

Western High Speed Diameter Central Section PPP project, Russia
Summary of NGO comments¹ and staff responses

<i>Number</i>	<i>Comment</i>	<i>Response</i>
<i>Comments related to the noise impact</i>		
1	Additional measures should be implemented to reduce the level of noise during construction and commissioning of the road (such as installation of the higher noise protection screens). The noise level should be regulated not only inside the residential buildings but also in the surroundings of the residential buildings (courtyards).	Noise impacts have been modelled not only inside the residential buildings but also in courtyards. Additional measures are envisioned and will be implemented. Please refer to the details in the ESIA and the Non Technical Summary page 29 and further of the Russian version
2	Administrative measures should be implemented to mitigate the noise level, such as restrictions of cargo transport flows through the residential areas.	The noise impact assessment takes account of heavy haulage vehicles.
3	How the noise will be reduced during the construction phase (especially during the night hours)?	Night work will be limited according to the ESAP point C 2.5.2 with prohibition of noisy operations from 11pm to 7am in the vicinity of sensitive housing areas
4	The level of vibration and its impact on residential building on Vasilievskiy Island should be assessed in the ESIA documentation.	It is assessed. Please see ESIA page 155 (Russian version). Specific monitoring will be conducted per the recommendations of the ESIA
5	Legal guarantees that construction work will be conducted only between 8am and 10 pm seem not to be achievable because of a) the complexity of structure and the technology, which requires continuous cycles at the concrete pouring stage b) the need to pump water 24 hours a day c) the need to continuously supply concrete, sand, crushed rock and reinforcement to the site d) scheduling delays due to stoppages for low	The ESAP will provide the necessary legal guarantee per special agreement between the Project sponsor and the EBRD

¹ Comments summarised in the table are taken from the comments received at the consultation meeting with NGOs in St Petersburg on 15 November 2011 and via email correspondence received by the EBRD. A list of NGO representatives, which participated in the public consultation process on the WHSD Central Section PPP project is available in Annex 1.

Western High Speed Diameter Central Section PPP project, Russia
Summary of NGO comments¹ and staff responses

	temperatures. Consequently, the agreement between the EBRD and the Government of St Petersburg may be in breach of the Law of St Petersburg on Administrative Liability for Disturbing the Peace and Quiet of Citizens at Night within St Petersburg adopted by the Legislative Assembly of St Petersburg on 24 December 2003. For similar reasons it will not be possible to stop construction work between 15 April and 20 June, which result in a breach of Russian law and international agreements.	
<i>Comments related to the impact on the navigation</i>		
6	The proposed height of main bridge is 60m. St Petersburg is a marine capital, therefore the bridge should allow for large ships to enter the city (largest height of vessels is 62m).	This is a project decision that is beyond the scope of the ESIA. We are aware of consultation between WHSD JSC and the Port of St Petersburg, and assume that the height of the bridge has been agreed with the relevant authorities. The State Principal Expertise accepted the technical configuration of the bridge. It should be noted that there is no height restrictions for ships to approach newly built Morskoy Fasad passenger terminal.
7	Have any studies been conducted regarding the risks of increased ship accidents? Have any consultations been held with the Sea Port Authority in this respect?	The constructive characteristics of objects in the marine environment have been accepted by the relevant regulatory authorities of the Russian Federation, which is sanctioned by the permission to the Project issued by the State Principal Expertise.
<i>Comments related to the construction of temporary small islands</i>		
8	Although the examples of construction of the temporary islands exist, there is little experience in removal of such islands. Where could I read about the proposed technology for removal of the temporary islands and the planned environmental mitigation measures?	The Project company contemplates using a mix of construction techniques. Following a bathometric survey to determine the depth of water in the area of viaduct construction, the decision will be made on a possibility to use barges in areas where the depth of water will allow for it. Yet, there still will be areas where artificial islands have to be built. The current ESAP describes general water quality protection measures. It may be updated once the final techniques are defined.
9	How the water supply and sanitation are planned to be carried out at the temporary islands? It is unlikely that a	If they are indeed constructed (it is now considered that they may not be), nobody will live on these islands for any length of time. Biotoilets will be provided to workers

