

To
The Chairman
West Bengal Pollution Control Board
Paribesh Bhawan
Block LA-10A, Salt Lake Sector-III
Kolkata 700098

13 November 2010

Subject: Protection of environment in ‘Subhas Sarobar’, Kolkata

Dear Sir

This has reference to a meeting on the above subject, arranged by West Bengal Pollution Control Board (WBPCB) and held at Paribesh Bhawan at 4pm on 10 October 2010.

In this connection we would like to submit the following for your kind attention and appropriate action:

Facts and Submission

1. Subhas Sarobar, a lake situated in Eastern part of Kolkata with its adjoining open public space, is presently under the administrative control of Kolkata Improvement Trust (KIT). Since long it has been referred to as the ‘lung of East Kolkata’. The ‘lung’ today, runs the risk of infection owing to two Government Projects.
2. The Government of West Bengal along with a number of individuals and organizations, concerned, and hence active, with environmental issues, had appealed to the Government of India to declare three lakes in West Bengal as ‘**National Lakes**’. Of these Rabindra Sarobar, towards the southern part of the City, has already been categorized as a ‘National Lake’ while very soon Subhas Sarobar too is expected to be declared similarly as a ‘National Lake’. That it has not been declared as yet, might be owing to lack of proper initiative on the part of the State Government.
3. Subhas Sarobar, as per the Outline Development Plan (ODP) of Calcutta Metropolitan Corporation (1986) is marked at serial number 144 under the head ‘park and public space’ in Ward No. 33 and is said to be 396331.22 sq. meters (98 acres) in area. It will be worthwhile to know as to what its present dimension is, 25 years after the said ODP was drafted.
4. Subhas Sarobar, a truly public space, is not just a water reservoir. Its ecosystem comprises of the water with its banks, the surrounding soil with its vegetation – in short the entire biodiversity in and around the water-body.
5. In 2000, the Institute of Wetland Management and Ecological Design (IWMED), a renowned organization, had submitted the Final Report on ‘Monitoring of Environmental Status of Subhas Sarobar, Calcutta and Preparation of Management Action Plan’ to the WBPCB. On the basis of their study concerning the pollution status of Subhas Sarobar, the IWMED submitted a proposal for a management action plan, after a two year long study. It will be highly appreciated if we, and the public, are made aware about this report and the action taken on it by the WBPCB.
6. Strangely enough, while Subhas Sarobar awaits to be declared as a ‘National Lake’, two major Government run ‘Projects’ at Subhas Sarobar are being allowed to cause adverse effects on the ecology of the ecosystem of the Subhas Sarobar Lake thus making it vulnerable to irreversible environmental degradation.

