

**BANK MANAGEMENT RESPONSE TO  
REQUEST FOR INSPECTION PANEL REVIEW OF THE  
INDIA – MUMBAI URBAN TRANSPORT PROJECT  
(IBRD LOAN No. 4665-IN; IDA CREDIT No. 3662-IN)**

Management has reviewed the Request for Inspection of the India – Mumbai Urban Transport Project (IBRD Loan No. 4665-IN; IDA Credit No. 3662-IN), received by the Inspection Panel on June 24, 2004 and registered on June 29, 2004 (RQ04/4). Management has prepared the following response.



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## ABBREVIATIONS AND ACRONYMS

|       |  |
|-------|--|
| CEMP  | Community Environmental Management Plan            |
| CTS   | Comprehensive Transport Study                      |
| EEH   | Eastern Express Highway                            |
| EMCB  | Environmental Management and Capacity Building     |
| FSI   | Floor Space Index                                  |
| GNRs  | Gazi Nagar Requesters                              |
| GoI   | Government of India                                |
| GoM   | Government of the State of Maharashtra             |
| IM    | Implementation Manual                              |
| IMP   | Independent Monitoring Panel                       |
| MCGM  | Municipal Corporation of Greater Mumbai            |
| MHADA | Maharashtra Housing Area and Development Authority |
| MIG   | Middle Income Group                                |
| MMR   | Mumbai Metropolitan Region                         |
| MMRDA | Mumbai Metropolitan Regional Development Authority |
| MUTP  | Mumbai Urban Transport Project (the Project)       |
| NGO   | Non-governmental organization                      |
| NSDF  | National Slum Dwellers Federation                  |
| PAD   | Project Appraisal Document                         |
| PAP   | Project Affected Person                            |
| PIC   | Public Information Centre                          |
| R&R   | Resettlement and Rehabilitation                    |
| RAP   | Resettlement Action Plan                           |
| RIP   | Resettlement Implementation Plan                   |
| RoB   | Road-over-Rail Bridge                              |
| SCLR  | Santa Cruz-Chembur Link Road                       |
| SPARC | Society for Promotion of Area Resources Centers    |
| SRA   | Slum Rehabilitation Authority                      |
| TDR   | Transfer of Development Rights                     |
| USOA  | United Shop Owners Association                     |
| WEH   | Western Express Highway                            |

### Currency Unit as of July 2004

USD 1 = Indian Rupee (INR) 45 / INR = USD 0.022

### Measurements

|                |              |
|----------------|--------------|
| ha             | hectare      |
| km             | kilometer    |
| m              | meter        |
| m <sup>2</sup> | square meter |
| sq. ft.        | square foot  |

## I. INTRODUCTION

1. On June 29, 2004, the Inspection Panel registered a Request for Inspection, IPN Request RQ04/4 (hereafter referred to as “the Request”), concerning the Mumbai Urban Transport Project (hereafter referred to as “MUTP” or “the Project”), financed by Loan No. 4665-IN from the International Bank for Reconstruction and Development (IBRD) and Credit No. 3662-IN from the International Development Association (IDA), together referred to hereafter as “the Bank.”

2. The Request for Inspection was submitted by three associations in Mumbai, India (hereafter referred to as the “Requesters”). The Notice of Registration states that the Requesters submitted the Request on their own behalf and on the behalf of about 350 residents living in an area known as Gazi Nagar in the Kurla West district of Mumbai and who are proposed to be relocated to housing on a permanent resettlement site at Mankhurd due to works on the Santa Cruz-Chembur Link Road (SCLR) under the Project. The Requesters claim that they have not been properly consulted, the proposed resettlement site is too distant and the provisions for resettlement will not achieve restoration of their income. The Mumbai Metropolitan Region Development Authority (MMRDA) and Bank staff are mid-stream in a process to assess and resolve resettlement implementation issues, which were identified during supervision missions in March, early April and mid July 2004. The Resettlement and Rehabilitation (R&R) Policy for the Project provides that “displaced persons are assisted in improving or at least restoring their former living standards, income earning capacity and production levels.” The MMRDA and Bank staff are closely following up on the issues raised during the supervision missions and in the Request, especially with regard to remedial measures that will address the Requesters’ concerns and strengthen resettlement implementation over the life of the Project.

3. This Request from Gazi Nagar is the second related to the Project and the SCLR. The Panel registered a first Request (IPN Request RQ04/3) by a group of shopkeepers, the United Shop Owners Association (USOA), on behalf of 118 persons, on April 29, 2004. Management presented its response to that Request on May 27, 2004. As stated in a Memorandum to the Executive Directors on June 29, 2004, the Panel concluded that while the requests were separate and submitted by two different groups of affected people, in substance they raised related issues and that, for reasons of economy and efficiency, they be processed jointly. Therefore, subject to the Board of Executive Directors’ approval, which was granted on a no-objection basis on July 13, 2004, the Panel recommended that it proceed as follows: (i) ask Management to respond to the Gazi Nagar Request within 21 working days as provided in the Resolution establishing the Panel; and (ii) submit to the Board within 21 working days of receipt of the Management Response, a single Eligibility Report and Recommendation on whether an investigation of the issues raised in either or both Requests is warranted.

4. ***Structure of the Text.*** The document contains the following sections: Section II presents information regarding the Request and Section III provides background to the Project. Specific issues pertinent to the Request are discussed in Section IV. Section V presents a two-pronged approach to resolve the immediate concerns of the Requesters and to improve the resettlement implementation process. Because of the similarity of is-

sues and the need to enhance overall capacity to implement resettlement, Section V contains actions designed to address the needs of both the shopkeepers (first Request<sup>1</sup>) and the Gazi Nagar residents (second Request), as well as overall improvements for the program. A summary of Management's response is provided in Section VI. Annex 1 presents the Requesters' claims, together with Management's detailed responses, in table format. Annex 2 provides information on Bank supervision missions. Annex 3 is a summary of consultations on resettlement. Annex 4 provides environmental information about the resettlement site. Annex 5 contains a selection of relevant photographs and architectural drawings. Annex 6 contains additional correspondence since receipt of the Request.

## II. THE REQUEST

5. The Request for Inspection was submitted by three associations located in Mumbai, India—the Hanuman Welfare Society, the Gazi Nagar Sudhar Samiti and the Jai Hanuman Rahiwasi Sewa Sangh—on their own behalf and on behalf of about 350 residents of Mumbai who claim to be adversely affected by the Project.

6. Attached to the Request are:

- (i) Signatures and addresses of local affected people;
- (ii) Letter of March 30, 2003 from the Hanuman Welfare Society to the MMRDA seeking information about construction of the bridge and the relocation of the Gazi Nagar residents;
- (iii) Various letters in Hindi from the three associations to a number of government agencies, as follows:
  - Letter dated January 2, 2004, requesting allotment of adjacent open space to a trust for resettlement, sent by the three associations to the Minister of State, Housing and Urban Development, Government of the State of Maharashtra (GoM);

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<sup>1</sup> For a detailed discussion of United Shop Owners Association's concerns in the first Request (RQ04/3), see Bank Management Response to Request for Inspection Panel Review submitted May 27, 2004. Subsequent to that Response, the court case of the United Shop Owners Association (petitioners) v/s MMRDA (respondents) has been heard by the High Court of Judicature at Bombay Ordinary Original Civil Jurisdiction. The Court ruled on July 15, 2004 that MMRDA should provide a copy of a new survey to the petitioners, who contended that the earlier survey was not properly conducted, and that, if they have any grievance related to it or to alternative accommodation because of eviction from their present structures, they can place their grievances before the Grievance Redressal Committee established by the R&R Policy. The court accepted the statement by the respondents that persons eligible for rehabilitation will not be evicted from their present site unless and until they have been rehabilitated in the manner provided for in the R&R policy.

- Letter dated January 8, 2004, regarding NGO involvement, flyover linking Kurla East and West, and a request of the Gazi Nagar residents to be resettled in Kurla from the Hanuman Welfare Society and Jai Hanuman Rahivasi Sewa Sangh to the Secretary of the Mumbai Regional Congress Committee;
  - Letter of same date and subject from all three associations to the Chief Minister, GoM;
  - Letter of same date and subject from all three associations to the Minister of State, Urban Development, GoM; and
  - Letter of same date and subject from all three associations, to Minister of Housing Development, GoM;
- (iv) Letters dated May 3, 2004 from the above named three associations to the World Bank, New Delhi, informing it of the grievances;
- (v) Letter of May 19, 2004 from the Bank Task Team Leader to the MUTP Project Director regarding the concerns of the three associations;
- (vi) Letter of May 26, 2004 from the MMRDA to the three associations regarding a May 28, 2004 hearing;
- (vii) Details of the May 28, 2004 hearing provided by the Requesters to the Bank Task Team Leader; and
- (viii) Documentation provided by the Requesters on the poor condition of the new SCLR Public Information Centre (PIC).

7. Further correspondence sent to the Bank in July 2004 is discussed in para. 37 and provided in Annex 6.

8. The Request contains claims that the Panel has stated may constitute violations by the Bank of various provisions of its policies and procedures, including the following:

|                |   |
|----------------|---|
| OP/BP 4.01     | on Environmental Assessment, January 1999;                            |
| OD 4.30        | on Involuntary Resettlement, June 1990; <sup>2</sup>                  |
| OD/OP/BP 13.05 | on Project Supervision, January 1996 and July 2001, respectively; and |
| Disclosure     | World Bank Policy on Disclosure, January 2002.                        |

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<sup>2</sup> The Project Concept Review for the Project took place in 1999; since OP 4.12 applies to projects for which the PCR took place after January 1, 2002, OD 4.30 applies.

### III. PROJECT BACKGROUND

9. **The Project.** The IBRD Loan and IDA Credit for the USD 945 million MUTP were approved by the World Bank Board on June 18, 2002 (GoI funding of USD 403 million; IBRD funding of USD 463 million; IDA funding of USD 79 million). Four legal agreements pertain to the Project: IBRD Loan Agreement, IDA Development Credit Agreement, Maharashtra Project Agreement and the Mumbai Railway Vikas Corporation Project Agreement, all signed August 5, 2002. The Project became effective on November 6, 2002. It is being implemented by the Mumbai Railway Vikas Corporation; Municipal Corporation of Greater Mumbai (MCGM); Bombay Electricity and Suburban Transport Corporation; Maharashtra State Roads Development Corporation; Traffic Police of Mumbai; and MMRDA, on behalf of the GoM and the Borrower, the Government of India (GoI). The MMRDA is the coordinating agency and is responsible for implementation of the R&R component on behalf of all the implementing agencies.

10. The MUTP is a major infrastructure project that entails resettlement of over 120,000 people. The Bank held the Project Concept review in 1999, after spending many years in dialogue with the Borrower. The Project's complexity is dictated by its challenging urban development context (see paras. 15-17 below). Both the Bank and GoI are well aware of the Project's risks as well as the substantial positive outcomes that will ease congestion and improve the living conditions of resettled slum dwellers in Mumbai. This Project could serve as a prototype for other urban development projects in large, congested Indian cities.

11. **Project Objectives.** The development objective of the MUTP is to facilitate urban economic growth and improve the quality of life of the citizens of Mumbai by developing an efficient and sustainable urban transport system, including effective institutions, to meet the needs of users in the Mumbai Metropolitan Region (MMR). See Map 1.

12. **Project Components.** There are three Project components.

- **Component 1. Rail Transport – USD 654.27 million, of which USD 304.90 million financed by IBRD Loan:** The component aims to improve the capacity and performance of the suburban rail system through service efficiency improvements (increasing existing track capacity; converting from direct to alternating current; improving signaling, electrical and telecommunication systems), procurement of new rolling stock and upgrading of existing rolling stock, and expanding network capacity. The component also supports studies and technical assistance, to improve, among other things, Indian Railways capabilities with regard to railway track and rolling stock maintenance, financial management and control systems, railway safety and quality assurance systems.
- **Component 2. Road-based Transport – USD 183.02 million of which USD 150.47 million financed by the IBRD Loan:** This component supports increases in the capacity, efficiency and safety of the road network; better facilities for pedestrians; improvements in the operating efficiency and quality of bus services; and reductions in motor vehicle emission levels. It also strengthens the capacity of the re-



- sponsible agencies to plan, deliver, maintain and operate efficiently road based urban transport infrastructure and services. Subcomponents will: (i) support traffic management programs including Area Traffic Control to optimize the functioning of traffic signals, pedestrian facilities, Station Area Traffic Improvement Schemes and parking control; (ii) increase road network functionality by improving two east-west link roads and eliminating the main road level crossings of railway tracks; (iii) improve the bus system through support of organizational reforms, efficiency measures and procurement of environment- and user-friendly buses; and (iv) strengthen the capacity of transport agencies in Mumbai in traffic management, road maintenance, road safety, communication, and air quality monitoring, including provision of technical assistance for updating of the Comprehensive Transport Study (CTS, 1994), review of User Charges, and developing a Motor Vehicle Emission Control Strategy.
- *Component 3. Resettlement and Rehabilitation – USD 100.08 million of which USD 79 million financed by the IDA Credit:* This component enables the GoM to implement the Resettlement Action Plan (RAP) to resettle those affected by investments under Components 1 and 2. It also provides assistance to those displaced to improve their overall living standards. This component, as described in the Project Appraisal Document (PAD), provides for procurement of housing and shops to resettle those affected by the Project. Other expenses under this component include the acquisition of a limited amount of land for civil works and reconstruction of basic amenities, such as water, electricity, sanitation and community facilities. The Project also provides for the establishment of cooperatives and Community Revolving Funds to assure sustainable rehabilitation of those resettled. The technical assistance under this component includes consultancies for baseline surveys, preparation of Resettlement Implementation Plans (RIPs) for sub-projects, Project supervision and Environmental Management and Capacity Building (EMCB), such as support for supervision of environmental aspects of construction and related environmental training/capacity building support to Project implementing agencies, and training of Project staff/NGOs involved with implementation.

The balance of IBRD/IDA financing is accounted for by refinancing of a Project Preparation Facility advance (USD 3 million) and a front end fee (USD 4.63 million).

13. **Project Status.** The Project has been effective for approximately one and a half years. As of July 22, 2004, 5.9 percent of the IBRD Loan and 38.8 percent of the IDA credit have been disbursed. The Project is scheduled to close on June 30, 2008. Overall, implementation progress, although behind schedule, is currently rated as satisfactory. However, safeguard management performance is rated as unsatisfactory for several reasons. These include delay in completing the post resettlement activities for those already residing in permanent housing, as well as delays by local authorities in completion of off-site infrastructure facilities (water supply, drainage, storm water drainage, access roads), serving the already constructed housing at the resettlement sites. This has resulted in delays in shifting Project Affected Persons from transit housing to permanent housing. Deficiencies in reporting, lack of timely handling of grievances, and inadequate perform-

ance of the Independent Monitoring Panel (IMP) have also contributed to the unsatisfactory rating. Implementation of the Community Environmental Management Plans (CEMPs) needs to be expedited and there are delays in obtaining the statutory clearances under the Coastal Regulation Zone notification for the Borivali-Virar Quadrupling (two pairs of rail lines) railway sub-project.

14. **Bank Supervision.** Since Board approval in June 2002, Bank staff have conducted twelve supervision missions, including seven focused technical missions. These are listed in Annex 2. In addition to Bank supervision, resettlement implementation is monitored through monthly and quarterly progress reports, and minutes of meetings of the IMP. The Bank allocated substantial resources to the supervision budget—USD 200,000 in FY05, USD 181,000 in FY04 and USD 190,000 in FY03—nearly three times the South Asia regional average and double the average for projects in India.

## PROJECT CONTEXT

15. **Importance of the MUTP to India's Urban Development Efforts.** Efficient and adequate urban transport is crucial for future economic development of the MMR. Improved transport increases access to opportunities, stimulates economic activities, and facilitates social interactions. At present, the inadequate transport system constrains economic growth and decreases opportunities for work, especially for the poor, by imposing excessive travel time. Indian cities are the key drivers of the country's economic growth; in this context, poverty reduction is closely linked to the efficiency, safety and reliability of their transport systems to move people and goods throughout the metropolitan area. This Project is the first major undertaking of its type in a large Indian city since the Bombay Urban Transport Project (Loan 1335-IN, carried out in the 1970s).

16. MMR is the largest urban agglomeration in India and one of the world's largest and most crowded. Its population is currently estimated at about 18 million, and is expected to reach 22 million by 2011. Within its 1,467 square km area, population density is currently in excess of 12,000 people per square km. Like most large cities in India, Mumbai is characterized by rapid population growth, much of which is in unplanned, informal settlements. Of the total population, 60 percent live in slums and 1 percent are pavement dwellers. Suburban rail services carry a total of over six million passengers per day. Buses carry over 4.5 million passengers per day, 60 percent of whom transfer to rail. Combined, the rail and bus services carry 88 percent of the region's motorized personal trips.

17. Rail and road network expansion has failed to keep pace with traffic growth; no major capital investment has been made in the last three decades in the city's public transport infrastructure. The inadequate road network coupled with substandard road maintenance has led to increasingly heavy congestion, thereby increasing motor vehicle emissions, a major source (60-70 percent) of air pollution. Motor vehicle pollution affects all income groups; the impact on the poor tends to be more severe because they live in the most congested areas and are more frequently exposed to the hazards. The CTS has recommended public transport and demand management as the preferred options to improve Mumbai's transport.

## RESETTLEMENT UNDER THE PROJECT

18. **Scope of Resettlement in the MUTP.** The R&R component originally provided for resettlement of about 19,200 households and businesses that would be affected by adding or upgrading railways, improving stations, widening key link roads and enhancing pedestrian safety. A key feature of the resettlement program is to accommodate the affected persons in high rise buildings (5-7 stories). The number of affected households and businesses subsequently increased to about 23,000 (approximately 20,000 houses and 3,000 shops, representing approximately 120,000 people) in April 2004 because of changes in the scope of some sub-projects and detailed assessments that updated the preliminary numbers. More than 99 percent of the affected households and businesses had no legal rights to the land they occupied; with the move to their new locations, the households and businesses receive ownership titles and support from cooperative societies. Most of the affected households are currently living in slum conditions, some within arm's length of the railway line in housing constructed with posts and plastic and no facilities, and others in tightly congested neighborhoods with inadequate or absent drainage, sanitation, ventilation and light.

19. **Design of the R&R component.** Resettlement is a crucial factor for successful implementation of the MUTP. The Bank and the GoM spent many years on the design of the R&R component. Through a Policy and Human Resources Development grant (PHRD) of USD 720,000, from the Government of Japan, the Bank provided support for resettlement preparation activities. This was used for baseline surveys, institutional studies, resettlement planning and support of individual consultants/experts. Five Bank staff, including four international resettlement specialists, together with three international and local consultants, contributed to the R&R component. A Delhi-based Bank resettlement specialist has worked on this component for the past nine years and has provided continuity in oversight for resettlement.

