### Kresna Gorge threatened by Struma Motorway again

### Case file update 2015

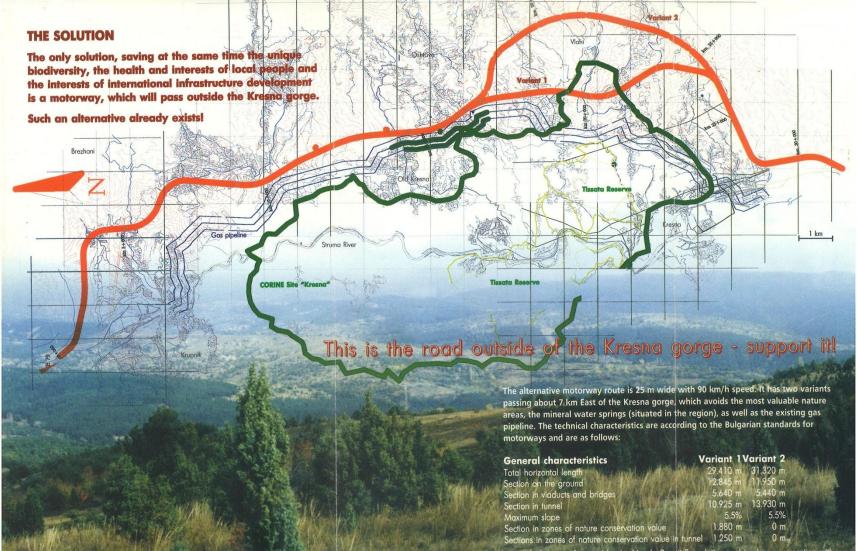
Irina Mateeva

Bulgarian Society for the Protection of Birds





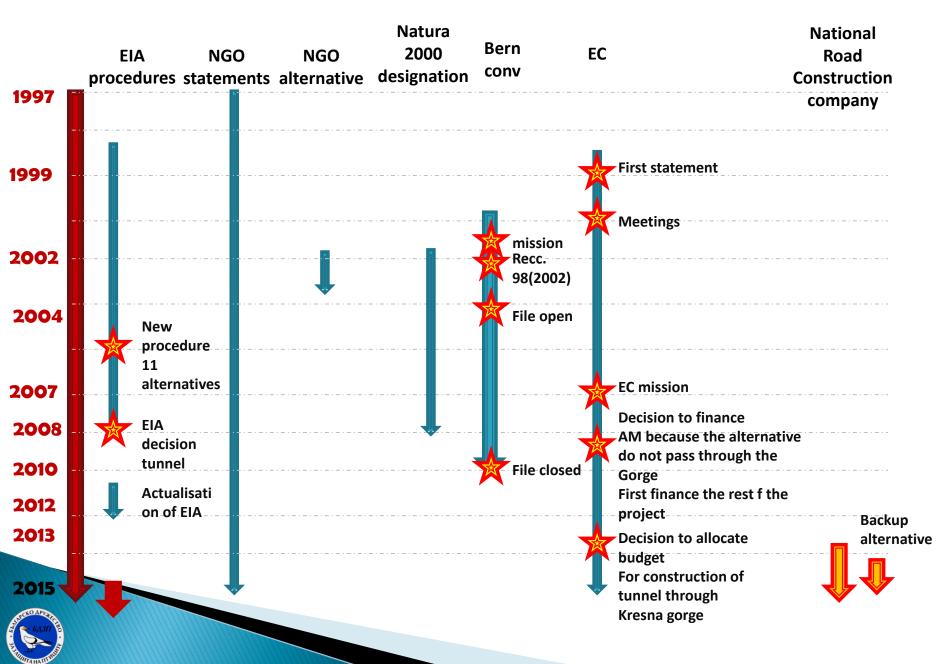
#### NGO alternative of motorway outside Kresna gorge



The alternative is elaborated by "Votan Consultancy" Company under the project of the Bulgarian Society for the Protection of Birds/BirdLife Bulgaria, financed by the Nando Peretti Foundation and in close cooperation w the NGOs Balkani Wildlife Society, ECO-CLUB 2000 and Wilderness Fund.

Photos: Svetaslav Spasov (BSPB), Yardon Hristov (BSPB), Stavan Beshkov (NNHM), Boryana Hrisimova (ECO-CUB 2000), Design: Key Print Express +359 2 736 849

### Efforts to avoid destruction of Kresna gorge



# The decision on how the Struma motorway will pass the Kresna Gorge – EIA decision 2008

## ✓ Tunnel passing the whole gorge on its western slopes must be implemented

✓ The alternatives passing inside the gorge are not acceptable

✓ The alternative east from Kresna gorge is acceptable but with a bit higher impact on biodiversity than the tunnel

#### The motorway is now constructed except the Kresna Gorge section

The motorway is financed by the EU with the clear condition to pass the gorge via long tunnel. BG government confirmed in written to EC that the tunnel will be build in order to receive finances.

