

The Director-General
Department of Environment
Ministry of Energy, Science, Technology, Environment & Climate Change.
Level 2, Podium 3, Wisma Sumber Asli
No. 25, Persiaran Perdana, Presint 4 62574 Putrajaya.

(ATTN: ASSESSMENT DIVISION – EIA SECRETARIAT)

Date:

Dear Sir / Madam,

RE: EIA OF THE PENANG ISLAND LINK 1 (PIL1) HIGHWAY PROJECT & SRS PENANG TRANSPORT MASTER PLAN (PTMP)

I list my concerns re the above: **THE PIL1 & PTMP SHOULD BE REJECTED FOR ALL THE FOLLOWING REASONS.**

1. IT IS NOT A LONG TERM SOLUTION TO OUR TRAFFIC PROBLEMS. The Report claims a dramatic time reduction while ignoring its own traffic analysis that full capacity will be reached by 2030. If it starts in 2019 & given a 7 year construction period, it leaves barely 4 years of smooth traffic flow, with RM8 billion spent & back to traffic jams.

2. RISKS OF TUNNELING HAVE NOT BEEN PROPERLY QUANTIFIED. Over 50% of the PIL1 highway is made up of tunnels. The EIA Report identifies the impact from drill-and-blast method for constructing the tunnels as “Medium to High” but has not undertaken a proper Risk Analysis. There are 3 major fault zones & fragile hill slopes involved.

3. THE REPORT HAS NOT EVALUATED THE IMPACT OF TUNNELING ON UNDERGROUND WATER FLOW, This is especially in fault zones where water can escape if exposed from blasting and further weaken the soil & rock structure

4. EFFECTS & CONSEQUENCES OF ‘WORST CASE’ SCENARIOS & RISKS OF MAJOR COST BLOWOUT NOT DISCUSSED. The Report recognizes that tunnels across fault zones are vulnerable to collapse & can trigger mass earth movements causing massive damage to nearby structures. The Kek Lok Si temple & the Air Itam Dam, are both less than 500m from the highway alignment. The 56 year old dam is located 700ft above sea level. Damage to the earth-filled dam with a capacity of 2.5 million cu metres of water would cause a massive loss of life and property. The Report recommends that a safe route be found for tunneling along the fault lines BUT it does not assess **what is to be done IF a safe route CANNOT be found and the project has already started.** Additional costs for realignment are also not discussed

5 NO ADEQUATE PREPARATIONS MADE FOR WORKSITE MANAGEMENT. The Report fails to provide the total volume of rock debris from tunneling a dual 3-lane 10.1 km carriageway. (Estimated- 2.5 mill cu m). The Report fails to explain how the daily movement of 250,000 lorry loads(1-ton lorry)for 3-4 years, will be managed along 3 narrow access roads.

6 THE REPORT DOES NOT ADDRESS THE IMPACT TO AFFECTED COMMUNITIES ADEQUATELY. It fails to address the heavy usage of two popular recreational parks, Youth Park & Taman Jajar, in the route of the elevated highway. Recreational users including children will be subjected to noise levels exceeding 75 dB(A) (recommended maximum is 60 dB(A)) & increased air pollutants. Survey questions are not provided in the Report.

7 NO MITIGATION MEASURES PROVIDED FOR SCHOOLS, BUSINESSES & RESIDENTS DIRECTLY AFFECTED. While the Report recognizes that high noise levels exceeding 70 dB(A) within 20m from the highway will affect residents day and night, it offers NO effective mitigation measures

8. THE REPORT GROSSLY UNDER-REPORTS BASELINE OF GASEOUS POLLUTANTS like nitrous oxides produced by vehicular traffic on the PIL1 highway. Modeling studies make unreasonable assumptions to estimate pollutant levels

9. THE REPORT MAKES UNSUBSTANTIATED CLAIMS ON IMPROVED TRAVEL TIMES. NO TIA (Traffic Impact Assessment) is available for public scrutiny. Yet wild claims that with PIL1 travel times in Seberang Perai will improve by as much as 27% and for the whole state by 29%.?

10 THE REPORT IGNORES CLIMATE CHANGE – NOW A WORLDWIDE REQUIREMENT FOR ASSESSMENTS. The Report uses a model based on historical rainfall records when it is globally established that climate change has dramatically changed rainfall patterns. It erroneously concludes that there will be only minor impacts on soil erosion and flooding

11 THE REPORT CLAIMS THAT THERE ARE NO HERITAGE STRUCTURES AFFECTED This indicates a lack of honesty - the Por Tay Buddhist School, St Nicholas Home, Penang Chinese Girls' High School, Shree Muniswarar Temple, the iconic Penang Hill Railway, Kek Lok Si temple & the Air Itam dam - all over 50 years old with cultural & historical significance.

12 THE REPORT FAILS TO RECOGNIZE THE ADVERSE VISUAL IMPACT of elevated 6-lane highways over green parks and forested hills. PIL1 plans to canalize and straighten rivers, when globally, cities are trying to restore natural river flows.

13. THE REPORT COMPLETELY IGNORES POSSIBLE DISASTERS RESULTING FROM LACK OF ENFORCEMENT. While recommending mitigation measures against adverse impacts & implementation guidelines, the Report does not acknowledge the poor local track record for monitoring & enforcement. Recent examples like the Granito landslide Pg 2017 taking 11 lives indicate concerns of possible negligence & lack of enforcement on compliance to safety measures

14. MAINTENANCE COSTS AND COMPETENCY OF EXISTING INSTITUTIONS Operations & maintenance responsibility raises questions of competency levels & costs involved (taxpayers' money?) to maintain highways with more than half its length of tunnels at high safety standards. (ref collapse of Italian highway bridge Aug 2018 where maintenance was the likely issue) The operational implication of supporting the proposed PIL1 in the Report is a critical issue.

15. _____

Thank you,

..... Name: _____ I/C: _____