20. **An Innovative Approach to Resettlement.** The Project has implemented an innovative approach to resettlement to achieve the objectives of improving transport connectivity and raising the living standards of affected people. This approach entailed the involvement of the private sector and NGOs.

- **Involvement of the Private Sector.** To offset the costs of construction related to resettlement, the GoM developed an innovative financing mechanism to create incentives for the private construction industry to support and partially finance the resettlement program. Private real estate developers who agree to provide buildings at cost for resettlement purposes are given a Transfer of Development Rights (TDRs).<sup>3</sup> This financing mechanism is making the resettlement

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<sup>3</sup> Under the land use regulations in Mumbai, the Government has established a maximum floor space (FSI, floor space index) for each location in the city. Developers cannot exceed these maximum limits when constructing buildings. However, as an incentive for developers to construct low-cost housing, the Government has given the developers the rights to exceed these limits. The TDRs are especially valuable because the right to exceed the legal density can be transferred from slum areas to northern suburb areas and can be

ment program affordable for the Government. TDR programs have been put in place in communities in the US and elsewhere to use the market as a means to protect environmentally sensitive areas, conserve historic sites, promote affordable housing and rehabilitate urban areas. In the Mumbai situation, the benefits of using TDRs include faster land acquisition as well as savings in land acquisition costs and in resettlement costs. The use of TDRs allows resettlement of slum dwellers to in-city locations that would otherwise not be possible, given the extremely high land costs in Mumbai.

- *Involvement of NGOs.* The Government also realized that the involvement of a grassroots organization in resettlement design and implementation could assist in the effort to successfully mobilize a very large number of people to move into suitable new accommodations. Thus, the Government contracted the Society for Promotion of Area Resources Centers (SPARC)<sup>4</sup> and the National Slum Dwellers Federation (NSDF), which work together to implement the resettlement program. Both these NGOs have been active in the affected areas, and transparency and involvement of those affected in identifying and solving resettlement-related problems have been the objective for the overall Project. The role of the Project NGOs includes, but is not limited to, undertaking baseline socio-economic surveys, organizing meetings with Project Affected Persons, explaining the entitlements and Project R&R Policy provisions, preparing the Project Affected Persons for resettlement by grouping them into cooperative societies, neighborhood committees, public distribution centers and savings groups for women, acting as catalysts between Project Affected Persons and the Project authorities, serving as the initial step to redress grievances, assisting the Project Affected Persons in redressing grievances with Project authorities, and providing support for post resettlement activities, such as registration of cooperative societies, and training related to maintaining the buildings and running a Community Revolving Fund during the transition period.

21. ***Resettlement Documents and Processes.*** The R&R Policy, adopted by the GoM on December 12, 2000 for the Project, presents a framework for resettlement and covers all people affected, whether by Bank-financed components or not. The RAP (April 2002), adopted by the GoM and referred to in the legal documents (Section 1.02 (ff) of the Loan Agreement; and Schedule 2, para. 7, of the Maharashtra Project Agreement, both dated August 5, 2002) covers the resettlement requirements under the Project, in accordance

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used for more intensive development. The developer may either use the TDRs to construct and sell the additional space generated from the higher FSI or sell the right to another user.

<sup>4</sup> SPARC is a Mumbai based NGO that was registered as a trust in 1984. Its mission is to create an institution that would work with the organizations of the poor to find ways by which the priorities and strategies devised by those who are poor could produce inclusive solutions to address problems in the cities in India. NSDF was set up by the leaders of slum communities in cities to sharpen and define the voices of the poor to impact urban policy. Leaders of informal settlements, who had defended their settlements against demolitions, sought to move from reactive behavior to designing and executing strategies that work for the poor and for the city. It is currently working in fifty-two cities in nine Indian states.

with GoM's R&R Policy for the Project and OD 4.30. Specific RIPs cover the particular requirements for each of the sub-projects. The agreed Project R&R Policy provides for displaced persons to be "assisted in improving or at least restoring their former living standards, income earning capacity and production levels."

22. During Project preparation, the GoM constituted a task force headed by a former Chief Secretary to the GoM and composed of stakeholder representatives to prepare the Project R&R Policy. Based on its recommendations, the GoM issued a Government Order in March 1997. The Bank requested changes to the Project R&R Policy to bring it in line with OD 4.30 on Involuntary Resettlement; the modified Policy, endorsed by the Bank, was issued through a modifying Government Order in December 2000. An important feature of the Policy is two-stage shifting designed to respond to the tight schedules set by the High Court of the state for relocation of the people residing on the railway tracks. Under the Policy affected persons may be shifted to temporary accommodations for a certain duration and, subsequently, to the permanent resettlement sites. A detailed RAP was prepared based on this Policy framework. Sub-project designs were not finalized by the time of Bank appraisal and their impacts could not be determined. As a result, separate sub-project RIPs and CEMPs are required, prior to Bank approval of corresponding bid documents. RIPs detail the extent of land acquisition, resettlement impacts, proposed resettlement sites, the role of NGOs, specific time schedules and cost estimates. CEMPs, prepared for all the resettlement sub-projects in accordance with OP 4.01, provide the environmental mitigation measures to be adopted during the construction and operation stages of the resettlement sub-projects. Construction-stage mitigation measures are dovetailed with the construction contract; the operation-stage mitigation measures have been prepared in consultation with the NGOs and a sample of the Project Affected Persons.

23. **Implementation of the Resettlement Program.** Implementation of the R&R component has generally proceeded well. Some 4,000 affected families have obtained new housing, formed small savings groups, and are in the process of forming cooperative societies. The cooperative societies are designed to assure sustainability of new housing by taking on responsibility for some management functions and operating Community Revolving Funds to support income-generation activities among vulnerable and needy members of the societies. Another 7,000 families have been shifted to transit housing and are due to be settled in permanent housing in the next six months, commencing in October 2004. This has allowed the Project to start the civil works without waiting for completion of permanent housing, while enabling affected people to gain better access to basic amenities, such as water supply, electricity and sanitation. Communities are being moved as groups to the closest of the available sites, according to a timetable that takes into account the schedules for the civil works under the Project and the construction of new housing and associated infrastructure. In addition, resettlement by community allows people to preserve their social networks, For logistical and social reasons, therefore, choice of resettlement on an individual basis has not been possible.

24. **Grievance Process.** The current grievance process, as set out in the Project R&R Policy and the RIP, gives principal responsibility to the NGO managing the resettlement activity. Problematic issues that cannot be resolved by the NGO are referred to the

MUTP Community Development Officer with support from the Executive Engineer, if required. If a mutually satisfactory outcome is not achieved, issues are referred to a higher management level (Joint Project Director R&R, a Senior Officer from the implementing agency of the corresponding investment sub-project, and a representative of the NGO providing implementation support). The grievance process generally worked effectively during resettlement of the initial 4,000 households, as acknowledged in an independent impact assessment (An Impact Assessment of the Initial Phase of R&R Implementation for the MUTP, November 2003). Nevertheless, supervision missions in April and July 2004 found that the grievance process required strengthening and revamping, (see para. 38) especially in view of a new wave of resettlement to occur from October 2004 onwards. These measures are part of the overall set of actions described in Section V to address Requesters' concerns and enhance resettlement implementation capacity.

25. ***Supervision of Resettlement.*** The R&R component of the Project has been intensively supervised by the Bank (see para. 14 above and Annex 2) through Delhi-based supervision led by the Project co-task team leader, a senior resettlement specialist and an environmental specialist, complemented by assistance from headquarters. The mission aide-memoires and other communications between the Bank and the GoM attest to the active engagement of Bank staff with Project authorities. The April 2004 supervision mission identified and advised MMRDA (confirmed in its follow-up letter of May 12, 2004 to the Chief Secretary) of several issues needing urgent attention and requiring follow-up: (i) swift transfer of those with three years in transit sites to permanent housing units; (ii) establishment of cooperatives and completion of other, post resettlement activities in the permanent housing areas; (iii) strengthening of implementation capacity in MMRDA, especially regarding the role of NGOs; (iv) improved dialogue and a focus on problem-solving with shopkeepers; (v) strengthening of the grievance redress process; and (vi) reconstituting/replacing members of the IMP who have indicated that they could no longer serve for personal reasons. The July 2004 mission discussed these and related issues with MMRDA, Gazi Nagar Requesters, USOA (the party that made the first Request for Investigation to the Inspection Panel) and SPARC. Based on this dialogue, the Bank advised MMRDA and SPARC (confirmed in a follow-up letter dated July 19, 2004 to the MUTP Project Director) of agreed, additional measures and specific ways to carry out previously identified measures to improve implementation. These measures are incorporated in the overall approach for enhancement of resettlement capacity described in Section V.

#### **IV. ISSUES ASSOCIATED WITH THE SANTA CRUZ-CHEMBUR LINK ROAD**

26. ***The Santa Cruz–Chembur Link Road (SCLR)***, with a total length of about 6.45 kms, is a critical link in improving connectivity in the city for the movement of people from east to west and vice-versa (see Maps 1 and 2). Civil works include a major bridge crossing over the Central Railway, approach roads and junction improvements at the Western Express Highway (WEH) and Eastern Express Highway (EEH). The subject of the Request is a small portion (about 300 m) of the SCLR (see Map 2). The embankment

for the approach to the road-over-rail bridge (RoB) over the Central Railway starts in the last 40 m of the Gazi Nagar area. The SCLR is planned in two phases:

- *Phase I*, funded by the Bank, extends from the Mithi River to the EEH (3.45 kms). This road passes through congested commercial and residential areas. Section 1 of Phase I consists of two non-contiguous portions: (i) Mithi River proceeding east 1.25 kms to a location near the Middle Income Group (MIG); and (ii) Maharashtra Housing Area and Development Authority (MHADA) to Amar Mahal Junction (0.6 kms). Section 2 (1.55 kms) of Phase I lies between the two parts of Section 1, within the overall 3.4 km length. The Requesters are located largely in Section 1 and in a small portion of Section 2 (about 40 m) of Phase I.
- *Phase II*, financed with MMRDA's own funds, extends from the WEH to the Mithi River (3 kms). A separate RIP for Phase II is being prepared in compliance with the agreed Project R&R Policy.

27. **Resettlement Implementation Plan.** Following Bank review and no-objection, MMRDA issued the RIP for Phase I in April 2003. The RIP details impacts on affected people and sets out proposed mitigation measures, a budget, timetable, monitoring and evaluation arrangements, etc. The Phase I RIP addresses the resettlement needs of 3,273 households and 668 shops. Details about affected households, including those of the Requesters, are available in the database maintained by MMRDA, as noted in Annex II of the RIP. The affected households will be offered an apartment with floor space of 225 sq. ft., free of cost, with an individual kitchen, bath and toilet facilities, including running, potable water and separately metered, individual electrical connections in each apartment. The Project Affected Persons losing their residences will be given Rs. 20,000 (USD 450) as lump sum grant to be deposited in a fixed account and the interest earned out of this grant will subsidize their maintenance charges and taxes. In addition, the Project Affected Persons will also be provided with transport allowances for shifting their household belongings and either a cash supplement to cover the cost of increased travel distance to work or the option of creating a Community Revolving Fund for economic rehabilitation. During appraisal of the Project, it was agreed that the individual housing societies would make the choice between the cash supplement or the Community Revolving Fund, with deposits made at the rate of Rs. 1,000 per family. For additional information on this issue and those that follow, see also Annex 1.

28. **Mankhurd Site.** The current Requesters are to be relocated to Mankhurd (see Maps 2 and 3). The construction of housing units is in progress. About 2,500 units are complete. However, they are not available for use at this time, since there has been a delay by local authorities in completing off-site infrastructure facilities (water supply, drainage, storm water drainage, access roads and the like), which are expected to be completed by September 30, 2004. Out of the 6,000 units at Mankhurd, the first 2,500 units will be allotted to those who are currently residing in the transit housing. The subsequent 3,500 units will be used for Project Affected Persons affected by other sub-projects including SCLR. Thus, the housing units for the Requesters will be available for use at Mankhurd during October-December, 2004.

29. **Site Selection.** The Mankhurd site was selected based on various proposals received from land owners and developers in response to an open advertisement (see also Annex 1, Item 5). The site selection process utilized a 20-point scoring system in which accessibility to transport (location of site and nature of access) was a key factor. Other factors were infrastructure, site conditions and number of units offered (see also Annex 1, Item 1 for more detail). Among the eleven shortlisted sites evaluated and four sites selected for resettlement from this bidding, the Mankhurd site received the highest score. This 14-ha site is located in M/East ward with a current estimated population of over 400,000 people. The area is predominantly inhabited by people of religious and socio-economic background similar to the communities to which the Requesters belong. The site is located on reclaimed land which is flat, generally sloping towards the creek arms that provide natural drainage to the site. The reclaimed site is adequately raised by fill and is not flood prone (see Map 3). The Mankhurd area is readily accessible to municipal hospitals and dispensaries, schools, markets, garden, playground, cinema theaters, etc. The area is intended to house about 10,000 families (about 50,000 population), including about 6,000 families from MUTP and additional families from the Mumbai Urban Infrastructure Project (not supported by the Bank). The suitability of the Mankhurd site for resettlement is supported by the environmental analysis set out in Annex 4. The suitability of the site would also appear to be supported by the fact that about 400 MUTP Project Affected Persons, who are to be resettled elsewhere, have submitted a petition to the Urban Development Minister requesting that they be relocated instead to the Mankhurd site.

30. **Living Conditions.** The Requesters' living conditions at Mankhurd are expected to be considerably better than they are now (see Annex 5 for comparative photographs). The 225 sq. ft (20.91 m<sup>2</sup>) apartment, compared to a present average size of 130 sq. ft (12.14 m<sup>2</sup>), will be much larger than current habitations. In contrast to the conditions in Gazi Nagar, the new buildings at Mankhurd will be built in accordance with the Development Control Regulations of Greater Mumbai (1991) applicable to building design, construction, and related infrastructure and services, such as water supply, sewerage, site drainage, access roads, elevators, fire fighting, etc. Buildings at Mankhurd are being constructed with concrete and cement, compared to current temporary structures built with inferior materials. Provision of individual water taps as well as separate kitchen, bath and toilet facilities represents a major upgrading compared to common taps and common toilets in the current settlements of the affected people. Physical environmental conditions will also substantially improve, since the resettlement housing has more light and ventilation, lower noise levels, reliable solid waste removal and sanitation, and surrounding open space and recreation area (see Annex 4). A significant benefit of the resettlement is security of tenure, with full legal title to the new apartments. Title is valued at about Rs. 500,000 (about USD 11,000).

31. **Status of SCLR Civil Works.** The civil works contract for Section 1 was signed on September 29, 2003 and awarded for an amount under National Competitive Bidding of USD 7.514 million equivalent. The contract for Section 2 was signed on April 27, 2004 and awarded for an amount of USD 18 million equivalent. The Bank gave a no-objection to the commencement of the works contracts for Section 1 and Section 2 of Phase I with an agreed schedule for implementation of the RIP and related relocation of the affected persons from the construction site to their resettlement site. The contract al-



lows the contractor to work only in sections of the construction site from which affected persons have already been relocated. Currently, the contractor has commenced excavation and abutment works for the Lal Bhadur Shastri (LBS) Road flyover. The original schedule called for affected persons to be relocated by May 2004, but a delay in the availability of completed new resettlement sites has led to a delay in relocation of affected persons and in road construction. Overall progress for civil works on SCLR Section 1 is currently about 2 percent against a scheduled target of 8 percent. At the time of the Bank's no-objection to the Phase I RIP, the delay in availability of resettlement sites was not anticipated.

32. **Road Widening.** The originally agreed and planned road width for the SCLR civil works was 39 m, based on an analysis of economic feasibility, engineering, and resettlement factors. MMRDA now proposes to uniformly widen the right of way to 45.7 m, as specified for roads of this type in the Mumbai Urban Development Plan. The Bank was informed of this proposal to widen both the SCLR and the Jogeswari-Vikroli Link Road during the March 2004 supervision mission. The rationale for the proposed widening at this time is to benefit from the economies of current construction, prevent future encroachments and avoid a future widening that would affect the same people twice. MMRDA has not yet determined how to finance the additional civil works, possibly through their own finances or with Bank financing, subject to availability. The Bank has not given a no-objection to this proposal and has informed MMRDA that, irrespective of the source of financing for the increased scope of civil works, resettlement impacts must be mitigated using the agreed R&R Policy for the Project. Additional resettlement costs could be met from the Bank's credit proceeds, if available; if not available, MMRDA would need to provide financing. An addendum to the Phase I RIP to cover the additional impacts must be prepared by MMRDA.

## V. RESOLVING REQUESTERS' CONCERNS AND IMPROVING RESETTLEMENT IMPLEMENTATION

33. **Issues Identified.** During the Bank's July 2004 mission (following up on the April 2004 mission and subsequent correspondence), Bank staff engaged in a dialogue with MMRDA, SPARC and the two groups of Requesters. Because of the similarity of issues in the two Requests, and the need to enhance overall capacity to implement resettlement, the Bank and MMRDA agreed, as confirmed in a letter of July 19, 2004 to the MUTP Project Director, that MMRDA and SPARC would carry out a series of actions to: (i) resolve immediate issues related to the two Requests from the shopkeepers and Gazi Nagar during July and August 2004; and (ii) improve overall institutional capacity to plan and implement resettlement implementation over the medium term (July to December 2004). Both the April and July missions revealed that mid-course corrections to the resettlement implementation activities (see para. 25 above) were necessary, based on difficulties that were occurring with the timely flow of information to and communication with Requesters, the nature and frequency of consultations and emerging deficiencies in resettlement implementation. These included the following needs: enhanced capacity of the NGO implementation systems, better processes, more explicit protocols and checklists for resettlement activities, a stronger grievance redress mechanism and

for resettlement activities, a stronger grievance redress mechanism and improved, action-oriented reporting and monitoring. Lack of adequate attention to these issues could lead to non-compliance with the Bank's resettlement policy. However, since resettlement of the Requesters has not yet occurred, there is time to remedy their concerns and build on this opportunity to strengthen the resettlement process to help prevent future difficulties.

