of historical monuments so naturally and harmoniously evolved within this agricultural landscape is very significant. But this key part of Georgia's heritage now faces irreversible destruction due to this proposed construction project. We strongly urge you to stop work on this section and find a suitable alternative route.

(See - Annex 1. Open Letter; Annex 2. Heritage at Risk, World Report 2016-2019 on Monuments and Sites in Danger, ICOMOS International Council on Monuments and Sites, pp. 48-51; Annex 3. J. Gvasalia, M. Giorgidze, M. Suramelashvili, L. Churghulia. The Khada Valley, Tbilisi, 1983; Annex 4. Khada Photographs)

## Open Letter

The Government of Georgia has launched a program to upgrade North-South corridor which entails modernization of the Zhinvali-Larsi Road linking Tbilisi to the frontier with Russia. The construction of the most difficult part, i.e. the Kvesheti-Kobi section, is planned across the highly unique Khada Valley.

Most unusually for such a historic valley so close to Tbilisi, Khada still remains almost totally unspoiled or developed. The fact of its remarkable preservation makes it a prime candidate for the status of Protected Area, if not National Park. Some international observers have suggested a UNESCO heritage site. It is both highly scenic – a favorite among hikers – and characterized by a high concentration of archaeological and architectural monuments. This very rare combination makes it unique, especially given its location right beside the modern ski-village of Gudauri, and offers the strong possibility for tourism diversity – as is found in other European ski resorts.

Constructing this trunk road to Russia through Khada valley will end all such opportunities. This vital asset of Georgian cultural heritage will be lost without any hope of retrieval.

Archeological research has shown Khada to be particularly rich in ancient artifacts. Prior analysis has revealed evidence of uninterrupted human habitation from the Eneolithic period. An Early Bronze Age settlement site found in the valley is of particular importance. The road will end all chance of preserving these sites in context.

As one of the primary north-south routes through the High Caucasus, the Khada valley and community is referenced in a number of historical records dating from the Middle Ages onwards (9<sup>th</sup>, 13<sup>th</sup>, 14<sup>th</sup>, 18<sup>th</sup> centuries). It then served as a defensive stronghold protecting and controlling the routes to and from the north. The surviving villages and dozens of settlement sites point to the presence of active communities throughout the Middle Ages. Their achievements include the churches, towers, fortresses, chapels, fortified residences, stone slabs with Asomtavruli (old Georgian alphabet) inscriptions, stone crosses, old cemeteries, and crypts. All have been present there for many hundreds of years.

Particularly notable is the group of 9<sup>th</sup> to 11<sup>th</sup> century architectural sites – crowned by the Korogho architectural complex on the hill overlooking the valley. This listed monument of national importance contains a fortress, a tower with semi-circular back, a crypt and the surviving Church of the Virgin, famous for its superb carved, cornice reliefs depicting the construction process. Across the valley and still standing is the seven-story Iukho tower with its semicircular back – a sturdy example of the Khada specific tower. Additionally there is the distinctive Tsetskhlisjvari complex whose church contains mural fragments and archaic symbols, with a six-story tower and several other edifices. Also notable from this period is Bedoni Kvelatsminda Church, with its ancient stonework, topped with the Tree of Life sculpture.

Because Khada is located only 90 kilometres from Tbilisi and is accessible year-round, the valley has huge educational and tourism (horse-riding, cultural and eco-tourism) potential.

But this will be fatally sabotaged by the new road - that requires the construction of five tunnels, six bridges, three auxiliary roads, numerous technical facilities and landfills for the disposal of construction waste and spoil from the 9 km tunnel. The construction will have a highly adverse impact on such opportunities and the living environment for locals by -

- creating a noisy, fumed, toxic environment in the valley so it is highly unlikely the majority of villagers will want to live there much longer. Noise barriers will not help this.
- breaching international agreements on the protection of historic sites and living communities (Council of Europe - *Framework Convention on the Value of Cultural Heritage for Society* and *The European Landscape Convention*).
- carving through the rust-coloured cliff at the valley end, requiring demolition of the 10<sup>th</sup>-14<sup>th</sup> century chapel standing on its top; removal of its praying niche and mineral water fountain.
- passing less than 50 metres from the *Tevdore's khati* (Tevdore shrine) - a former semi-circular backed tower, built of large stone slab (4<sup>th</sup>-10<sup>th</sup>).
- Radically altering the hillside right next to the historic Tskere settlement and part of this settlement.
- Possibly infringing two active village cemeteries, at Begot Kari and Tskere.
- Damaging the local tradition of ecological products (cheese, honey, mint, various medicinal plants) – due to the fume laden air – along with most remnants of the valley's intangible heritage.
- Threatening the Kviriatskhoveli church complex above Tskere by digging the huge tunnel directly beneath it.
- Construction vibration will speed the decay of the existing ancient buildings most of whose stones have dried joints or dry masonry.
- Breaking Article 36 of the Georgian Law on Cultural Heritage.

## **A RUSHED AND ILLEGAL PREPARATION**

The permit for highway construction through the Khada Valley was issued without proper public review or consultation with the necessary experts. Tourism was almost ignored in the project's final Environmental Impact Assessment (EIA), April 2019, and the valley's cultural history merely skimmed over. The EIA contained a list of only 22 historical sites. Following protests by the local community,

individuals, organizations and companies active in culture and tourism, a subsequent inventory was conducted by the Agency for Monument Protection in late 2020. This revealed a further 155 cultural heritage sites, properties and monuments affected by the project, although still omitted several key sites, like cemeteries - still used and very sensitive to locals. Significantly this survey was carried out only after the project had been approved, money dispersed by the lending banks, and work begun. A clear example how incorrect and rushed procedures have been used, and still are.

Almost certainly the inadequately researched EIA and hurry indicate a concern over legal obstacles generated by the many architectural and archaeological monuments as well as by local protests. These would make the project more money-consuming and extend the construction time. The long-term benefit of the sustainable development of the valley, was passed over in favour of a rapidly constructed and relatively unchallenged new highway.

Justification for such behavior and authorization of the USD 559 million loan by the two international development banks, (the ADB and EBRD) is the apparent economic and environmental need for a new road, cutting out the high Jvari pass. Emphasis was put on shortened driving times, and the loan then sanctioned on the strength of the EIA. But this 1000 plus page document completely ignored some most viable alternative routes. A further indication of rushed and inadequate preparation.

As part of this hurry a series of legal violations have already taken place - like the unlawful construction of the worker accommodation camp near the Naghvarevi Church in June 2020, or the building of a tunnel access road across private land near Rostiantkari – without owners' permission.

Such activity does not bode at all well for the rest of this lengthy construction project, in the same way that a significantly flawed EIA sheds doubts on the whole concept of a Khada valley routing.

A series of violations have created mistrust towards the project and raised questions as to the reasons behind the choosing of the Khada Valley, unique in so many regards, out of over forty alternative corridors identified by project designers. Even without conducting specific studies, it must have been obvious that the project would pose a serious threat to the living environment and cultural and natural heritage of the Khada Valley that is home to several villages with rich history and a huge potential for tourism.

It is also obvious that mitigation measures cannot ensure preservation of the integrity of natural, tangible and intangible heritage resources surviving in the valley, while the significance of the unique cultural landscape of this place goes beyond Georgia and is to be properly safeguarded.

For these and many other reasons we strongly urge you to cease the Kvesheti-Kobi section construction and begin measures to develop an alternative road corridor outside the historic Khada valley.