## After 18 years the Struma Motorway is planned again to pass the Kresna Gorge



✓ 2014 – request by National Road Agency to MoEW to implement an improvement alternative to the tunnel variant adopted by EIA 2008; MoEW answers that all the new investigations should be searched outside Kresna Gorge and alternatives in the gorge must not be proposed;

 $\checkmark$  2014-2015 strong lobby from the transport sector to implement new alternative through the gorge and abandon the tunnel alternative;

✓ April 2015 – submission of new investment proposal only for Kresna Gorge section to MoEW passing trough the Gorge; MoEW answers that the alternatives in the Gorge are acceptable and initiates new EIA procedure; In November 2015 official statement in newspaper that the motorway will pass in the gorge;

 $\checkmark$  The European Commission is going to finance the project, but since 2014 keeps silence in regard to this case.



#### "New" proposals for Struma Motorway trough the Kresna Gorge



✓ The "tunnel" alternative, which is presented as bad one;

✓ Two alternatives inside the gorge following the existing road in contradiction to rec. 98(2002) and the condition of EC to provide finance for the motorway.

✓ Two eastern alternatives outside the gorge, which is not compatible with the one proposed by NGOs;

✓ One western alternative outside the gorge;

! The INVESTOR stated that only the alternatives inside the gorge have good technical characteristics, so they will only be assessed in detail under the new EIA procedure.



#### The proposed backup alternative inside the Kresna Gorge

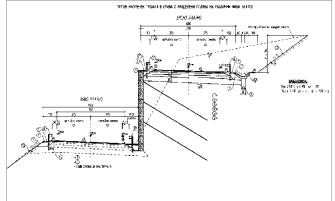


✓ Both alternatives follow the existing road

- ✓ G20 alternative: 36 fortification walls; 13 new viaducts; 13 overpasses; 23 new tunnels + 2 existing ones (in total 6270 km); 6 bridges; 20-29 meters wide;
- ✓ G20 optimized alternative: 29 fortification walls; 8 new viaducts; 14 overpasses; 12 new tunnels + 2 existing ones (in total 3840 km); 24 bridges; 20-29 meters wide;

 $\checkmark$  Different tracks and levels of the two parts of the motorway;

✓ Lack of supporting local road;





#### **Comments on the Governmental report**

✓ Technical aspects:

- ✓ The risks for human safety presented for the tunnel alternative is valid also for the road passing through the gorge, especially seismic risks, rock slides and rock falls
- ✓ The backup alternative follows almost entirely the alternatives inside the gorge which were rejected by the EIA in 2008 because of severe impacts on biodiversity; it is proposed despite the recommendation 98(2002) and the financial conditions of EC
- ✓ The backup alternative started to be studied and elaborated far before conclusions are made that the tunnel alternative is not acceptable (at least several months).

#### ✓ New EIA procedure

✓ out of all reported alternatives in the ToR of the EIA report only the both alternatives inside the gorge are described in details. The other ones (the tunnel and the alternatives outside the gorge are just marked and defined as not-acceptable

The only alternative which was acceptable according to EIA decision from 2008 – the NGO alternative outside the gorge is not included in the assessments of the alternatives
Many of the aspects of assessment set in the Governmental report are not included in the ToR of the EIA report – all the aspects related to biodiversity

#### ✓ NGO involvement

✓ Despite NGOs are represented in the monitoring committee they are not informed about the details represented in the Government reports.

 $\checkmark$  Since one year NGOs ask for the produced reports and analysis and the road agency refuses to give them. Detail on the proposed alternatives are seen for the first time from the Governmental report.



### **Suggestions to Bern Convention**

- Re-open the monitoring of the case and to re-open the case file in order to assist Bulgaria to fulfil its obligations regarding protection of the Kresna gorge and to encourage Bulgarian Government to enforce implementation of Recommendation No 98 (2002).
- Send strong signal to Bulgarian Government to strictly implement Recommendation No 98 (2002) of the 23<sup>th</sup> Standing Committee and to withdraw recent decisions from 2014 of the Bulgarian Government to build the last section of the Struma motorway through the Kresna Gorge by rejecting the chosen in 2008 "Tunnel" alternative and replacing it with a "new" alternative upgrading the existing road to 4–line highway.



#### Thank you!