#### **ACTIONS UNDERWAY AND PLANNED: JULY THROUGH AUGUST 2004**

34. Actions taking place in this period are primarily directed to the two groups of Requesters but also are the beginning of continued improvements to communication and consultation processes and to the grievance redress mechanism, which are part of the medium-term plan. Summaries of the actions agreed to by the Bank, MMRDA and SPARC are provided in Tables 1 and 2 below. These agreements have been confirmed in writing by the MUTP Project Director on July 26, 2004 and by the Director of SPARC on July 27, 2004. Updates on the status of these actions since the July 9, 2004 meeting are provided in the tables; further correspondence with the Requesters is discussed in para. 37 and copies are provided in Annex 6.

35. **Gazi Nagar.** The Gazi Nagar Requesters have expressed their opposition to relocation at Mankhurd (see Annex 1, Items 1 and 5). It became apparent during a meeting on July 9, 2004 with these Requesters that their reluctance seemed to stem from incomplete information about the site and its surroundings, as well as lack of trust in SPARC as a source of information and a means to help resolve their grievances. During the meeting, the following set of actions was agreed upon:

- MMRDA to provide reliable, timely and accurate information to the residents of Gazi Nagar and engage them in ongoing consultations through: (i) regular meetings and visits to Mankhurd by MMRDA's community development officer and SPARC representatives; (ii) periodic meetings with MMRDA until key outstanding issues are resolved; (iii) strengthening the PIC that is located at a site accessible to the affected residents by providing information relevant to affected people and appointing staff who are able to answer their queries and register complaints; and (iv) distributing a brochure in Hindi and Marathi explaining the entitlements of the affected persons and describing the features of the Mankhurd resettlement site.
- MMRDA to organize a visit of the affected Gazi Nagar residents to the Mankhurd resettlement site.
- Grievance redress mechanism to be strengthened (see para. 38 for details).
- MUTP Project Director or Chief of R&R to meet the affected residents after the site visit to assess progress and receive feedback. During this meeting, the MUTP Project Director will hear suggestions from the Project Affected Persons about possible improvements at the Mankhurd resettlement site. If any of the suggested improvements are not considered feasible, MMRDA will provide reasons for not

being able to accommodate them. The MUTP Project Director will again take stock of progress and agree on next steps, if any, by August 31, 2004.

36. ***United Shop Owners Association (First Request).*** Some of the trades practiced by these shopkeepers would require a much larger area than the 225 sq. ft. for which relocating shopkeepers are eligible according to the Resettlement Policy. Nevertheless, it was also recognized that many of the affected shopkeepers (up to 49 out of the 108 shopkeepers) could continue their present business at the new shops constructed at the Mankhurd resettlement site. The Requesters and MMRDA identified a number of options that may be feasible. At a meeting with this group of Requesters on July 9, 2004 (see para. 33 above), the following set of actions was agreed upon, based on the principle agreed to at the meeting that case-by-case choices need to be made:

- MMRDA to organize a visit by the affected shopkeepers to Mankhurd and two alternative sites where shops are available (Anik and Mahul). The purpose of the visits is to help identify the businesses that can be successfully relocated into shops measuring up to 225 sq. ft. at the resettlement sites selected by the affected shopkeepers.
- MMRDA to assess the feasibility of providing additional storage space at Mankhurd to businesses that require more space to store their inventories.
- MMRDA to offer additional space (up to 750 sq. ft.) for purchase by affected shopkeepers as per the Resettlement Policy.
- Based on information about shops that can be relocated suitably to the Mankhurd spaces, MMRDA and the affected shopkeepers to assess the feasibility of using some of the space vacated by partially affected shops.
- The affected shopkeepers to assess the feasibility of presenting a “slum redevelopment scheme” that would also include the space currently occupied by unaffected shops situated behind the affected shops. This would increase the total area available for commercial development, thereby increasing the probability of in-situ resettlement of business that require a larger area. MMRDA officials will guide the architect engaged by the affected shopkeepers to help develop the slum redevelopment scheme proposal. MMRDA officials, the affected shopkeepers and their architect will meet at the earliest possible date to discuss this issue. If considered feasible, the shopkeepers should submit the slum redevelopment scheme proposal by September 30, 2004.
- MUTP Project Director to meet after the site visit with the affected shopkeepers to assess the progress made in identifying and following up on the above resettlement measures. The MUTP Project Director will again take stock of progress and agree on next steps, if any, by August 31, 2004.

37. ***Update Since the July 9, 2004 Meeting.*** There has been an exchange of correspondence by e-mail, letter and telephone since the meeting. Letters between the Re-

requesters and the Bank are included in Annex 6. The chronology, as of July 28, 2004, is as follows:

- July 14, 2004 – The Bank received a letter via its Feedback website, dated July 12, 2004 (see Annex 6) from the Gazi Nagar Requesters describing the first part of the July 9 meeting that the Gazi Nagar Requesters found to be objectionable.
- July 19, 2004 – The Bank replied to this letter (see Annex 6), including information on the full extent of the meeting and reflecting agreements reached, based on the view of the seven Bank staff who attended.
- July 19, 2004 – MMRDA extended invitations to the USOA and to the Gazi Nagar Requesters for site visits to occur on July 21 and July 22, 2004, respectively.
- July 21, 2004 – In a letter to MMRDA, the Gazi Nagar Requesters asserted that they had never agreed to a site visit. In the same letter, they requested that MMRDA provide them with a plan of the Mankhurd site in order to determine for themselves whether claims made by MMRDA about the site were correct. They also invited MMRDA to visit open plots of land at Kurla.
- July 26, 2004 – The Bank received a letter dated July 22, 2004 from the USOA addressed to the Bank, Inspection Panel and MMRDA (see Annex 6) regarding MMRDA's letter of July 19, 2004 and contesting MMRDA's minutes of the July 9, 2004 meeting. The USOA requested plans of available resettlement sites for their shops. (Previously, MMRDA had indicated to the Bank that the shopkeepers had requested the plans in a telephone conversation and that these plans had been provided. The shopkeepers had advised that they would contact MMRDA regarding a suitable date for the field visit, following discussion amongst themselves.)
- July 27, 2004 – The Bank received a letter dated July 23, 2004, from the Gazi Nagar Requesters, addressed to the Bank, Inspection Panel and MMRDA (see Annex 6) regarding MMRDA's letter of July 19, 2004, contesting MMRDA's minutes of the July 9, 2004 meeting, and reiterating their concerns.

By e-mail on July 27, 2004, the MUTP Project Director forwarded a letter of July 26, 2004 confirming the agreements regarding the actions to be undertaken. The MUTP has invited both the Gazi Nagar Requesters and the USOA to another meeting on July 29, 2004 to continue to discuss the matter in detail. The Bank is pursuing further efforts to resolve the situation and avoid its intensification.

#### **MEDIUM-TERM ACTIONS TO ENHANCE OVERALL CAPACITY TO PLAN AND IMPLEMENT RESETTLEMENT**

38. ***Strengthening On-the-Ground Resettlement Implementation.*** As the Project enters a phase where resettlement of people affected by a diverse range of Project related impacts is required, together with continued regular follow up on the substantial resettlement completed so far, SPARC's capacity to undertake this challenging task needs to be

carefully assessed and strengthened. The strong community-mobilization efforts of SPARC that have resulted in successful resettlement of almost 10,000 households needs to be supplemented by improved systems and procedures related to resettlement that are transparent to all stakeholders. All tiers of resettlement staff, from both MMRDA and SPARC, should have a clear understanding of the “due process” that needs to be followed in planning, implementing and monitoring resettlement. The affected people should also be familiar with such due process, and should have clear information on how to access grievance redress mechanisms. MMRDA and the Bank agreed that the following medium-term measures (July-December 2004) would be implemented to introduce systemic improvements in resettlement planning, implementation and follow-up:

- SPARC and MMRDA will improve the functioning of the PIC at the SCLR site by providing additional information, a list of Project Affected Persons, one page description of revamped grievance process, communication of location and hours, and a Mankhurd site profile with maps. The attendant will be appropriately trained.
- Given the diverse range of resettlement impacts that need to be addressed in the forthcoming phases of Project implementation, MMRDA and SPARC will conduct a joint assessment of existing capacity to successfully implement the resettlement program and identify any additional measures that are required to strengthen such capacity. With respect to SPARC, the assessment will focus on: (i) the need for making staffing improvements, especially at the middle tier of implementation; (ii) identification of training needs among staff at all levels; (iii) assessment of the capacity to undertake surveys, prepare RIPs and do regular reporting; and (iv) any required improvements in the systems and procedures related to resettlement planning and implementation, with an emphasis on establishing a transparent “due process” that would be followed in all cases.
- The above assessment will result in the formulation of a plan to address capacity development issues and the revision, if necessary, of SPARC TORs by August 31, 2004.
- Based on the assessment, a detailed organizational chart for resettlement activities will be prepared with a clear description of roles and responsibilities at each level.
- The large number of affected areas and resettlement sites and the increasing diversity of resettlement impacts and proposed resettlement measures necessitates the development of an Implementation Manual (IM) that describes, in detail, the process to be followed in different stages of the resettlement process—planning, implementation and monitoring. The IM will help improve the effectiveness of middle and grass roots level staff by equipping them with clear directions on the appropriate course of action in different situations. The IM will: (i) place special emphasis on systems put in place to promote enhanced information dissemination to Project Affected Persons, regular consultations with them and transparent mechanisms for resolving their grievances; (ii) describe the process to be followed in handling unusual situations which may not be adequately covered in the

Project R&R Policy or in the IM; and (iii) clearly list the “green light” conditions that need to be fulfilled at each resettlement site prior to any relocation of Project Affected Persons to the respective site.<sup>5</sup> The green light conditions relate to issuing identity cards, obtaining occupancy certificates, providing basic services such as water, electricity, health, education and waste management and providing the required moving assistance. MMRDA and SPARC will prepare and distribute the IM by September 30, 2004.

- SPARC’s procedures for reporting to MMRDA will be revised by September 15, 2004. Reporting will consist of “monthly alerts” and a systematic quarterly monitoring report to be submitted by SPARC to MMRDA. MMRDA field staff engaged in resettlement activities should also participate in the preparation of these reports.
- Monthly coordination meetings will be conducted by SPARC, MMRDA and the Slum Rehabilitation Society (another NGO not involved with SCLR). Field staff engaged in resettlement activities along with the NGO project directors will participate in these meetings.
- The Grievance Redress Committees will be revamped by August 31, 2004, and information regarding the revamped system will be disseminated in the affected areas and at the resettlement sites. The objective is to increase their accessibility, effectiveness and timeliness of response. Key aspects of the revamped system include the following: (i) the committee heads of the two grievance committees will be senior officials and will not be associated with MUTP implementation; (ii) the first tier committee will meet twice a month and the second tier committee once a month; (iii) the responsibilities of the two committees will be expanded beyond verification of eligibility to include broader issues; and (iv) business standards for responding to requests from Project Affected Persons will be established.
- The IMP will be reconstituted with revised ToRs by August 31, 2004. The new members of the panel will be in place and the first meeting will be held in September 2004.
- MMRDA and SPARC will prepare and distribute by September 30, 2004 a due process brochure for Project Affected Persons with information on entitlements, consultation, and the grievance process.

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<sup>5</sup> These measures will be complemented by parallel strengthening of the EMCB activity. A review of the organizational capacity of MMRDA and other MUTP implementing agencies has been recently completed. Recommendations include the need to clarify roles and responsibilities within MMRDA; the need for an operations/implementation manual, as highlighted by MMRDA staff in a needs assessment; and the need for coordination among resettlement, environment and engineering staff. The EMCB consultants are preparing an illustrated manual of actions, including “do’s and don’ts,” to keep the surrounding environment at resettlement sites clean and hygienic. A proactive role by MMRDA and SPARC to coordinate this effort with the strengthening of resettlement implementation capacity will promote the necessary adoption and buy-in by communities.

39. ***Strengthening Oversight of Resettlement Implementation.*** To increase the resettlement capacity of MMRDA, additional measures specific to MMRDA will be put in place and completed before October 31, 2004.

- Resettlement staff will be augmented through the addition of two or three Community Development Officers.
- Selection and appointment of the proposed Senior Social Scientist to oversee resettlement implementation will be completed. This is currently in the shortlisting stage.
- The role of a Resettlement Supervision Consultant along the same lines as the Project Management consultant for civil works will be identified and described and such a consultant will be selected.
- Systems for review and follow-up of monitoring reports to be submitted by SPARC will be established.
- Direct involvement of MMRDA in resettlement implementation and monitoring will be developed, including enhanced roles for the MUTP Project Director, the Chief of R&R, Joint Project Director (R&R), and Project Managers (R&R).
- A communications campaign, including brochures, newspaper advertisements and use of a mobile van and the like, will be put in place to disseminate the outcomes and benefits of the resettlement program, and share good practices and lessons learned.

40. ***Evaluating the Effectiveness of the Measures to Enhance Resettlement Capacity.*** An evaluation will be conducted to identify any further corrections or improvements that need to be made of the measures to enhance resettlement capacity. The Resettlement Supervision Consultant will initiate this evaluation by December 31, 2004 and complete it by March 31, 2005.

41. The Bank plans to carry out the next full supervision mission in September 2004, which will follow up in detail on the two Requests and status of the actions noted above. Until that mission takes place, the Bank will be actively monitoring the tight deadlines that have been set for many of these actions.

42. Regular supervision missions take place approximately twice per year. These missions include social, environmental and resettlement specialists. Specific resettlement and environment missions also take place between these missions. Along with its routine supervision missions, the Bank will continue to monitor resettlement implementation through monthly and quarterly progress reports, and the minutes of the IMP, and will undertake special supervision activities as necessary. The Bank's consultant architect will continue to conduct regular monthly reviews with MMRDA on housing construction and provide guidance. EMCB consultants will continue to undertake monthly monitoring of

CEMP implementation. MMRDA's oversight of resettlement will be augmented through the appointments noted above.

43. ***Ongoing Process.*** This Request to the Panel from the three Gazi Nagar associations, along with the first Request from the USOA, both affected by the SCLR improvement, comes at a time when MMRDA and Bank staff are mid-stream in a process to assess and resolve the issues raised during the supervision missions of March and April 2004 and pursued in the July mission. The Project has adequately resolved resettlement issues during its history to date. In light of the immediate and medium-term actions described above, and the communications from Requesters since July 9, 2004, the Bank continues to work actively with MMRDA to resolve the outstanding issues with both groups of Requesters so as to avoid potential, future non-compliance and strengthen the anticipated positive Project outcomes.



Table 1. Key Agreed Dated Actions with MMRDA and the World Bank

|  | ACTION  | BY WHOM            | WHEN      | REMARKS   |
|--|---|--------------------|-----------|---|
| <b>(a) Gazi Nagar Requesters (GNRs) (Second Request)</b> |   |                    |           |   |
| 1  | Field visits arranged to Mankhurd resettlement site to familiarize GNRs about the site conditions and proposed basic amenities  | MMRDA/ SPARC       | 17-Jul-04 | GNRs refused site visit invitation for July 22  |
| 2  | Follow-up meeting chaired by PD with GNRs to hear the suggestions on any shortcoming in the basic amenities and environmental conditions at Mankhurd site   | MMRDA/ SPARC/ GNR  | 22-Jul-04 | Postponed until after site visit. MMRDA has extended invitation for July 29 meeting<br>Periodic meetings to be conducted until issues are resolved  |
| 3  | Feedback from MMRDA on suggestions from Project Affected Persons for any improvements in the site, including reasons for not being able to accommodate some of the suggestions made   | MMRDA              | 14-Aug-04 | Draw a timeframe for implementing the suggestions made  |
| 4  | Taking stock and agreeing next steps to address the concerns of GNRs  | MMRDA              | 31-Aug-04 |   |
| <b>(b) USOA (First Request)</b>                          |   |                    |           |   |
| 5  | Arrange field visits to two alternative sites (Anik and Mahul) and a repeat visit to Mankhurd to enable USOA to make choices  | MMRDA/ SPARC       | 17-Jul-04 | Site visit postponed; USOA to review site plans   |
| 6  | Follow-up meeting chaired by PD with USOA to hear their feedback on the visits to alternatives sites  | MMRDA/ SPARC/ GNR  | 22-Jul-04 | Postponed until after site visit. MMRDA has extended invitation for July 29 meeting<br>Periodic meetings to be conducted until issues are resolved. |
| 7  | Hold discussions with shopkeepers to determine, on a case-by case basis, the option most suited to their particular circumstances.  | MMRDA/ SPARC/ USOA | 25-Aug-04 |   |
| 8  | Taking stock and agreeing next steps to address the concerns of USOA  | MMRDA/ SPARC       | 31-Aug-04 |   |
| 9  | Shopkeepers to prepare and submit a Slum Redevelopment Scheme, if feasible, to the Slum Rehabilitation Authority (SRA) for in-situ-resettlement   | USOA               | 30-Sep-04 | MMRDA will provide the technical guidance, as necessary, for developing the scheme.   |
| <b>(c) Resettlement Implementation Strengthening</b>     |   |                    |           |   |
| 10   | Reconstitute the redress grievance committees and Independent Monitoring Panel (IMP).   | MMRDA              | 31-Aug-04 | Heads of grievances committees should not be associated with project implementation. The first meeting of the IMP will be held in September, 2004.  |
| 11   | Prepare and distribute the "entitlements and due process" brochure  | MMRDA/ SPARC       | 30-Sep-04 |   |
| 12   | Prepare R&R Implementation Manual (IM) with guidance on implementation procedures   | MMRDA /SPARC       | 30-Sep-04 |   |
| 13   | Strengthen MMRDA Capacity to deal with R&R <ul style="list-style-type: none"> <li>• Additional Community Development Officers,</li> <li>• Professional Social Scientist</li> <li>• Resettlement Supervision Consultant</li> <li>• Systems for review and follow-up on NGO reports</li> <li>• Increase oversight by PD/Chief (R&amp;R)</li> <li>• Communication campaign in place and provide a van</li> </ul> | MMRDA              | 31-Oct-04 | Hold monthly coordination meetings with NGOs  |
| 14   | Evaluation of implementation of the improved resettlement system by the Resettlement Supervision Consultant   | MMRDA              | 31-Dec-04 | Review results should be available by March, 2005   |

**Table 2. Key Agreed Dated Actions with SPARC, MMRDA and the World Bank**

|   | <b>ACTION</b>   | <b>BY WHOM</b>  | <b>WHEN</b> |
|---|---|-----------------|-------------|
| 1 | Finalize the composition of Team to work exclusively on MUTP including the outreach workers   | SPARC           | 24-Jul-04   |
| 2 | Improve the functioning of PIC at SCLR site with additional information, list of Project Affected Persons, one page description of revamped grievance process, communication of location and hours of PIC, Mankhurd site profile with maps and better trained attendant | SPARC/<br>MMRDA | 24-Jul-04   |
| 3 | Undertake the assessment of SPARC capacity /systems and agree on the next steps to enhance the capacity and systems   | SPARC/<br>MMRDA | 31-Aug-04   |
| 4 | Revise reporting procedures   | SPARC<br>/MMRDA | 15-Sep-04   |
| 5 | Prepare and distribute entitlement and due process brochure   | SPARC/<br>MMRDA | 30-Sep-04   |
| 6 | Prepare R&R IM with guidance on resettlement implementation procedures  | SPARC/<br>MMRDA | 30-Sep-04   |

## **VI. MANAGEMENT'S RESPONSE**

44. The Gazi Nagar Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1.<sup>6</sup>

45. Management is of the view that the Bank has complied with OP/BP 4.01. Management believes that some issues raised by the Requesters, if uncorrected, have potential to lead to non-compliance with OD 4.30; most of these issues were raised by the Bank supervision missions as broad concerns in March and April 2004, and they are currently the subject of intensive follow up in order to ensure compliance. With respect to OD/OP/BP 13.05, supervision of the Project has been frequent and intensive, as appropriate for this large and complex project. Regarding the Bank's policy on Disclosure of Information, Management is of the view that its requirements have been met. However, Management acknowledges that there have been weaknesses in communication of information to and consultation with Project Affected Persons; these issues are among those which are the subject of intensive follow up. The Bank is continuing to pursue its efforts so that the Requesters' rights and interests are not, nor will be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.