Western High Speed Diameter Central Section PPP project, Russia
Summary of NGO comments¹ and staff responses

	drainage system will be provided at the temporary islands but this is necessary due to the fact that machinery will be located on the islands.	where necessary (whether on the island itself or on the work site itself on the bridge)
Comments related to the technical and economic issues		
10	On the basis of which studies and documents was the decision taken on the 32-35 metre depth of the piles?	This is a project technical decision, which is not within the scope of the ESIA. It is based on geological and geotechnical investigations, which will need to be confirmed by the building contractor's own geotechnical investigations
11	Has the likelihood of using the WHSD Central Section as transport infrastructure for a freight port on Vasilievskii Island been investigated?	No. There is no project to build a freight port on Vassilievsky that the parties to the WHSD project are aware of. The current port at Morskoy Fasad is intended as a passenger port only
12	WHSD is regarded as the only possible solution to the most vital transport problems of St Petersburg. However, the project is not very effective due to the economic and environmental issues. Alternative models have never been discussed or developed by the City to solve transport issues. The recommendations by the State Ecological Expertise to construct the sections of the WHSD in the following order: Southern section, Central section and Northern section, has not been taken into account.	The project results from a long planning process that has been on-going for about 30 years. The recommendations of the State Ecological Expertise were superseded when the Federal and Regional Governments agreed on the financial structure for the project, with Southern and Northern sections mainly financed from the federal budget and the Central section to be built under a PPP
13	Have there been any consultations with the International Association of Public Transport concerning alternative ways of solving St Petersburg's transport problems?	The EBRD is not specifically aware of such consultation, but the EBRD is satisfied that the project overall participates to a satisfactory solution to St Petersburg urban transport problems. As always with similar projects, it cannot be considered in isolation and needs to be inserted in a more global urban transport strategy. The EBRD may consider supporting the Government of St Petersburg in elaborating such a strategy
14	The EBRD should make an effort to disclose information about the payments from the Government to the Concessionaire under the PPP scheme.	There is no such requirement in any of the EBRD applicable policies. The tender was run by the government of the City of St. Petersburg and key tender evaluation criteria published on the relevant web sites. The structure of Project company revenue can be

**Western High Speed Diameter Central Section PPP project, Russia
Summary of NGO comments¹ and staff responses**

		presented in a brief format during public meetings. The EBRD may approach the parties to the PPP agreement with a formal request for such disclosure, but decision to disclose or not will be at these parties' discretion.
<i>Comments related to the environmental and social issues</i>		
15	A negative visual impact on Elagin Island (view of the sea from the City) is not assessed in the ESIA documentation.	This is a valid point. There is indeed no specific assessment of the visibility of the bridge over the Elaginsky channel from the Elagin island and the park. However, it is not thought that such impacts will be significant as (1) the western tip of the island is at a distance of about 700m from the proposed bridge, (2) the Elaginsky channel is not in a straight line and this will reduce visibility, (3) this bridge is 16m high only (even if the viaduct on the right bank that will connect the bridge to the Primorsky interchange is slightly higher (22m), and (4) at any rate the bridge will be less visible than the new stadium, which will be much higher
16	The road will cross the water reserve. Have any restrictions been planned to protect fish feeding and migration?	Indeed. This issue is well identified in the ESIA (page 79 and further of the Russian version). Measures are proposed to address impacts on fish feeding grounds and migration (see ESAP point C 2.3.2) with a prohibition of underwater works in the most sensitive period from 15 April to 20 June). Also, a change in bridge construction technology is contemplated to avoid the need for temporary islands. This would allow to reduce turbidity further. Lastly all compensation due to the Russian Fisheries Inspection will be paid.
17	Data regarding an impact on migration birds is outdated in the ESIA documentation.	Data on migratory birds originates for the most part from a systematic survey carried out in 1997-1998 by Birdlife International in this area of the Neva delta. The EBRD will approach the Project Partner and JSC WHSD to check whether they could sponsor an update of migratory bird information in the Project area.
18	The creation of temporary workers' settlements could lead to growth in the incidence of tuberculosis in living quarters located in the vicinity of the WHSD Central Section. What guarantees will be given to the residents of Vasilievskii Island that there will be no tuberculosis sufferers among the workforce?	Workers have no reason to have a higher TB prevalence than the general population. Workers will be screened before employment in accordance with the provisions of the Russian labour code. Any workers accommodation will also have to comply with the provisions of the Russian sanpin regulations and with EBRD prescriptions applicable to worker accommodation, hence should not be prone to the development of communicable diseases.

Western High Speed Diameter Central Section PPP project, Russia
Summary of NGO comments¹ and staff responses

Comments related to the stakeholder engagement and public consultation

19	If the EBRD makes decision to finance the project, mechanism of monitoring of the project implementation should be put in place and should include all interested stakeholders, including civil society organisations.	This is a positive suggestion that the EBRD and the private sponsor will consider. This has been done before on similar projects at the initiative of the EBRD and local NGO communities.
20	There are a number of shortcomings in the Russian legislation regarding the information disclosure and public consultation process. NGOs and public does not have a full access to the project documentation on the WHSD project.	These potential gaps are well known of the EBRD and are addressed by ways of (1) disclosure of documentation on the sponsor and the EBRD websites, (2) supplemental meetings at the initiative of both the EBRD (such as the two specific NGO meetings) and the Project sponsor (open houses in December 2011). The consultation and disclosure processes are addressed and described in the Stakeholder Engagement Plan that is (along with other ESIA documents) publicly available at the Project company web site www.nc-highway.ru