7. The first of the two projects mentioned above is the East-West Metro Corridor Project undertaken by the Kolkata Metro Railway Corporation Ltd. (KMRCL) which has encroached into Subhas Sarobar. Warehouses/godowns have been built, construction related vehicles (like dumpers) are being parked, raw materials are being stacked and piling work undertaken. This proposed 'National Lake', has lost a part of the foot-pathway around it and some trees have been felled for this Project. Whereas it is a fact that an EIA for this East-West Metro Corridor Project has been done in 2006, it is unfortunate that it has not been made public. Though the Project has received sanction, and the work is in progress, the contents of the EMP or the working plan have also not been made public. As per the nature of this project, the changes being brought about are indeed expected to be temporary in nature, but there are reasons to suspect that the managers of this Project are violating the norms which they were expected to follow.
8. Since some old staff quarters of the KIT employees have been pulled down to make space for East-West Metro Corridor Project, a new housing for rehabilitating them is being constructed within the Subhas Sarobar boundary. This is indeed in sharp contrast to what happened to those displaced from the vicinity of Rabindra Sarobar a few years back – those who were rehabilitated 12 kms away at Nonadanga. Though, quite rightly, rehabilitation was included in the Project Proposal, it is highly improbable that constructing such new housing within the Subhas Sarobar premise was mentioned in it. The decision to rehabilitate the displaced by the side of a water body awaiting categorization of a 'National Lake' defies all logic and rationality.
9. The second, and a rather atrocious Project, is the one proposing to set up a 'tourism spot' at the Subhas Sarobar. This commercial project within the proposed 'National Lake' area, in the mould of an amusement park, is a joint venture between the West Bengal Tourism Development Corporation (WBTDC) and Kolkata Improvement Trust (KIT). The 'Beautification' Project proposes to carry out construction at Subhas Sarobar in order to 'provide facilities' like food court, joggers park, open-air theatre, landscaped lake-view strand, large fountains, children's park, garden, parking plaza, adventure water-sports, decks in anglers-zone, entrance plaza, cafeteria and so on. To achieve all this, two Government bodies have already started constructional activities at the Subhas Sarobar, which two other State Government Ministries had deemed fit to be categorized as a 'National Lake'.
10. On 4 March 2010 the foundation stone for this tourism related project was laid down at a function titled '*Naborupey Subhas Sarobar*' attended by two Ministers, the Mayor, a MLA, a Councilor and others. All this fanfare for a 5 crore face-lifting project which did not have any EIA. It was declared that of the six proposed zones work would start immediately on three zones. Trees were felled, land adjoining the proposed 'National Lake' built upon in zamindari style – not bothering for environmental clearance or statutory sanction.
11. In response to a Public Interest Litigation (PIL) filed by some residents of Beliaghata, Hon'ble Chief Justice Jainarayan Patel and Hon'ble Justice Asim Kumar Ray observed on 1 October 2010, "*that any construction activity without compliance of necessary requirements such as obtaining Environment Impact Assessment and without following the provisions of the West Bengal Town and Country (Planning and Development) Act, 1979 shall not be permitted ...*". However despite such an order by

the Hon'ble High Court, constructional activity at the proposed food court is still continuing.

12. We are surprised to note that the WBPCB while issuing direction to both the project proponents regarding abiding meticulously to the regulatory order and so on, nowhere mentions in its order dated 6 October 2010 as to whether the WBTDK-KIT project has an environmental clearance. However it specifically mentions that the East-West Metro Corridor Project had been issued with environmental clearance by the Ministry of Environment on 17 November 2006. With great concern, as an invitee to a meeting with WBPCB on 10 November 2010, we observed that WBPCB issued some cosmetic caution to the project proponents like, 'lack of urinal or problems of water logging', while side stepping serious adverse effects on the ecology of the ecosystem tantamount to environmental degradation of this proposed 'National Lake'. This even after the Hon'ble High Court had stalled all construction work in the absence of environmental clearance.
13. We are also appalled by the total lack of coordination between the different organs of the same Government. It is adhoc-ism at its 'best' and urban planning at its 'worst'.
14. Manmade concrete interference in the name of beautification and development of a natural ambience is a deplorable act on the part of Government bodies. More so, when such commercial ventures are bound to affect the flora and fauna adversely. Senior residents cherish the memories of the police band playing melodious tunes in the bygone era. The 'natural-ness' of the landscape was a treat to enjoy. The committed morning walkers were addicted to the freshness of the earth, the grass, the trees, the water and all forms of life they supported. Proper upkeep of a park or an open public space does not necessarily mean covering everything with stone or concrete structures. Who decides that the only brand of beautification acceptable is one which replaces natural serenity with commercial artificiality?

Our Demands

1. The project to set up a 'tourism spot' at Subhas Sarobar should be abandoned and the area in which construction has been made should be restored
2. An up-to-date status report and management plan should be drawn up on Subhas Sarobar
3. Action should be initiated for monitoring and managing the entire Subhas Sarobar with special emphasis on its biodiversity
4. Initiative should be taken to urge the Central Government so that it declares Subhas Sarobar as a 'National Lake', complete with its ecosystem and biodiversity

Expecting appropriate action initiated at your end.

Thanking you

Yours sincerely

Naba Dutta

General Secretary

Nagarik Mancha

CC: The Chief Law Officer, WBPCB, Paribesh Bhawan, Salt Lake, Kolkata