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<sup>6</sup> Specific claims related to the United Shop Owners' Request are detailed in Management's separate and earlier, May 27, 2004 Response to that Request.

## ANNEX 1 CLAIMS AND RESPONSES

| No.                | Claim/Issue  | OD/<br>OP/BP | Response   |
|--------------------|--|--------------|--|
| <b>Environment</b> |  |              |  |
| 1.                 | <p><b>Location.</b> The Requesters claim that their interests were not considered at all in the design of the project and that MMRDA is completely disregarding the rights of the people it is displacing and planning to resettle in an urban area – Mankhurd – which is completely unsuitable.</p> <p>The Requesters note that it has come to their knowledge that they are going to be rehabilitated to Mankhurd, nearly fifteen kms from their current location. They note that areas like Mankhurd, Chembur, etc. are considered among the highest polluted areas in Mumbai and that it is near a dump that is spread across 110 ha, where 4,000 tons of garbage from the city are dumped every day, spreading many diseases such as TB, malaria, asthma, etc. in the nearby areas.</p> <p>The Requesters further note that many huge, open drains pass through this area carrying the city's waste and drainage water to a nearby creek, spreading bad odor in the area.</p> | 4.01         | <p>The suitability of the Mankhurd resettlement site is supported by the environmental analysis set out in Annex 4. As described in para. 30, living conditions at Mankhurd are expected to be considerably better than conditions to which Requesters are currently exposed.</p> <p>Mankhurd was chosen through an open advertisement inviting proposals from land owners and developers. A 20-point rating system was used to evaluate the suitability of the sites. The categories to which merit points were assigned were: (i) distance from the proposed site to the nearest railway station by the existing accessible road; (ii) nature of access, such as a pedestrian, narrow street more or less than 20 feet, access from a proposed or existing vehicular road, etc; (iii) availability of existing basic infrastructure (adequate infrastructure, site within municipal sewerage zone, etc.); (iv) site conditions such as levelled, fenced, etc.; and (v) size of the plot that can accommodate a minimum of 250 standard units of 225 sq. ft. Mankhurd scored the highest number of points among the eleven sites evaluated and also among the four sites selected. Once the sites were selected, consultations were held with the potential Project Affected Persons likely to resettle in those sites to provide information about the site and the proposed designs.</p> <p>As part of the CEMP preparation, environmental baseline information was collected, particularly with respect to air, water, land, and flora/fauna. In addition, following the Request, more information has been collected by MMRDA in order to compare the Mankhurd resettlement site with other sites (see Annex 4). The results do not show that the Mankhurd site is excessively polluted or is at risk of being polluted.</p> <p>The dump referenced by the Requesters is located 1.5 to 2 km distant (depending on relative locations in the landfill and Mankhurd colony) from the resettlement site and is downwind from it. Odor has not been reported to be a problem. There is dense habitation between the resettlement site and the landfill, which is managed by the MCGM. There are two large drains, 8 to 10 m wide, one of which is 30 m from the proposed resettlement site at its nearest point. They carry a mix of storm water, sewage and other waste. There have been no reports of odor from the drains. MCGM is required to clean the drains once every year before the monsoons. There are no industrial activities around the site that produce emissions of any kind.</p> <p>Of the total area, fifteen percent is reserved for recreation, of which a substantial part will be landscaped. This will include green lawns and trees planted along the banks of the drain, which will reduce its visibility from the buildings. Flowering trees with a large canopy when mature will be preferred for planting. A retaining wall will be constructed along the banks of the drain to define the boundary and other actions will be taken to prevent erosion.</p> <p>See also Items 3 and 11.</p> |
| 2.                 | <p><b>Highway Design Alternatives.</b> The Requesters claim that while finalizing the design of the proposed bridge, they were not provided with the opportunity to put</p>  | 4.01         | <p>As discussed with MMRDA and confirmed with their engineering consultants, the Gazi Nagar area would be affected by about 40 m length of approach road on the embankment to the RoB. The top width of the road embankment would be 30 m and the MMRDA proposes to acquire the full Development Plan width of 45 m. No part of any bridge structure falls in</p>  |

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|                     | <p>their suggestions forward, or they would have suggested to the concerned authorities to build the proposed bridge similar to the nature and style of J.J. flyover bridge, which would have significantly reduced the number of Project Affected Persons besides cutting its cost and time to complete.</p> |              | <p>that area. This proposed alignment dates back to 1966 and was part of the Development Plan, showing a width of 30 m increased to 45 m in 1990. Options for alternative alignments were limited; this alignment passes through government lands, presently encroached upon by the slums. The J.J. flyover supports a narrower width of roadway of about 16 m, which is not standard. The SCLR is planned as a minimum six lane divided carriageway; construction based on the design of the J.J. flyover would result in a traffic bottleneck on the SCLR.</p> <p>No specific consultations were conducted to discuss alternatives for alignment or structural design, except consultations for R&amp;R purposes. Public consultations were held as part of the Environmental Assessment of the Project as a whole, wherein all sub-projects proposed in the Project were discussed.</p>   |
| <b>Resettlement</b> |   |              |  |
| 3.                  | <p><b>Consultation.</b> The Requesters claim that their rights to participation and consultation were completely denied and no results obtained in their attempts to raise their concerns.</p>  | 4.30         | <p>As part of conducting the Environmental Assessment during Project preparation in 2001 and 2002, a series of consultations was held. The venue and timing of the consultations were announced in leading newspapers. Representatives of NGOs and Project Affected Persons participated in these consultations, which focused primarily on environment and resettlement issues. The minutes of these meetings are available in the Project files.</p> <p>Consultations on the RAP were held as part of the EA consultation process during 2000-2001. The summary of consultations including the date and venue, target audience, means of communication and nature of records maintained were described in the PAD, page 95. A focused consultation meeting was held with project affected people and NGOs on December 13, 2002 at Mankhurd in the Divisional Engineer's Office to discuss the resettlement aspects. As part of preparation of the RIP, consultations were held with Project Affected Persons affected by the SCLR project at the site during October 2002- February 2003, which are outlined in para 1.9 and 1.10 of RIP for SCLR. The issues discussed were resettlement of Project Affected Persons at Mankhurd, designs and layouts, planning of services, maintenance of facilities and environmental management.</p> <p>Consultations with Project Affected Persons have been held on an ongoing basis by SPARC. Whether the specific Requesters participated in these consultations cannot be documented. A specific meeting was organized by MMRDA on June 9, 2003 at the Mankhurd site to explain the draft layout/plan, building plans, and proposed site amenities. Feedback from Project Affected Persons was incorporated in the final designs. About 125 Project Affected Persons, including about 60 from the SCLR sub-project, participated in this meeting. Several meetings with the SCLR Project Affected Persons, in which the proposed relocation of affected households to the Mankhurd site was discussed, were held during November 2003 and February 2004. These meetings were held with Project Affected Persons along the SCLR by elected representatives to provide information about the Project resettlement arrangements and related issues. Since these were high profile meetings chaired by senior ministers, affected households would typically have been aware of them. The meeting minutes are available in the Project files.</p> <p>In addition, following a letter sent by the Requesters to the Bank expressing concerns about lack of consultation, another meeting was held on May 28, 2004 by MMRDA to explain the progress of construction at the Mankhurd resettlement site, and to discuss the non-feasibility of other sites mentioned by the Requesters, the list of eligible Project Affected Persons,</p> |

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|     |  |              | <p>the details of information available in the PICs, and the issue of identity cards. Twelve representatives from the three Requester associations participated in this meeting.</p> <p>The Bank acknowledges that documentation of the consultation process overall and the outreach process to the Requesters has not been sufficient. The Bank is working with MMRDA to put in place measures to achieve better outreach, communicate with Project Affected Persons more effectively and strengthen the role of SPARC and supervision by MMRDA in resettlement implementation. See Section V of the main text.</p>  |
| 4.  | <p><b>Income Restoration.</b> They claim that significant damage would occur due to failure to provide income restoration, and that it would destroy their livelihoods and productive sources and would disperse their social and economic network and kin groups.</p>   |              | <p>The Project R&amp;R Policy provides that “displaced persons are assisted in improving or at least restoring their former living standards, income earning capacity and production levels.” The impact on Gazi Nagar residents is chiefly loss of housing and not loss of jobs or sources of income. In the case of increased distance to the work place from the resettlement site, the Project R&amp;R Policy provides for a payment equivalent to twelve quarterly rail passes. There may be some people losing site-specific opportunities for supplemental income, which will likely be replaced by similar opportunities in the Mankhurd resettlement area, given that it is being constructed as an integrated township and once completed will house about 10,000 families.</p> <p>The Mankhurd site is located in M/East ward, which has a population of more than 400,000 and a large number of thriving commercial enterprises. The resettlement site is very well connected through road and rail transport (the Mankhurd railway station is 500 m from the resettlement site and there is a network of roads around the site). Thus, the Project Affected Persons will have significant opportunities to supplement their incomes at the Mankhurd site also.</p> <p>Since all SCLR Project Affected Persons are proposed to be resettled at the Mankhurd location, their social and economic network and kin groups will be largely retained in the new location.</p>   |
| 5.  | <p><b>Resettlement Site Alternatives.</b> The Requesters state that there is ample open space available in the nearby vicinity such as Premier colony area, New Mill area, Swadeshi Mill area, Bandra-Kurla Complex area and being the nearest open space available, they firmly believe that it is a great failure on the part of the state government as well as of the World Bank that no proper space was allocated in these areas for the convenient and suitable relocation of the Requesters.</p> <p>In Attachment 7 to the Request, the Requesters asked MMRDA why they had not been consulted during all stages of planning associated with resettlement and rehabilitation. The Requesters felt that they should have been allotted a vacant plot of land, measuring about 23,000 sq. ft., adjacent to</p> | 4.30         | <p>A sub-group was formed in MMRDA with representatives from Government and NGOs to identify various available sites for resettlement. Three options evolved out of this process. In Option A, six feasible sites were selected out of a number of sites initially identified. These sites were procured based on transfer from other government departments or using TDRs from land owners. Availability of infrastructure, social services and access to employment opportunity, as well as proximity to the areas from which people were being displaced were taken into consideration in finalizing these sites. Under Option B, four large sites were procured from developers and land owners, through an open advertisement, using TDRs for both land and buildings. The resettlement sites were selected by inviting proposals from land owners and developers through an open advertisement and evaluating them based on the rating system explained in Item 1 above. Finally, under Option C, 4,000 readily available housing units were purchased from Maharashtra Housing and Area Development Authority, primarily to respond to the time-bound High Court Order to resettle the people along the railway tracks in 2000-2001. Proximity to the existing location of displaced persons was considered in the purchase of these housing units.</p> <p>In all, 20,000 housing units will be required for the Project. The details of allotment of housing units for Project Affected Persons of different sub-projects at various sites is furnished in Attachment 1 to this Annex.</p> <p>The particular sites mentioned by the Requesters were also considered by the Project authorities and found not to be feasible. For the New Mill,</p> |

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|                    | the Gazi Nagar area, which has now been gifted to the family trust of the local MLA and minister for a low price of Rs. 1.5 million.  |              | <p>Swadeshi Mill and Premier colony areas, there are restrictions on using the lands of closed factories, which prevent their use for slum rehabilitation schemes. The Bandra-Kurla Complex area is earmarked for an international financial and business center and is not appropriate for resettlement housing. The vacant government land referenced by the Requesters in Attachment 7 to the Request is reserved for school construction in the Urban Development Plan. Accordingly the Government has allotted the site to a trust for the construction of a school. Thus, the site is not available for resettlement purposes.</p> <p>Because of the lack of availability of resettlement site options, there was limited opportunity for prior consultations with the Project Affected Persons on sites that could be offered for resettlement. The sites selected were described in the RAP, which was disclosed and discussed with the Project Affected Persons during Project preparation in add year. As part of preparation of the RIP for SCLR, the suitability of the resettlement sites and the process and criteria followed for their selection was explained to the Project Affected Persons during October-December 2002. Also, the Project Affected Persons were consulted on the draft layouts and plans of the resettlement sites and suitable changes were incorporated based on their feedback.</p> |
| 6.                 | <p><b>Building Construction and Maintenance Charges.</b> In Attachment 4 to the Request, the Requesters express concern about the quality of the foundations and construction of the buildings with regard to the effects of the salty breeze and climate. They note that there are no proper gaps between the buildings. Finally, they state that they were not informed of the maintenance charges and do not know whether they can afford to pay them.</p> |              | <p>Construction of resettlement housing units and shops is governed by the provisions of the Development Control Regulation of Greater Mumbai, as applicable for slum redevelopment schemes. All the schemes require statutory clearances from the SRA. In case of Mankhurd, the designs and layouts were prepared by the contractor's consultants, reviewed by the Project Management Consultants (PMC) of MMRDA and then approved by SRA. The Mankhurd buildings also were reviewed independently by the Indian Institution of Technology (IIT) and suggestions from IIT were incorporated into the final designs approved by SRA. The PMC is responsible for ensuring the quality of construction as per the drawings and approvals. The gaps between the buildings are in accordance with the provisions applicable to SRA schemes.</p> <p>As regards maintenance charges, the project will contribute about Rs. 20,000 (USD 450) as a one-time grant, which will be placed in a fixed account, the interest on which will be used to subsidize the maintenance charges and taxes. It is possible that this information may not have been sufficiently communicated to the Requesters. See Section V of the main text concerning the need to provide better information.</p>  |
| <b>Supervision</b> |   |              |   |
| 7.                 | <p><b>Supervision of Resettlement.</b> The Requesters claim that the Bank has failed to supervise the resettlement plan with respect to their livelihoods, traveling distance, education of children and their admissions in respective medium schools, destruction of the Requesters' source of income, and their social and economic network and infrastructure.</p>  | <b>13.05</b> | <p>The supervision of resettlement has been regular and intensive. In two years since the Project was approved by the Bank, it was supervised twelve times; the resettlement specialist participated in eight of these supervision missions.</p> <p><i>Travel Distance.</i> While preparing the Project R&amp;R Policy, the increase in travel distance to the job from a new resettlement site was taken into consideration. The Policy offers a one time cash supplement equivalent to twelve quarterly rail passes for the increased distance.</p> <p><i>Education of Children.</i> As part of NGO services, the Project Affected Persons will be assisted in the new locations to secure admissions to the nearby schools and provided with guidance about children's education. One 225 sq.ft space is provided for every 100 households for pre-school purposes (Balwadi). Further, in accordance with the Development Control Regulations of Greater Mumbai, space is reserved in the layout for</p>   |

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|     |  |              | <p>schools and other educational institutions.</p> <p><i>Source of Income.</i> The Project provides for a Community Revolving Fund (in lieu of the transport allowance) to be operated by the Project Affected Persons with assistance from NGOs to offer help to vulnerable groups through credits/loans for self employment to supplement family incomes. Should some Project Affected Persons lose their livelihoods permanently, the Project will offer a one-time cash supplement equivalent to one year's income during the transition period to allow those affected to search for alternative livelihood opportunities.</p> <p><i>Social and Economic Network.</i> In order to ensure maintenance of the social and economic network, all concerned Project Affected Persons from a particular area are resettled in one location to enable them to retain their social fabric. The Policy also provides a choice to the remaining population, if their proportion is less than 20 percent, either to resettle along with the affected persons or to continue in the old location.</p> <p><i>Infrastructure.</i> The sites were selected based on criteria that included the availability of infrastructure. The resettlement sites are provided with infrastructure facilities and open spaces in accordance with the Development Control Regulations of Greater Mumbai. All the required statutory clearances are obtained from the SRA and MCGM.</p>   |
| 8.  | <p><b>Consultation and Grievance Procedure.</b> The Requesters note that they have informed the Government of Maharashtra as well as Union Government of India including their instrumentalities through various written letters about their grievances and violation of Bank policies. They have also put their views and suggestions regarding their suitable and convenient relocation in the nearby area to resolve the various problems. However, they note that no response has been obtained from any authority to date.</p> <p>The Requesters state that they have already complained to the World Bank's New Delhi office stating their grievances and the violation and omission by the World Bank following its policies. But, in response, the Bank failed to provide them with any satisfactory reply regarding how and in what manner the policies of the World Bank have been followed.</p> |              | <p>The Requesters did not use the grievance mechanism available under the Project, possibly because they were insufficiently informed about it. The letters they wrote to the GoM and to the GoI were not received by MMRDA. The Bank acknowledges that consultations as well as communication of the grievance procedures have likely not been adequate and that the grievance mechanism itself needs revamping. See Section V of the main text for additional information on actions to address these concerns.</p> <p>The Bank's New Delhi Office received a letter dated May 3, 2004 from the three associations submitting the Request, on May 14, 2004; this letter was forwarded to MMRDA with a copy to the Requesters asking MMRDA to discuss the issues with the Requesters. Accordingly, a meeting was held on May 28, 2004 to discuss the issues and offer clarification on the Requesters' inquiries. A subsequent letter from the Requesters dated June 2, 2004 was received describing an unsatisfactory outcome of the meeting. Subsequently, on July 9, 2004, a constructive meeting was held among the Requesters, MMRDA and the Bank and a number of specific next steps were agreed upon to address the concerns of the Requesters, as described in Section V of the main text. On July 12, 2004, the Bank received another letter from the Requesters describing the first part of the July 9 meeting that the Requesters found to be objectionable, but this letter did not describe the second half of the meeting in which agreements were reached. The Bank replied to this letter on July 19, 2004. (See Annex 6). The copies of minutes of these meeting are available in the Project files.</p> <p>The proposed relocation of the Requesters to the Mankhurd resettlement site does not conflict with any of the World Bank's policies and the resettlement will be carried out according to the Project R&amp;R Policy approved by the Bank.</p> |

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| 9.                               | <p><b>Photographs for Identity Cards.</b> In Attachment 7 to the Gazi Nagar Request, containing the Requesters' account of their meeting with MMRDA on May 28, 2004, the Requesters note that SPARC required Project Affected Persons to pay Rs. 25 per family for photographs to be used for identity cards without providing any receipt for the same, and otherwise threatening that families would be disqualified for alternate accommodation. They noted that 20,000 such photographs were to be taken, amounting to Rs. 500,000.</p> |              | <p>During a meeting with the Requesters on July 9, 2004, MMRDA clarified that this practice would not continue and that the Project would cover the costs of the photographs; SPARC therefore will no longer need to recoup these costs from Project Affected Persons. No earlier problems had been noted on this issue.</p>  |
| 10.                              | <p><b>PIC.</b> The Requesters have also informed the World Bank about the poor condition of the public information centre opened at the instance of the World Bank. Whenever they visited it, they always found it vacant, with no attendant present to provide any sort of information</p>   |              | <p>The July supervision team visited the PIC on July 9, 2004 and reviewed the information available. The PIC is now manned, a register is kept and it is open Monday to Saturday from 10 am to 5 pm.</p> <p>The Bank agrees that certain improvements to the PIC are necessary. Based on the discussions with MMRDA and SPARC, the PIC is proposed to be significantly strengthened through: placement of more relevant information, such as lists of Project Affected Persons, description of the grievance process and better information about the Mankhurd site; and through training of the attendant to enable him/her to answer queries made by the Requesters and others. See Section V of the main text.</p>   |
| <b>Disclosure of Information</b> |   |              |   |
| 11.                              | <p>Due to negligence by the Bank in disclosure of information and denial of the Requesters' rights to participation and consultation, the Requesters were not able to put forth their suggestions in the interest of the affected public at large to be resettled in the nearby area in accordance with the criteria of the state government to rehabilitate Project Affected Persons to the nearest possible open plots of land.</p>   | <b>17.50</b> | <p>The draft RAP was first disclosed in country on October 16, 2001 and in the Bank's Infoshop on November 9, 2001; an updated draft RAP was again disclosed on February 22, 2002, before the appraisal mission. The draft RAP was replaced with the final RAP in country on April 4, 2002 and in the Infoshop on April 30, 2002. The RAP was also disclosed in the PIC of the Bank's New Delhi Office. It was disclosed by the MMRDA locally at the PICs at MMRDA in Bandra (East) and Mankhurd. The executive summaries are also available in local languages (Hindi and Marathi). Copies of the RIP (April 2003) for the SCLR were disclosed by MMRDA in the then existing PIC offices in April 2003. The executive summary of the RIP was placed on MMRDA's web site under its "What is new" section (<a href="http://www.mmrdamumbai.org">www.mmrdamumbai.org</a>).</p> <p>The Mankhurd resettlement site fully meets the criteria for site selection prescribed under the Project R&amp;R Policy. Of all the available potential resettlement sites, Mankhurd is the shortest distance from the current location of the Requesters. The distance between Gazi Nagar and Mankhurd, once the SCLR currently under construction is completed, will be less than 8 kms. As part of consultations in October-December 2002, while preparing the RIP, the process to be followed in allotment of various available sites for Project Affected Persons affected by different sub-projects, including Mankhurd under the SCLR, was fully explained to the Project Affected Persons.</p> <p>As noted in Item 3 above, there were consultations, including the meeting on June 9, 2003 where 60 Project Affected Persons from SCLR attended, but it cannot be verified whether the specific Requesters were properly informed of this opportunity to voice their concerns or if they attended. However, in the meeting held on May 28, 2004 in which the Requesters</p> |



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|     |             |              | <p>participated, issues related to their resettlement, including the allotment of Mankhurd resettlement sites and the non-feasibility of allocating open spaces at other locations, were explained.</p> <p>As stated earlier and in Section V of the main text, further improvements will be made in communication of information to, and consultation with Project Affected Persons.</p> |

**MUMBAI URBAN TRANSPORT PROJECT  
PLAN FOR ALLOTMENT OF HOUSING UNITS TO REMAINING AFFECTED HOUSEHOLDS\***

| No.          | Resettlement Site                                       | No. of Housing Units under Construction | Sub – Project  | No. of Units Proposed to be Allotted |
|--------------|---|---|--|--------------------------------------|
| 1.           | Majas Plot at Jogeswari                                 | 983**                                   | Jogeshwari-Vikroli Link Road –Phase I                                  | 731                                  |
|              |   |   | Borivali-Virar Quadrupling rail Project                                | 245                                  |
| 2.           | Ajgaonkar Plot at Jogeswari                             | 1032                                    | ROB at Jogeswari (South)   | 600                                  |
|              |   |   | 5 <sup>th</sup> line between Santacruz-Borivali                        | 252                                  |
|              |   |   | Optimization WR  | 180                                  |
| 3.           | Nirlon & National Standard Engineering Plot at Goregaon | 476                                     | ROB at Jogeswari (North)   | 316                                  |
|              |   |   | 5 <sup>th</sup> line between Santacruz-Borivali                        | 28                                   |
|              |   |   | Optimization WR  | 132                                  |
| 4.           | Kanjur Marg   | 1442                                    | Project Affected Persons residing at Transit Housing at Kanjur Marg    | 824                                  |
|              |   |   | Optimization CR – Thane-Kalyan   | 450                                  |
|              |   |   | ROB at Vikhroli  | 3                                    |
|              |   |   | JVLR – II  | 165                                  |
| 5.           | Ghatkopar   | 299                                     | 5th and 6th Kurla-Thane (private property owners/tenants)              | 122                                  |
|              |   |   | 5 <sup>th</sup> & 6th line Kurla-Thane                                 | 177                                  |
| 6.           | Mankhurd (S.V. Patel site)                              | 5868                                    | Project Affected Persons residing in Transit Housing at Mankhurd       | 1528                                 |
|              |   |   | Project Affected Persons residing in Transit Housing at Turbhe Mandale | 836                                  |
|              |   |   | 5 <sup>th</sup> & 6th line Kurla-Thane                                 | 458                                  |
|              |   |   | SCLR – Phase I   | 2805                                 |
|              |   |   | SCLR – Phase II  | 241                                  |
| 7.           | Anik I(Runwal Plot)                                     | 1562                                    | Project Affected Persons residing in Transit Housing at Wadala         | 1562                                 |
| 8.           | Anik II(Rockline plot)                                  | 1734                                    | Project Affected Persons residing in Transit Housing at Wadala         | 1734                                 |
| 9.           | Mahul (Videocon plot)                                   | 2620***                                 | Project Affected Persons residing in Transit Housing at Wadala         | 232                                  |
|              |   |   | 5 <sup>th</sup> & 6th line Kurla-Thane                                 | 358                                  |
|              |   |   | Optimization CR – Thane-Kalyan   | 279                                  |
|              |   |   | Optimization on Harbour Line   | 831                                  |
|              |   |   | Optimization of CR   | 810                                  |
|              |   |   | Optimization of WR   | 187                                  |
| <b>Total</b> |   | <b>16016</b>                            |  | <b>16086</b>                         |

\* 4,000 households affected by 5<sup>th</sup> and 6<sup>th</sup> Kurla-Thane, Borivali-Virar Quadrupling rail Project , 5<sup>th</sup> line between Santacruz-Borivali and Optimization projects of Central, Western and Harbour lines were already resettled at permanent houses at Antop Hill, Dharavi and Mankhurd.

\*\* Surplus of 7 units.

\*\*\* Shortall of 77 units.

**ANNEX 2  
MUTP BANK SUPERVISION MISSIONS**

| <b>Date of Visits</b>   | <b>Key Members of the Team</b>  |
|---|---|
| August 19 to 30, 2002<br>1 <sup>st</sup> supervision mission                  | <ul style="list-style-type: none"> <li>• Co-Task Team Leader (Sr. Transport Specialist)</li> <li>• Highway Engineer</li> <li>• Sr. Social Development/Resettlement Specialist</li> <li>• Environmental Specialist</li> <li>• Consultant Railway Specialist</li> </ul>   |
| November 13 to 23, 2002<br>2 <sup>nd</sup> supervision/project launch mission | <ul style="list-style-type: none"> <li>• Both Task Team Leaders (Sr. Urban Transport Specialist and Sr. Transport Specialist)</li> <li>• Sr. Social Development / Resettlement Specialist</li> <li>• Environmental Specialist</li> <li>• Highway Engineer</li> <li>• Sr. Urban Specialist</li> <li>• Lead Procurement Specialist</li> <li>• Sr. Financial Management Specialist</li> <li>• Sr. Communications / External Affairs Officer</li> </ul>   |
| March 25 to 28, 2003<br>Limited resettlement mission                          | <ul style="list-style-type: none"> <li>• Sr. Social Development /Resettlement Specialist</li> <li>• Consultant Architect</li> </ul>   |
| April 16 – 19, 2003<br>Limited environment mission                            | <ul style="list-style-type: none"> <li>• Environmental Specialists</li> </ul>   |
| May 12 to 28, 2003<br>3 <sup>rd</sup> supervision / technical visit           | <ul style="list-style-type: none"> <li>• Co-Task Team Leader (Sr. Transport Specialist)</li> <li>• Sr. Urban Specialist</li> <li>• Financial Management Specialist</li> <li>• Social Development /Resettlement Specialist</li> </ul>  |
| June 23 to 28, 2003<br>Limited environment mission                            | <ul style="list-style-type: none"> <li>• Environmental Specialists</li> </ul>   |
| July 22 to 25, 2003<br>Technical visit  | <ul style="list-style-type: none"> <li>• Highway Engineer</li> </ul>  |
| September 22 to October 1, 2003<br>4 <sup>th</sup> supervision mission        | <ul style="list-style-type: none"> <li>• Both Task Team Leaders (Lead Urban Transport Specialist and Sr. Transport Specialist)</li> <li>• Sr. Social Development /Resettlement Specialist</li> <li>• Environmental Specialist</li> <li>• Highway Engineer</li> <li>• Sr. Urban Specialist</li> <li>• Sr. Procurement Specialist</li> <li>• Financial Management Specialist</li> <li>• Sr. Communications/External Affairs Specialist</li> <li>• Consultant Railway Specialist</li> <li>• Consultant Architect</li> <li>• Consultant Bus Specialist</li> </ul> |
| November 18-19, 2003<br>Limited environment mission                           | <ul style="list-style-type: none"> <li>• Environment Specialist</li> </ul>  |
| March 5 to 26, 2004<br>5 <sup>th</sup> supervision mission                    | <ul style="list-style-type: none"> <li>• Co-Task Team Leader (Sr. Transport Specialist)</li> <li>• Sr. Social Development /Resettlement Specialist</li> <li>• Environmental Specialist</li> <li>• Highway Engineer</li> <li>• Urban Specialist</li> <li>• Sr. Procurement Specialist</li> <li>• Financial Management Specialist</li> <li>• Sr. Communications/External Affairs Specialist</li> <li>• Consultant Railway Specialist</li> <li>• Consultant Architect</li> <li>• Consultant Vehicle Maintenance &amp; Inspection Specialist</li> </ul>           |
| April 7 and 8, 2004<br>Resettlement and rehabilitation specific mission       | <ul style="list-style-type: none"> <li>• Sr. Safeguard Adviser</li> <li>• Lead Sociologist</li> <li>• Sr. Social Development /Resettlement Specialist</li> </ul>  |
| July 5 to 13, 2004  | <ul style="list-style-type: none"> <li>• Task Team Leader (Sr. Transport Specialist)</li> </ul>   |

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| <b>Date of Visits</b>                                    | <b>Key Members of the Team</b>   |
|--|--|
| Specific mission concerning Requests to Inspection Panel | <ul style="list-style-type: none"><li>• Sr. Social Development / Resettlement Specialist</li><li>• Environmental Specialist</li><li>• Lead Sociologist from Quality Assurance and Compliance Unit</li><li>• Lead Environment Specialist from Quality Assurance and Compliance Unit</li><li>• External Affairs Advisor</li><li>• Operations Advisor</li></ul> |

**ANNEX 3**  
**SUMMARY OF CONSULTATIONS ON RESETTLEMENT ASPECTS**

1. Public consultations have provided important input into the process of planning and designing the MUTP. Concerning resettlement issues, consultations were carried out on an ongoing basis. In the case of the SCLR, SPARC and NSDF are engaged by the implementing agency to provide implementation support including the work of consultations.
2. During Project preparation, as part of Environmental Assessment, a series of consultations was organized targeting the audience of NGOs, affected persons, civil society, general public and implementing agencies to disseminate information about the resettlement provisions, implementation mechanism, etc. The minutes of these consultations are well documented and are described on page 95 of the PAD. In addition, consultations were also held in December 2002 with a sample of Project Affected Persons (to be moved to the Mankhurd resettlement site) as part of the preparation of the May 2003 CEMP. A summary of the consultations is in the CEMP report for Mankhurd.
3. With regard to the SCLR, Project Affected Persons were consulted during the household surveys and preparation of RIP during October-December 2002. The details of the consultations are described in para. 1.9-1.12 and para. 3.21 of the RIP dated April 2003. Details about the socio-economic make-up of all affected families are available in RIP Annex III. Consultations were held on an ongoing basis by SPARC and also with the elected representatives from time to time. In these meetings, the details of alternative housing at Mankhurd were explained. A meeting was held with the prospective resettlers of Mankhurd, including 60 Project Affected Persons from SCLR on June 9, 2003 at the Mankhurd site to explain the draft layout and design of the township. The feedback from the Project Affected Persons was incorporated in the final designs. However, it cannot be documented whether or not the Requesters participated in this meeting. Another meeting was held with the Requesters on May 28, 2004 by MMRDA to discuss their specific concerns and offer clarifications. As described in Section V of the main text, resettlement implementation processes will be strengthened.
4. An Independent Monitoring Panel (IMP), consisting of eminent citizens of Mumbai, meets periodically to review the resettlement implementation progress, including the outstanding complaints and grievances. The IMP also undertakes field visits to listen to concerns and problems of Project Affected Persons. To date, six IMP meetings have been held (April 23, 2001; October 24, 2001; April 26, 2002; July 9, 2002; May 2, 2003; and November 7, 2003). The minutes of these meeting are available in the Project files. As described in Section V of the main text, the IMP will be revamped and expanded.
5. **Public Information Centre (PICs).** Two PICs, one at MMRDA (in Bandra East) three kms from the site of SCLR and another PIC at Mankhurd (managed by SPARC) have been operative since the beginning of the Project. All the relevant documents and reports including the resettlement related documents, brochures, copies of Project R&R Policy, etc. are available for general public use. In response to the Bank's March 2004

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supervision mission, an additional PIC was opened in April 2004 about 1 km southwest of the Requesters' location. As noted in Section V of the main text, improvements will be made to the new PIC.

## ANNEX 4 ENVIRONMENTAL CONDITIONS — MANKHURD RESETTLEMENT SITE\*

Resettlement of some households affected by MUTP (see Annex 1, Items 1 and 5 for site selection process) will be to plots within the Mankhurd resettlement site (see Map 3). According to the MCGM development plan for the area, the part of the Mankhurd resettlement site being developed for MUTP was reserved for Public Housing/Housing for Dis-housed (PH/DH) and another part was converted to Residential (R) from industrial site (I3). The total area is approximately 78,440 m<sup>2</sup>.

### *Surroundings*

Two natural watercourses (drains or nallas) on the eastern and western sides of the resettlement site carry storm water to Thane creek. Discussions with residents of the Mankhurd area have provided information that no flooding incident has occurred during the last five years. The drains are 8 to 10 m wide and are well-trained to drain excess storm water during peakflow, but water quality is deteriorated, based on a visual assessment. The nearest building to the nalla under construction for MUTP resettlement is located 30 m away. MCGM desilts the nallas every year before the monsoon. MMRDA also undertook desilting of these nallas immediately after construction work commenced. Natural channels, similar to those that drain into the creek on the eastern side or to the sea on the western side are a common feature in Mumbai.

### *Water Supply*

The permanent water supply for the Mankhurd resettlement scheme, after the construction phase, will be through water mains from a municipal source linked to the Trombay Reservoir; this is expected to be much more regular than the intermittent (three to four hours a day), existing water supply from a pumping station in Deonar. Water being supplied through municipal mains is of potable quality.

### *Air Quality*

The Mankhurd site is not directly exposed to noxious emissions, as there are no industrial activities in the vicinity. To the south of the plot at a distance of 0.5 to 1 km, runs the Sion-Panvel Highway, where traffic volume is high. North of the plot, separated by land demarcated for housing, the Ghatkopar-Mankhurd Link Road lies at a distance of about 0.5 to 1 km. These roads are the major source of air pollution affecting the site. Thus, ambient air quality depends on traffic flow and meteorological conditions.

In order to compare the ambient air quality at the Mankhurd site with other R&R sites and locations in Mumbai, data from various primary and secondary sources are presented in Table 1 below.

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\* Information in this annex is taken from a document prepared by MMRDA entitled "Environmental Status of Mankhurd Site in Comparison with Other Areas of Mumbai," sent to the Bank on July 16, 2004.

**Table 1: Ambient Air Quality at R&R sites in Mumbai**

| Location                         | SO <sub>2</sub> ug/m <sup>3</sup> | NO <sub>x</sub> ug/m <sup>3</sup> | CO in mg/m <sup>3</sup> | RSPM ug/m <sup>3</sup> | SPM ug/m <sup>3</sup> |
|----------------------------------|-----------------------------------|-----------------------------------|-------------------------|------------------------|-----------------------|
| Mahul                            | 5-10                              | 11-17                             | 2-3                     | 63-70                  | 111-126               |
| Anik I                           | 10                                | 21-30                             | 1-3                     | 68-72                  | 118-126               |
| Anik II                          | 10                                | 25                                | 2                       | 70                     | 120                   |
| Mankhurd*                        | 20.53                             | 29.53                             | -                       | -                      | 159                   |
| Asgaonkar                        | 7-8                               | 8-10                              | < 1                     | 46 - 49                | 220 – 258             |
| NSE                              | 7 – 8                             | 8- 11                             | 1 – 2                   | 65 – 75                | 208 – 253             |
| Nirlon                           | 10 – 12                           | 12 – 17                           | 2 – 3                   | 75 - 82                | 242 – 332             |
| Near Vidyanagari, Kalina         | 10.8                              | 63.8                              | 1.45                    | 238                    | 526                   |
| Near Hansbhugra Road, Santa Cruz | 4.6                               | 42.7                              | 0.96                    | 197                    | 500                   |
| Hiranandani Gardens, Powai       | 12.45                             | 55.2                              | 1.3                     | 85                     | 170                   |
| L&T Junction                     | 41.3                              | 36.8                              | 1.9                     | 123.8                  | 272.8                 |
| Gandhi Nagar Police Station      | 40.4                              | 29                                | 0.57                    | 121.4                  | 257.5                 |
| Near Kurla Depot                 | 33.3                              | 44.65                             | 2.48                    | 114.17                 | 240.75                |
| Amar Mahal                       | 31.07                             | 51.32                             | 2.63                    | 123.27                 | 287.22                |

Note: \* - Data from Status of Brihan Mumbai, MCGM, 1999 - 2000

In order to measure ambient air quality at the Mankhurd site, a specific monitoring program was organized by MMRDA on July 12 and 13, 2004. The monitoring program was conducted by MCGM – Environment Cell. The data collected are presented in Table 2 below.

**Table 2: Ambient Air Quality at Mankhurd Resettlement Site\***

| Parameter                           | Value | National AAQ Standards |
|-------------------------------------|-------|------------------------|
| SO <sub>2</sub> , ug/m <sup>3</sup> | 16    | 80                     |
| H <sub>2</sub> S, ug/m <sup>3</sup> | 18    | -                      |
| NO <sub>x</sub> , ug/m <sup>3</sup> | 138** | 80                     |
| CO, ug/m <sup>3</sup>               | 0.33  | 2.0 (8 hours)          |
| Ozone, ug/m <sup>3</sup>            | 18    | -                      |
| Methane, ug/m <sup>3</sup>          | 15    | -                      |
| RSPM, ug/m <sup>3</sup>             | 16    | 100                    |
| Benzene, ug/m <sup>3</sup>          | 33    | -                      |

\* SPM: suspended particulate matter; RSPM: respirable suspended particulate matter; CO: carbon monoxide; NO<sub>x</sub>: nitrous oxides; SO<sub>2</sub>: sulphur dioxide; H<sub>2</sub>S: hydrogen sulphide.

\*\* NO<sub>x</sub> value has been observed to be high due to unloading and other construction activities at site.

A review of the ambient air quality at all R&R sites in Mumbai and some additional locations in the city reveals that the sites located along major road transport corridors and industrial areas have higher pollutant levels than the sites located away from the transport corridors. Ambient air quality levels at the Mankhurd site, given the distance to the nearest major transport corridors (Ghatkopar-Mankhurd Link Road and Sion-Panvel Highway) meet the National Ambient Air Quality standards for a residential area, except for NO<sub>x</sub>. This parameter was elevated during the July 2004 monitoring due to considerable, on-site vehicular movements related to ongoing construction. This level is expected to come down significantly after construction is completed.



From Table 1, it can be observed that the values of SO<sub>2</sub> and NO<sub>x</sub> are higher at other R&R sites, such as L&T junction, Kurla depot, Amar Mahal and Gandhi Nagar junction, in comparison to the Mankhurd site. The values of CO, RSPM and SPM (see Table 2) indicate that Mankhurd site has acceptable ambient air quality that is within the national standards. The air quality at Mankhurd site in comparison to R&R sites at Mahul and Anik is better.

The values of SPM (Table 1) indicate that a number of sites (Asgaonkar, NSE, Nirlon, Vidyanagari near Kalina, Near Hansbhugra Road, L&T Junction, Gandhi Nagar Police Station, Kurla Depot and Amar Mahal junction) compared to Mankhurd have higher levels of SPM, which is the main pollutant of concern in Mumbai.

The H<sub>2</sub>S and methane values monitored at the site provide information to help interpret the potential impact of the landfill (1.5 to 2 km away from the site) and the two drainage channels adjoining the Mankhurd plot. The low values indicate that the air quality and pollution impact of the nalla and landfill on the resettlement site is negligible. The predominant wind direction at the site is towards the north. Because the resettlement site is located to the south of the landfill, odor-related problems from the landfill are not anticipated.

**Noise**

The ambient noise level and potential increases in it are largely due to traffic. At the current time, localized noise levels are affected by the construction activities. The impact on ambient noise levels at the site due to road traffic along Ghatkopar-Mankhurd Link Road and rail traffic along the Harbour Line is not significant, because the site is surrounded by dense settlements on the eastern, northern and southwestern sides. The Municipal colony on the western side also protects the site from noise emanating from transport corridors.

In order to compare the ambient noise levels at the Mankhurd site to noise levels at other R&R sites in Mumbai, data from various primary and secondary sources are presented in Tables 3 and 4.

**Table 3: Ambient Noise Level at various R & R sites in Mumbai**

| Location                         | Measurement |             | Standards |             |
|----------------------------------|-------------|-------------|-----------|-------------|
|                                  | Leq (day)   | Leq (Night) | Leq (day) | Leq (Night) |
| Mahul                            | 71          | 52          | 75        | 70          |
| ANIK I                           | 75          | 49          | 75        | 70          |
| ANIK II                          | 76          | 48          | 75        | 70          |
| Mankhurd                         | -           | -           | 55        | 45          |
| Asgaonkar Plot                   | 72          | 52          | 55        | 45          |
| NSE                              | 72          | 54          | 75        | 70          |
| Nirlon                           | 73          | 53          | 75        | 70          |
| Near Vidyanagari, Kalina         | 78          | 72          | 65        | 55          |
| Near Hansbhugra Road, Santa Cruz | 77          | 68          | 65        | 55          |
| Hiranandani Gardens, Powai       | 62          | 58          | 55        | 45          |
| L & T Junction                   | 83.2        | 86          | 75        | 70          |
| Gandhi Nagar Police Station      | 77.5        | 77.2        | 75        | 70          |
| Near Kurla Depot                 | 77.1        | 65          | 65        | 55          |
| Amar Mahal                       | 72.1        | 62.1        | 65        | 55          |

**Table 4: Daytime Noise levels in Mankhurd and Deonar area**

| <b>Location</b>                                    | <b>Noise Levels, dB(A)</b> |
|--|----------------------------|
| Traffic junction near slaughter house              | 77 – 81                    |
| Hindustan Biological Industries                    | 68 – 72                    |
| Deonar Primary School                              | 79 – 81                    |
| Swami Samartha Society, Bainganwadi Road           | 66 – 70                    |
| Deonar Municipal Maternity Home near Deonar Colony | 64 - 66                    |

It can be observed from Tables 3 and 4 above, that daytime ambient noise levels in Mumbai City vary between 60–83 dB(A) whereas at Mankhurd the noise levels vary between 64–81 dB(A). Ambient noise levels in Mankhurd are not generally different from other regions in Mumbai City.

### ***Biological Environment***

The unbuilt area in the vicinity of the site supports different types of vegetation such as palm trees, plantations, trees other than plantations, thorny trees, dense scrub, thorny sparse scrub, and ground vegetation. Site plans call for open space and recreational area that will be landscaped with grass and trees.

**ANNEX 5**  
**PHOTOGRAPHS\* AND DRAWINGS**

**Gazi Nagar Neighborhood - Current Residential Area of Requesters**



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\* Photographs taken by Bank staff in July 2004.

Current Location of United Shop Owners (First Request)



**Mankurd Housing - Under Construction**



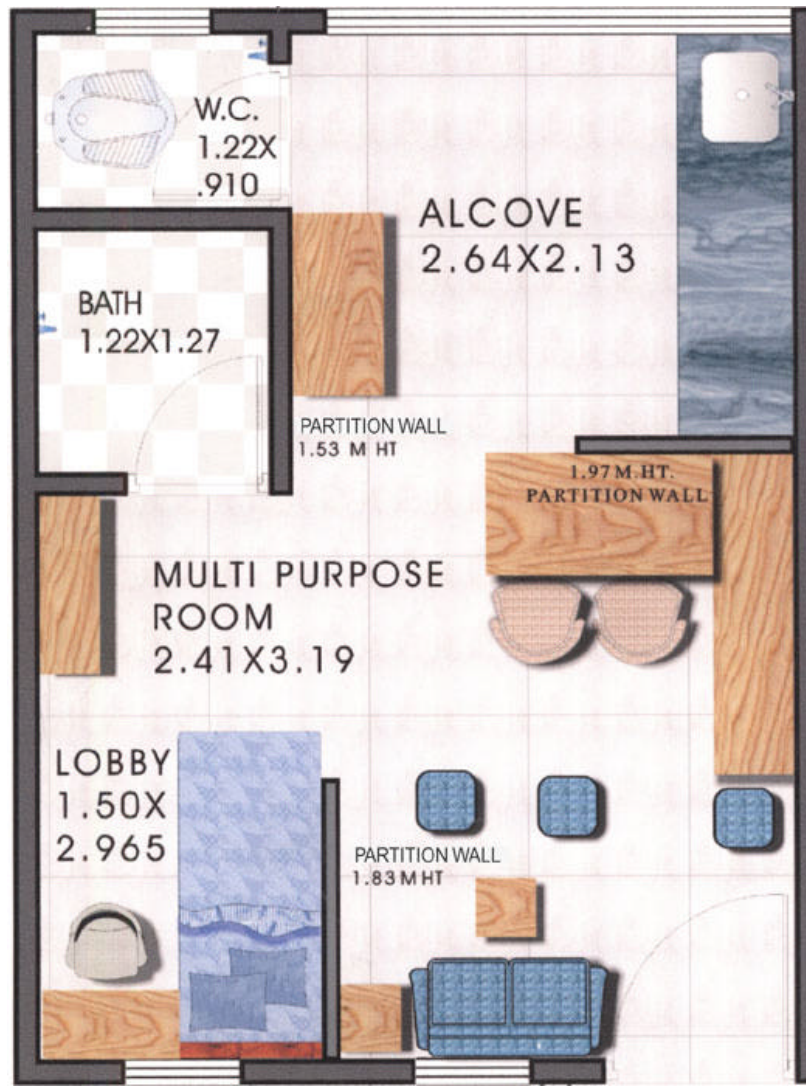
**Mankurd Shops – Existing**



**Mankurd Shops – Under Construction**



Typical Apartment Unit in Mankhurd (prepared by G.L. Pangam and Associates)



**Proposed Shopping Complex at Mankhurd (prepared by G.L. Pangam and Associates)**







**ANNEX 6**  
**ADDITIONAL CORRESPONDENCE**

- A. Letter to the Bank dated July 12, 2004 received via Feedback website from the Gazi Nagar Requesters
- B. Reply of the Bank dated July 19, 2004 to the Gazi Nagar Requesters
- C. Letter dated July 22, 2004 from the USOA addressed to the Bank, Inspection Panel and MMRDA (enclosures not included)
- D. Letter dated July 23, 2004, from the Gazi Nagar Requesters, addressed to the Bank, Inspection Panel and MMRDA (enclosures not included)

**Annex 6.A**

**Date: 12<sup>th</sup> July, 2004**

**Received as a Word document attachment to an e-mail  
Sent to the World Bank Feedback website**

**From:**

**1. Hanuman Welfare Society, Regd. No.- GBBSD-388/1985**

Chawl No.-2, ID No.-359, Gazi Nagar, Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.

**2. Gazi Nagar Sudhar Samiti, Regd. No.-GBBSD-371/1985**

ID No.-387,Chawl No.-1, Gazi Nagar, Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.

**3. Jai Hanuman Rahiwasi Sewa Sangh, Regd. No.-GBBSD-1542/1997**

Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.

**To**

**The World Bank**

1818 H St., NW, Washington, DC 20433  
USA.

**Ref.: SCLR project in Mumbai, India.**

**Sub.: Meeting of our representatives of above mentioned associations representing residents of Gazi Nagar area with the representatives of the World Bank, MMRDA, NGO 'SPARC' at MMRDA office Mumbai on 09<sup>th</sup> July, 2004.**

Sir,

Thank you for kindly arranging a tripartite meeting mentioned above and for listening to our grievances. We would like to mention some points of the meeting as follows:

1. Our main grievance is that the implementing agencies completely failed to adhere to the policies of the World Bank with respect to the project. We asked about it in the meeting and to the answer Mr. T. Chandrashekhar, Project Director, MMRDA replied very excitedly and aggressively that if the World Bank would not provide them the fund, they would manage it from somewhere else. Surprisingly, the World Bank officers kept mum on his comment. Question arises here what made such a high-level officer like Mr. T. Chandrashekhar to make such a statement. He admitted himself that they do not care for the World Bank to provide them funds as they can arrange the same through other sources, but under any circumstances they will do the work in the manner they assume fit and proper.
2. In reply to our query that why MMRDA did not reply to our letters of August and September-2003 till date seeking informations regarding the project, Mr. T.

Chandrashekhar told us that you have not addressed letter to MUTP but have addressed to Commissioner of MMRDA and therefore you did not get the answer. We further told him that we have also written letters to the Chief Minister of Maharashtra state who is also head of the MMRDA. We also informed him that one request of United Shop Owners Association vide their letter dated April 20, 2004 regarding recommendation of an investigation in SCLR project was by mistake addressed to the Bank's Department of Institutional Integrity instead of the Inspection Panel. But, the same was not only delivered to the Inspection Panel but also they registered it though it was not addressed to them. Mr. T. Chandrashekhar proudly replied us that this is India and not America. One can not hold us that much accountable and responsible as Americans are! When we told him that it means you people are not as accountable and responsible as expected by the World Bank, Mr. T. Chandrashekhar replied in yes and further stated that the peoples of Gazi Nagar should not expect any such accountabilities and transparencies neither from him nor from the government.

We feel that this is too unfair attitude of an officer holding such an important chair in the government department. **When the implementing agencies are not ready to even provide us basic informations regarding the project but performing tricks and showing their skills in hiding and defending their irresponsibilities by making illogical and baseless statements as stated above, where the question arises of following the guidelines of the World Bank, "Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs."**

Now we, the poor residents of the Gazi Nagar are unable to understand where to go for justice in such circumstances.

3. We also showed to the World Bank officers several news paper cuttings published in various leading newspapers with their English translation regarding corrupt activities and irregularities of 'SPARC', its chief Mr. Arputham Jockin and other activists. But to our utter shock and surprise Mr. T. Chandrashekhar ignored those news by saying that these news are not related with the MUTP. We also told the World Bank officers that how 'SPARC' personnel forced the poor residents of Gazi Nagar to bring their wives from their native places about 1600 kms. away from here and to pay Rs. 25/- per resident without any receipt otherwise threatened to disqualify for alternate accommodation. We also put our objection and cleared that we cannot bear with 'SPARC' any more.
4. Mr. T. Chandrashekhar also informed us that there are redressal committees headed by MMRDA officers, SPARC etc. and instead of writing to the World Bank or to Inspection Panel, the PAP's should address to these committees regarding their grievances. We replied that these committees are not lawful as how can any authority could conduct the hearing of a case in which the authority himself is an accused or respondent? How will they provide us the natural justice?

Mr. Maninder Gill of the World Bank assured as that they have taken a serious note of it and would appoint some independent and impartial authorities in these redressal committees.

We would like to suggest here to appoint retired judges of Honourable Bombay High Court to preside over these redressal committees.

5. Mr. I.U.B. Reddy of the World Bank informed us that MMRDA, is an implementing agency and not the World Bank. Mr. Reddy looked somewhat uneasy that why Gazi Nagar residents are writing so many letters to the World Bank and to the Inspection Panel as they could not come in the field each and every time to solve the problem. We politely reminded Mr. Reddy, "If the project is under implementation, Bank Management is required to supervise the discharge of the borrower's obligations under the loan agreement, including the borrower's obligation to ensure that specific aspects of Bank policies are adhered to."

However, we feel that such a responsible officer of the World Bank should not make such an irresponsible statement.

6. We informed in the meeting that our hearing has already been done under the chairmanship of joint project director Mr. Shrivardhankar on 28<sup>th</sup> May, 2004 at MMRDA in which the JPD left his chair by saying, "I have other works also to do" without answering to our grievances. Mr. Manindar Gill also informed us that the World Bank is providing fund for this project and the government is supposed to return it to the Bank with some interest. Whereas, in the hearing on 28<sup>th</sup> May, 2004, Mr. Shrivardhankar had informed us that the World Bank providing fund on Charity basis for SCLR project.
7. We informed in the meeting that our sources of income and livelihood would be destroyed if we would be shifted to any distant place such as Mankhurd which is 15 Kms. away from here and that we have our jobs and employment in the nearby locality. Mr. T. Chandrashekhar asked us to show that how much income tax we were paying to the government, then he might decide about our source of income and livelihood.

We humbly want to bring it to your kind attention that we are residing in slum area and if we would have that much earnings to be able to pay income tax, we would not have resided in slum areas. We say that Mr. T. Chandrashekhar deliberately hurt our sentiments by making such comments despite knowing the facts and tried to demoralize us that we are much inferior to talk with him and that whatever they are offering us we must accept the same as beggars without any question.

We were not expecting such kind of statements and we noticed that the World Bank officers did not object him neither tried to stop Mr. T. Chandrashekhar playing with our emotions and making light of our poverty.

8. We politely said that we would have approached the media regarding misconduct by the MMRDA, SPARC in this project. However, we do not want to drag the well reputed name of the World Bank to be spoiled due to the incapability, irresponsible and nonsense acts of the MMRDA, SPARC and the government in implementation of this project.\
9. We also reminded Mr. T. Chandrashekhar that in a meeting held on 24<sup>th</sup> November, 2003 at Chembur, Mr. T. Chandrashekhar assured then Honourable Loksabha Speaker Shri Manohar Joshi that he would talk to the Chief Minister in this regard and try his level best to rehabilitate Gazi Nagar residents within the vicinity, particularly in the transit buildings in the nearby locality. But, he did not provide us any satisfactory answer.
10. Though Mr.T. Chandrashekhar offered us that in case of any problem we may directly approach him, looking at his attitude we felt it of no use to mention our other grievances as he straight away told us that we will have to go to Mankhurd and all that he can do was to improve the conditions there possible as per our suggestions. He informed us that the vacant plots of private lands admeasuring to thousands of square meter like Premier colony, Swan Mill compound, Swadeshi Mill compound etc. in the vicinity of this locality could not be obtained for our rehabilitation. We asked him that there are plots available for the family trust of Minister Mr. Nawab Malik to whom he himself on behalf of the government has provided a vacant plot of land admeasuring to 23000 sq.ft. area situated just in front of our area, valued more than 25 Million of Indian Rupees in open Market for just Rs. One and a half Million. Then why the government cannot acquire land for our convenient relocation within the vicinity though the open spaces are available.

It is very interesting to note here that the government has acquired many private plots of land in this SCLR project itself and the government possesses full powers to acquire any land at any given time.

11. We further want to refer here the historical judgment passed by the Honourable Chief Justice Shri Y.V. Chandrachud, The Supreme Court of India in the year 1986, in the Writ Petition nos. 4610-4612 and 5068-5079 D/. 10.7.1985 in the matter of Olga Tellis and others (Petitioners) v/s. Bombay Municipal Corporation, State of Maharashtra and ors. (Respondents).

We would like to mention some excerpts to understand the soul of this judgment as under:

In the para 21, the learned Judge states, “The argument which bears on the provisions of Art. 21 is elaborated by saying that the eviction of pavement and slum-dwellers will lead, in a vicious circle, to the deprivation of their employment, their livelihood and, therefore, to the right to life. Our attention is

drawn in this behalf to an extract from the judgment of Douglas J. in *Baksey v/s. Board of Regents* (1954) 347 MD 442 in which the learned Judge said:

“The right to work I have assumed was the most precious liberty that man possesses. Man has indeed, as much right to work as he has to live, to be free and to own property. To work means to eat and it also means to live.”

The right to live and the right to work are integrated and inter-dependent and, therefore, if a person is deprived of his job as a result of his eviction from a slum or a pavement, his very right to life is put in jeopardy. It is urged that the economic compulsions under which these persons are forced to live in slums or on pavements import to their occupation the character of a fundamental right.”

Further in the para 32, the learned Judge states, “As we have stated while summing up the petitioner’s case, the main plank of their argument is that the right to life which is guaranteed by Art.21 includes the right to livelihood and since, they will be deprived of their livelihood if they are evicted from their slum and pavement dwellings, their eviction is tantamount of deprivation of their life and is hence unconstitutional. For purposes of argument, we will assume the factual correctness of the premise that if the petitioners are evicted from their dwellings, they will be deprived of their livelihood. Upon that assumption, the question which we have to consider is **whether the right to life includes the right to livelihood. We see only one answer to that question, namely that it does.** The sweep of the right to life conferred by Art. 21 is wide and far-reaching. It does not mean merely that life cannot be extinguished or taken away as, for example, by the imposition and execution of the death sentence, except according to procedure established by law. That is but one aspect of the right to life. An equally important facet of that right is the right to livelihood because, no person can live without the means of living, that is, the means of livelihood. If the right to livelihood is not treated as a part of the constitutional right to life, the easier way of depriving a person of his right to life would be to deprive him of his means of livelihood to the point of abrogation. Such deprivation would not only denude the life of its effective content and meaningfulness but it would make life impossible to live. And yet, such deprivation would not have to be in accordance with the procedure established by law, if the right to livelihood is not regarded as a part of the right to life. That, which alone makes it possible to live, leave aside what makes life livable, must be deemed to be an integral component of the right to life. Deprive a person of his right to livelihood and you shall have deprived him of his life. Indeed, that explains the massive migration of the rural population to big cities. They migrate because they have no means of livelihood in the villages. The motive force which propels their desertion of their hearths and homes in the village is the struggle for survival, that is, the struggle for life. So unimpeachable is the evidence of the nexus between life and the means of livelihood. They have to eat to live: only a handful can afford the luxury of living to eat. That they can do, namely, eat, only if they have the means of livelihood. That is the context in which it was said by Douglas J. in *Baskey*, (1954) 347 M.D. 442 that the right to

work is the most precious liberty that man possesses. It is the most precious liberty because, it sustains and enables a man to live and the right to life is a precious freedom. "Life", as observed by Field, J. in *Munn v/s. Illinois*, (1877) 94 US 113, means something more than mere animal existence and the inhibition against the deprivation of life extends to all those limits and faculties by which life is enjoyed. This observation was quoted with approval by this Court in *Kharak Singh v/s. State of U.P.*, (1964) 1 SCR 332: (AIR 1963 SC 1295).

While in the concluding para nos. 55 and 56 the learned Judge states, "There is no short term or marginal solution to the question of squatter colonies, nor are such colonies unique to the cities of India. Every country, during its historical evolution, has faced the problem of squatter settlements and most countries of the under-developed world face this problem today. Even the highly developed affluent societies face the same problem, though with their larger resources and smaller populations, their task is far less difficult. The forcible eviction of squatters, even if they are resettled in other sites, totally disrupts the economic life of the household. It has been a common experience of the administrators and planners that when resettlement is forcibly done, squatters eventually sell their new plots and return to their original sites near their place of employment. Therefore, what is of crucial importance to the question of thinning out the squatters' colonies in metropolitan cities is to create new opportunities for employment in the rural sector and to spread the existing job opportunities evenly in urban areas. Apart from the further misery and degradation which it involves, eviction of slum and pavement dwellers is an ineffective remedy for decongesting the cities. In a highly readable and moving account of the problems which the poor has to face, Susan George says (*How the other Half Dies – The Real Reasons for World Hunger* (pelican books)):

"So long as thorough going land reform, regrouping and distribution of resources to the poorest bottom half of the population does not take place, Third World countries can go on increasing their production until hell freezes and hunger will remain, for the production will go to those who already have plenty – to the developed world or to the wealthy in the Third World itself. Poverty and hunger walk hand in hand."

And para 56, "We will close with a quotation from the same book which has a message:

Thus, our request to resettle and rehabilitate us in the nearby locality (where tens of thousands of square meters of vacant space is available viz. Premier colony, Swadeshi Mill land, Swan Mill land, Bandra-Kurla Complex land, land allotted to Rehbar trust etc.) is in accordance with the guidelines established by the Honourable Supreme Court of India. If we are evicted forcibly (which we fear can be done looking at the rough behaviour of the implementing authorities) to any proposed polluted or distant area, we would suffer irreparable harm and great

injustice. It will also be against the guidelines laid down by the Supreme Judicial authority of the land.

In view of the aforesaid facts and circumstances and as admitted by Mr. T. Chandrashekar himself it is crystal clear that the implementing agencies are not capable of implementing project of such a vast magnitude with due responsibility as per the policies of the World Bank.

You are once again kindly requested to do the needful and oblige.

Thanking you,

Yours Faithfully,

1. Siyaram G. Maurya , Contact No.- 022-2503 90 70  
(President- Hanuman Welfare Society)
2. Raj Bahadur R. Pal, Contact No.-09869 111 948,  
(Secretary- Hanuman Welfare Society)
3. Ambkeshwar J. Pandey  
(President- Jai Hanuman Rahiwasi Sewa Sangh)
4. Rattilal T. Gupta, Contact No.-022-2503 85 96  
(Secretary- Jai Hanuman Rahiwasi Sewa Sangh)
5. Dwarika Prasad S. Yadav, Contact No.-022-2503 51 24  
(Secretary- Gazi Nagar Sudhar Samiti)
6. Vasudeo Maurya
7. Bhawnath Sharma
8. Raj Awasthi

**(All above-mentioned persons were present in the above stated meeting held on 09<sup>th</sup> July, 2004)**

**Encl.:**

Photocopy of the Judgment of Honourable Supreme Court 180 (AIR 1986)

**C.C. to:**

**The Inspection Panel,**  
1818 H St, NW, Washington, DC 20433  
USA.



**The World Bank**

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT  
INTERNATIONAL DEVELOPMENT ASSOCIATION

New Delhi Office  
70 Lodhi Estate  
New Delhi – 110 003  
India

Telephone :24617241/24619491  
Cable Address: INTBAFRAD  
Mailing Address : P.O Box 416  
Facsimile: 24619393

July 19, 2004

Hanuman Welfare Society, Regd No. GBBSD-388/1985  
Chawl No. 2, ID No. 359, Gazi Nagar, Near MIG Colony  
Vinoba Bhave Road, Kurla (west), Mumbai – 400 070

Gazi Nagar Sudhar Samiti, Regd. No. GBBSD-371/1985  
ID No.387, Chawl No. 1. Gazi Nagar, Near MIG Colony  
Vinoba Bhave Road, Kurla (West), Mumbai – 400 070

Jai Hanuman Rahiwasi Sewa Sangh, Regd. No. GBBSD-1542/1997  
Near MIG Colony  
Vinoba Bhave Road  
Kurla (West), Mumbai – 400 070

Dear Sirs

**Mumbai Urban Transport Project (MUTP) (Cr.36620-IN)**  
**Meeting of Gazi Nagar Association with the representatives of The World Bank, MMRDA**  
**and SPARC on July 9, 2004**

Thank you for your letter of 12th July regarding the meeting that was held in Mumbai on 9th July, and which was attended by yourself, the Project Director for MUTP and his staff, and several of my colleagues from the World Bank.

My colleagues have given me a detailed report on this meeting. They have told me how important and useful it was for representatives of the Gazi Nagar residents to air their concerns face to face with the Project Director and staff of MUTP. They agree that there was a difficult start to the meeting, but they also felt that the remarks by the Project Director were useful in clarifying the respective roles of MMRDA and the Bank in the implementation of MUTP. More importantly, we also would like to say that your letter omits to mention that the latter part of the meeting became very constructive, and in particular that it concluded with agreement by all the parties present on a number of points, namely that:

- (i) the project authorities would significantly strengthen the process for sharing of information with affected people;
- (ii) there would be mechanisms for regular consultations between the project authorities and the affected people;
- (iii) grievance redress procedures would be revamped to ensure that an independent entity chaired the grievance redress committees at different levels; and
- (iv) the project authorities would facilitate a visit of the affected people to the Mankhurd resettlement site within one week from the date of the meeting. After the visit, the affected people would make suggestions, if any, to further improve the facilities at the Mankhurd resettlement site. The Project director would hold another follow-up meeting within one week of the site visit to listen to the views

July 19, 2004

and suggestions of the affected people and decide further course of action with them.

We have now written to the Director MUTP conveying confirmation of the above-mentioned agreements. We will of course be carefully monitoring developments to check that the steps agreed at the meeting are being implemented. We very much hope that the constructive atmosphere that prevailed during the latter part of the meeting will continue to prevail and that this will facilitate reaching an early solution to the issues raised in the original complaint to the satisfaction of all concerned. Thank you for writing to us.

Yours sincerely,



Michael F. Carter  
Country Director, India

**Copy to :**

**The Inspection Panel,**  
1818 H st., NW, Washington, DC.20433,  
USA.

**Dr. T Chandra Shekhar**  
Project Director and Additional Metropolitan Commissioner  
MMRDA, Mumbai.



# United Shop Owners Association

Regd. No. G.B.B.S.D - 1555/03

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.

Ref. No. \_\_\_\_\_

Date . \_\_\_\_\_

22/7/2004

The World Bank  
1818 H Street, N.W.,  
Washington, D.C. 20433

The Inspection Panel  
1818 H Street, N.W.,  
Washington, D.C. 20433

The World Bank Office  
70, Lodi Estate  
New Delhi-110003

Shri C.B. Rokde, Chief R&R, MUTP  
MMRDA Building, Bandra (East)  
Mumbai-400051

**Sub: SCLR Project under MUTP-Mumbai (India)**

**Ref: Letter of MMRDA no. MUTP/R&R/SCLR/Kismat Nagar/2004 dated 19<sup>th</sup> July 2004**

Sir,

At the outset, we say that your so-called minutes attached with the above-referred letter are frivolous and concocted. It is one more attempt to play foul with our trust as you have misinterpreted several points and trying to mislead its readers thereby.

We say that we did not mention any issues or grievances in the meeting held on 9<sup>th</sup> July, 2004 at MMRDA. Instead, we made it clear right in the beginning of the meeting that we had already informed the World Bank and MMRDA about our various grievances and hence attended the meeting just to listen to your replies on them. We listened to the answers given to us on various issues by you and clarified the things wherever deemed fit.

(Contd..... 2)

# United Shop Owners Association

Regd. No. G.B.B.S.D - 1555/03

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.

Ref. No. \_\_\_\_\_

Date . \_\_\_\_\_

Though the record of minutes prepared by you is concocted, we wish to clarify our stand paragraph wise to put the record straight as below:

1) As mentioned under para no.1, we never said that we were owners of the land on which our structures stand. We say that we are tenants on private land since 1959. We were shocked to learn in the meeting that BMC had acquired this land though our structures have stood on this very same land for the last 40 years. Why did BMC not inform us about this acquisition at that time? We repeat that we are not encroachers on this land because original landlords of this land had allotted plots for business/residential purposes since '60s. We say that it was duty of BMC to inform us about the acquisition because our structure pre-existed before their acquisition. Mr. T. Chandrashekhar, P.D., MUTP admitted in the meeting that the word 'squatter' mentioned on identity cards would be removed which vindicates our stand.

2) When MMRDA officials told us that we would be allotted tenements admeasuring 225 sq. ft. free of cost or 750 sq. ft. at extra cost for 525 sq. ft., we asked them to poison us instead of providing us with such a small area at some distant place from our current location because it would result in our complete ruination. We would like to state here that this is an open violation of the World Bank's policy of Involuntary Resettlement as well as other policies in respect of its funded projects. We were never consulted or given participation at any stage of project planning or R&R.

Regarding your claim that out of 118 affected PAP's of our association, 10 were not in BSES, we remind you that record of survey is incorrect which we have requested to correct on numerous occasions. Regarding lesser or more areas than 225 sq. ft. possessed by different shop owners, we say that we do not want our business groups and our economic and social networks, infrastructures and kin groups to disperse. After listening to MMRDA officials carefully we have observed that the R&R policy is against natural justice which we said at the meeting itself. It also violates Article 21 of the Constitution of India because if the means of livelihood is denied to a person it amounts to denial of life guaranteed under the said article. This is the stand taken by the Supreme Court of India.

(Contd..... 3)



# United Shop Owners Association

**Regd. No. G.B.B.S.D - 1555/03**

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.

Ref. No. \_\_\_\_\_

Date . \_\_\_\_\_

3) Whatever you have stated under this para is totally a figment of your imagination since it is false and nothing of this sort was clarified or mentioned by P.D. in the meeting such as, 'they should first calculate their present income levels...' etc. These lines are deliberately inserted in the record of minutes by MMRDA officers and we condemn the same.

Furthermore, concerning the categorization of our businesses, we had already made it clear that our businesses were interdependent, inter-related and integrated with social and economic infrastructure and network and we did not want to dismantle our productive resources and our kin groups to disperse.

4) It is true that if the width of the road could be made 39 meters, it would solve some of our problems but not 'all the issues' as wrongly mentioned in the so-called minutes. We say that on 25<sup>th</sup> March, 2004 the issue was raised with Mr. Sumir Lal of the World Bank and Mr. Shriwardhankar of MMRDA had replied that it was not finalized then and that discussions were going on. He also informed in that meeting that originally the plan was made by MMRDA of 39 meters width road only. So how it was changed later and under what circumstances is a mystery to us. We, therefore, ask this question one more time.

5) With respect to this paragraph, we say that prior to your informing us about BMC having acquired the land we knew it to be a private property. So instead of SRA, you may give extra F.S.I. as requested by us considering our case as a special case for insitu rehabilitation as requested by the association vide its letter dated 27<sup>th</sup> June, 2004.

With respect to your observation, 'mutually exchange the area' you have again misinterpreted as we neither appreciated it nor promised that we would work on it. As, for example, would you agree to exchange your residence with ours? Certainly you would not appreciate it or promise to work on it.

6) You have again put a wrong statement in this paragraph. The fact is that, Mr. T. Chandrashekhar had told our association that he had extended co-operation to the shopkeepers by not objecting to raising of heights of their shops by them. On asking him whether he had given any permission for it and if those structures would be considered legal, he replied in the negative. We objected at that time that if it was so it was better not to discuss such misleading matters and waste time over them.

(Contd..... 4)



# United Shop Owners Association

**Regd. No. G.B.B.S.D - 1555/03**

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.

Ref. No. \_\_\_\_\_

Date . \_\_\_\_\_

We say that we never enquired about construction of upper floor or mezzanine floor at Mankhurd site. On the contrary Mr. T. Chandrashekhar on his own informed us that MMRDA is making ground floor only structures of 14 feet height and the same could be raised up to 3 storeys by the shopkeepers. He also informed that mezzanine floor could also be constructed for residential or commercial purposes as required by the shopkeepers. Hence, we now feel cheated and betrayed by deliberate inclusion of such fabricated statements in the minutes.

7) The P.D. had informed that other sites were also available where the shops could be constructed. We, therefore, request you first to provide us with related plans of those sites so that our committee members consider their viability for business purposes. After this exercise of ascertaining income generation, locality and the distance from present location and ascertaining compliance with the policies of the World Bank in this behalf is over, we shall revert to you and reply accordingly. When you told us that we were encroachers, we had asked you about the legal status of the remaining portion of the affected structures. You replied that the remaining portion would also be treated as illegal. Hence, we feel that this is not an R&R program but a program of harassment and so the request for poison was made to you to finish us instead of resettling in such a manner.

Shri Raj Awasthi did not mention at all about cutting of trees coming in the way without permission. What he did say was that the permission for cutting of trees was given by the Tree Authority on the condition to plant new trees or to transplant young trees in the area within a period of 30 days from the day of their cutting/removing. Shri Raj Awasthi had brought to the attention of our association that agencies/persons responsible for planting/transplanting were yet to discharge their obligation even after passing of 3 months since the trees were hacked. We say that such acts are in violation of World Bank's policy of Environment Assessment and also Article 51(g) of the Constitution of India. The article states, 'It should be the duty of every citizen of India to protect and improve the natural environment, including trees, forests, lakes, rivers and wild life, and to have compassion for living creatures'.

We would also like to put on record that Shri Raj Awasthi has been receiving threatening calls recently from international Mafia to keep himself away from this project after he attended this meeting. We condemn such tactics to pressurize our members whosoever may be behind such moves.

(Contd..... 5)

# United Shop Owners Association

Regd. No. G.B.B.S.D - 1555/03

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.



Ref. No. \_\_\_\_\_

Date . \_\_\_\_\_

Mr. Maninder Gill and other officials of the World Bank might have appreciated the spirit in which the meeting was held but we were totally disappointed by it as nobody either from MMRDA or the World Bank tried to explain us how and in what manner various polices of the World Bank had been followed right from project planning to its implementation and R&R. As stated earlier, we had told you right in the beginning of the meeting that our grievances were in writing before MMRDA and the World Bank and that we had come to have answers for them. But we feel extremely sorry to say that neither MMRDA nor officials of the World Bank clarified their views on our main grievances, which constitute violation of various polices of the World Bank. We further say that we have already submitted main points of the meeting to the World Bank and the Inspection Panel, U.S.A.

We further say that we had informed earlier also about corrupt activities of the NGO, 'SPARC' but the officials from the World Bank did not express their views on them.

We say that MUTP might be a prestigious project for MMRDA but equal importance should also be given to our means of livelihood, sources of income and employment of thousands of local residents of our area while implementing the project. Hence, in conclusion, it is clear that our rights of participation and consultation right from the beginning of this project have been completely denied. We were not provided with any information by the government as well as MMRDA at any stage of this project and R&R. Moreover, after having experience with top level officers of MMRDA, it is clear that even they can deviate to an angle of 180 degrees from whatever they say in the meetings. We say that it is really a pity and shame that high level officers of the MMRDA are also involved in fabricating statements and concocting minutes of meetings. We say that MMRDA has entirely failed to get our trust. So we cannot be expect them to be accountable, transparent and efficient to implement such a huge project.

We say that the government as well as implementing agencies failed to take our consent regarding any such project affecting us. We would not be benefited by this project in any way. On the contrary, this project completely destroy our means of livelihood, our sources of income and thus deprive us of our right to life which is conferred to us vide Article 21 of the Constitution of India. The same is directed by the honorable Supreme Court of India to the state government of Maharashtra and BMC.

In view of the aforesaid facts and circumstances and at this stage now anyone can understand how the state government and implementing agencies have conspire to ruin us instead of providing any benefits. Hence, we strongly oppose any such project like SCLR



# United Shop Owners Association

Regd. No. G.B.B.S.D - 1555/03

Plot No. 6, Shop No. 2, C.S.T. Road, Opp. Kapadia, K. J. Entp., Kurla (West), Mumbai - 400 070.

Ref. No. \_\_\_\_\_

Date \_\_\_\_\_

and say that this project must not be implemented under any circumstances as the same is in violation of the Constitution of India. It also violates directions and guidelines issued by the supreme judicial authority of the land.

**Note: Mrs. Shorlett Banger from the World Bank, Washington D.C. attended the meeting but her name and signature is missing from the attendance sheet. Officials of MMRDA, the World Bank and SPARC did not sign the attendance sheet attached with the minutes for reasons best known to them.**

Yours faithfully,

Raj Awasthi

Mohammad Tarique Khan

Maqbool Ahmad Siddiqui

Siddique Ahmad

Yaqub Kamal Varaliya

P.K. Dedhia

**(The above signatories had attended the meeting)**

Enclosures: Misleading Minutes of the Meeting held on 9/7/2004 by MMRDA  
News published in Asian Age & Dopahar Ka Samna



Annex 6.D

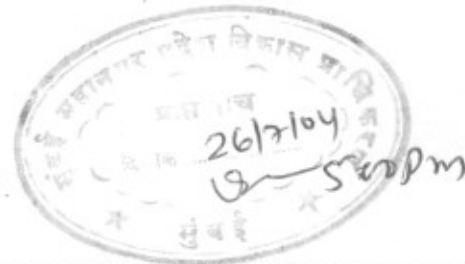
From :

Date: 23<sup>rd</sup> July, 2004.

1. Hanuman Welfare Society, Regd. No.- GBBSD-388/1985  
Chawl No.-2, ID No.-359, Gazi Nagar, Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.
2. Gazi Nagar Sudhar Samiti, Regd. No.-GBBSD-371/1985  
ID No.-387, Chawl No.-1, Gazi Nagar, Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.
3. Jai Hanuman Rabiwasi Sewa Sangh, Regd. No.-GBBSD-1542/1997  
Near MIG Colony,  
Vinoba Bhave Road, Kurla(west), Mumbai-400 070.

To

1. The World Bank,  
1818 H st., NW, Washington, DC.20433,  
USA.
2. The Inspection Panel,  
1818 H st., NW, Washington, DC.20433,  
USA.
3. The World Bank,  
New Delhi Office,  
70, Lodi Estate, New Delhi-110003.
4.  Shri C.B. Rokde  
Chief, Rehabilitation & Resettlement,  
Mumbai Metropolitan Region Development Authority,  
Bandra-Kurla Complex, Bandra(East), Mumbai-400051.



Ref.: SCLR project in Mumbai, India and letter no.-MUTP/R&R/SCLR/Gazi nagar/2004 dated July 19, 2004 and so called and misleading minutes prepared by MMRDA attached there with.

Sir,

.....Contd. page2/-

Please be informed that we have already submitted the main points discussed in the meeting held on 9<sup>th</sup> July, 2004 at **3.00 pm** ( not 2.30 pm ) at MMRDA, 6<sup>th</sup> floor, Committee room , to the World Bank, USA and to the Inspection Panel, USA.

However, we would again like to refresh MMRDA official's memory about what was actually discussed in the meeting in presence of the World Bank officials.

The representatives of the association mentioned their main grievance regarding violation of various policies of the World Bank in the project. We mentioned that the PAP's of Gazi nagar were not given an opportunity to participation and consultation in planning as well as implementation of this project. In fact, the residents of Gazi nagar are being coerced upon and pressurized to accept this project and their resettlement without their consent and will.

We are giving point by point correction to present misleading minutes prepared by MMRDA as under :

1. It is true that we have sent several letters to MMRDA seeking first hand information regarding the project, but the same were not replied.
  2. It is true that the project is not implemented as per the policies of the World Bank.
  3. Our issue is not that we were not consulted on the issue of shifting to Mankhurd site as we do not want to be shifted there because of so many reasons stated earlier also. But, our issue is that we were neither consulted nor informed about anything related to this project prior to writing letters to the World Bank.
  4. It is also true that Mankhurd site is unsuitable, polluted, near the dumping ground and far away from our current location.
  5. This issue mentioned in so called minutes is not our issue. In fact, our issue is that no survey has been conducted in Gazi nagar area to know how many children are studying in various schools with what medium ( language ).
  6. This issue is also misleading as stated in above referred so called minutes. In reality, our issue is the corrupt and irresponsible activities of 'SPARC' published in various newspapers and that how they had collected money illegally from us and how they forced us to bring our spouses from our native places from almost 1600 kms. away.
- We also raised our concern on the fact that our sources of income and livelihood would be destroyed if we were shifted to any distant and polluted place such as Mankhurd.
  - We also raised our issue of relocation and rehabilitation in the nearby vicinity where lakhs of square meter open plots of land are available.

Though MMRDA has deliberately omitted various important issues, facts and objectionable statements made by Shri T. Chandrashekhar in these minutes which is nothing but creation of ill-minded so called high grade officers of the MMRDA, we would like to remind and correct these points parawise as under :

1. Regarding replies to the various letters, the PD said that since these letters were addressed to the Commissioner of MMRDA and therefore you did not get the answer. We further told him that we have also written letters to the Chief Minister of Maharashtra state who is also head of the MMRDA. We also informed him that one request of United Shop Owners Association vide their letter dated April 20, 2004 regarding recommendation of an investigation in SCLR project was by mistake addressed to the Bank's Department of Institutional Integrity instead of the Inspection Panel. But, the same was not only delivered to the Inspection Panel but also they registered it though it was not addressed to them. Mr. T. Chandrashekhar proudly replied us that this is India and not America. One can not hold us that much accountable and responsible as Americans are! When we told him that it means you people are not as accountable and responsible as expected by the World Bank, Mr. T. Chandrashekhar replied in yes and further stated that the peoples of Gazi nagar should not expect any such accountabilities and transparencies neither from him nor from the government.

When Mr. T. Chandrashekhar told us to approach the FLGRC or SLGRC, we reminded that we had already been called upon and attended hearing by the above committees on 28<sup>th</sup> May, 2004 under the chairmanship of JPD and records of that meetings were already dispatched to MMRDA. We are still waiting for the order passed in that meeting.

2. It is true that PD clarified about the role of the MMRDA and admitted himself not to expect that much efficiency and accountability as expected from the World Bank in America as it was India and not America. The World Bank official Mr. IUB Reddy also asked why people of Gazi nagar were writing so many letters to the World Bank and the Inspection Panel since MMRDA was the implementing agency, we reminded Mr. Reddy, "If the project is under implementation, Bank Management is required to supervise the discharge of the borrower's obligations under the loan agreement, including the borrower's obligation to ensure that specific aspects of Bank policies are adhered to."

.....Contd. page4/-

In fact, MMRDA and the World Bank officials accepted violation of several policies of the World Bank like disclosure of Information, right to participation and consultation, project supervision, involuntary resettlement, environment assessment etc. Mr. T. Chandrashekhar told us that he would go ahead with the project even if the World Bank backed out to fund the project, as they were capable to arrange the funds from other sources.

3. Whatever is stated in this para in above referred so called minutes is misleading. In fact, the main discussion was that the people of Gazi nagar area came to know about this project only when they saw some digging of road started on C.S.T. road and a board was put up mentioning name of MMRDA and SCLR project on it in the month of August- September-2003 and rumours started floating about Gazi nagar area may coming in the route of the proposed project. Hence, the residents here wrote letters to the Commissioner of MMRDA assuming him the responsible authority seeking various information regarding the project. The residents of Gazi nagar area were not aware of anything as stated in this para of the so called minutes of the MMRDA and deny it in toto. We were not shown any records of any meeting whatsoever as alleged in the so called minutes.
4. With respect to this para we would like to say that it may be an ambitious project of the state government but it is/will be killing ambitions of hundreds of families of Gazi nagar area. Mr. T. Chandrashekhar is talking about 10,000 families and shops to be shifted both under MUIP & MUTP at Mankhurd site We invite the World Bank to visit and survey the condition of 6,261 PAP's resettled into the transit camps at Mankhurd and to see that how they are living in conditions lower than animals in these camps and how the MMRDA is wasting money and fooling the World Bank.

On one hand, MMRDA could not provide the basic amenities to the already shifted PAP's, on the other hand, they are claiming to provide necessary infrastructure. We have visited the transit camp where MMRDA has rsettled 6,261 PAP's and know the reality very well and anyone can go and realize the hollowness of the hi-fi claims made by implementing agencies in the air. MMRDA people might be living in future but we are the poor people with not a brain like high-grade officers of MMRDA. We poor people prefer to live in Present time and hence kindly do not show us the sweat dreams of Good Township of future. We request MMRDA to provide basic amenities and facilities to the poor PAP's already shifted to Mankhurd transit instead.

It is very correct that the Mankhurd site is 15 kms. away from Gazi nagar and we challenge MMRDA and the World Bank officials to come with us in a car and measure the distance either via Sion road route or via Ghatkopar road route. The statement, "**After construction of the road**, the site would not be more than 6 to 7 kms. from their present location", is an excellent example of manipulative expertness.

MMRDA in their so called minutes have mentioned things in future tense as, "it **will** develop as a good township", "all necessary civic amenities and facilities **would be** made available", "After construction of the roads, the site **would not be** more than 6 to 7 kms.", and then MMRDA jumps back into present and states, "Thus the infrastructure and the living standards at Mankhurd are much better.....". This is a good play with words and PAP's of Gazi nagar highly appreciate skills of the MMRDA officials to distort the reality and PAP's also pray to God, "May same level of skills be gifted to the MMRDA officials and others in implementing this project as per the policies of the World Bank in real terms which are meant for the betterment of the poor class peoples in the entire World."

Regarding the point that R & R site is close to the Dumping ground, we again say that dumping ground is within one km. air distance from the present R & R site and that the other roads and civic localities can not block the microorganisms, bacteria, viruses, fire smoke, bad smell etc. and the pollution from the dumping ground to reach up to the R & R site.

It is true that there are also several residential areas even around the dumping ground and this fact itself indicates how careless our government and its instrumentalities are with respect to the health of our citizens!

This admitted by the MMRDA itself also shows how the poor people are helpless to live in such degraded environment locality because they come from the rural areas in search of jobs and employment and they have no other option but to take shelter in such areas, as they do not earn enough to accommodation in a better locality. And it is really a pity and shame on part of the government and MMRDA that they are using their helplessness as a shield in their futile attempt to prove their wrong decision of R & R site to such places as correct. We say that such tendencies must be discouraged and plans be made to remove such population from the degraded environment to safe location in the nearby vicinity with their active consultation and participation.

Statement made in the so called minutes of the MMRDA that the dumping ground will not  
.....Contd.page6/-

pose any problem to Mankhurd site is like showing and shouting loudly "SUN" in the full "MOON" night. In reality, the residents near the dumping grounds are opposing it and it is a hot issue nowadays in daily newspapers, which we hope the MMRDA personnel might be reading.

5. Regarding education, we state that no survey has been made about the children of Gazi nagar area with respect to their standards and education language. When the Project Director made a joke of our poverty by saying, "show me how much income tax you pay", despite knowing the truth that we are the slum dwellers, what should we expect more from him by putting our grievances or suggestions.

We deny that we ever requested any visit to R & R site at Mankhurd as we did not want to be shifted to such a distant and polluted area. This is a falsely mentioned and deliberately inserted in the so called minutes by the MMRDA officials.

We further say that while making plans about resettlement we were never consulted otherwise we would have suggested at the time of planning itself to resettle and rehabilitate us in the nearby vicinity. We again say that if we are shifted to any such distant place, our livelihood, our sources of income, our social, economic network and infrastructure all will be destroyed besides dispersing our kin groups. We also suggested closing of the dumping ground and huge open wide drains for the betterment of the public residing there at present.

6. Regarding the collection of Rs. 25/- by SPARC, we say that it is not unique with us only but it is a common malpractice played by them. Their involvement in such corrupt practices could be better understood from the news published in various newspapers that were provided with translation in the meeting. In addition to that we are presently furnishing some more news published recently in leading and reputed news papers viz. "The Asian Age" and "Dopahar ka Samna", which is attached with this letter.

We say that it is now crystal clear to the PAP's of Gazi nagar that SPARC personnel are corrupt, irresponsible and incapable of dealing with any such program and R & R. We firmly mentioned in the meeting that we couldn't bear with SPARC any more as they were not honest towards their duty beside their rude and corrupt nature such as demanding money and forcing us to bring our spouses from our native place nearly 1600 kms. away, otherwise threatening to disqualify for alternate accommodation.

.....Contd.page7/-

It is true that we were neither consulted nor participated during preparation of any plan with respect to the SCLR project and R & R and also that we do not want to be shifted to any distant and polluted place but we requested to be relocated in the nearby vicinity where ample of vacant space is available. Since we do not want to be rehabilitated at Mankhurd, no question arises to visit that site.

With respect to the statement mentioning Shri Raj Awasthi as one of the "leaders", we strongly object to it, as he is not our leader but merely an adviser to whom PAP's of Gazi nagar requested for attending the meeting and the same was also informed in the meeting.

Mr. Raj Awasthi may not be a PAP as alleged in so called minutes, but we have seen ID no.124 marked to his shop in the map prepared by MMRDA itself. Now to whom MMRDA has related his shop can be better known to MMRDA as we know for the last more than fifteen years that the shop carrying ID no.-124 belongs to Mr. Raj Awasthi and his family members. We say that your statement that Mr. Avasthi is not concerned in any way is completely wrong, as he would be affected by a project passing in front of his shop and residence. This is nothing but bad intention of the MMRDA officials towards Mr. Awasthi on personal basis

We would also want to put it to your records that Mr. Raj Awasthi is getting anonymous calls threatening and abusing him in filthy language by the caller claiming themselves related to the International Mafia and warning Mr. Raj Awasthi to keep himself away from the project since he attended the above referred meeting. We, the poor residents were shocked to hear this from Mr. Avasthi. He told us that he would be killed if he tried to lodge complaint with police, as police would not protect him round the clock from the long reaching hands of the Mafia.

We are not able to understand what interests International Mafia has in this project and why they are threatening such an innocent person and targeting him who is only supporting us in our fight for our rights.

However, it was admitted by the World Bank officials that there were serious mistakes in the Resettlement Action Plan and also agreed with the PAP's concern regarding validity of the redressal committees. Mr. Manindar Gill of the World Bank stated in the meeting that the structure of redressal committees also needs to be changed completely for the sake of impartiality and natural justice. He also emphasized the need for independent personalities to

.....Contd.page8/-

act as hearing authority and that hearing authority must be completely independent of the Government or its instrumental agencies. Mr. Gill said that it is completely wrong that at present hearing of the PAP's is done by the authorities against whom the PAP's have their complaints and said that it is totally unfair for respondents to act as hearing authority in any matter and the same is also against the natural justice. Mr. Gill also promised to review it as and where necessary.

We say that the personalities appointed in such redressal committees must be respected persons in their field and we would also like to participate here in suggesting some names of the persons who are known, respected and core personalities of this city with clean image and the persons who know Mumbai city and its various issues very well, if we are given an opportunity.

As stated and repeated many times earlier also, we had been continuously stating that we approached the MMRDA and SPARC and tried to resolve the various issues but all in vain. It seems not to be a case of misunderstanding and confusion in the minds of residents as alleged in you so called minutes but certainly it is a case of open violation of various policies of the World Bank with respect to this project and R & R. The Gazi nagar residents are making complaints regarding the corrupt and irresponsible activities of SPARC and showing various news related to them with respect to this project and other rehabilitation schemes but Mr. T. Chandrashekhar simply ignored. Moreover, no action including criminal charges yet have been taken against the SPARC for the reason best known to the MMRDA and the Government.

The meeting ended with a brief summary of the discussions by Shri Maninder Gill of the World Bank came from Washington D.C.. The PAP's expressed thanks and the Project Director promised to settle the various issues raised by us. But, after reading these minutes prepared by MMRDA, we are too much disappointed as there are so many misleading statement revealing the ugly face of the MMRDA behind polished one. We say that such meetings must be "in camera" to know the truth what actually transpired.

We further say that it may be a prestigious project for the government or MMRDA but our lives and right to life are also more precious than any such project and hence we must not suffer irreparable harm due to negligent and irresponsible acts of the implementing authorities and the Government.



There were so many other things also omitted deliberately from these minutes but we have stated mostly all-important points in our letters to the World Bank, USA and to the Inspection Panel, USA.

In short, we would like to mention here that the article 21 of the Constitution of India provides the citizens their right to life and even the honourable Supreme Court of India has directed the State Government of Maharashtra and BMC with respect to slum dwellers that forcible eviction of the slum dwellers against their will means to deprive them of their livelihood and to their right to work and thus it leads to deprive them from their right to life and hence the same is unconstitutional. The honourable Supreme Court also set the guidelines that forcible eviction and resettlement to far distant places of the slum dwellers is not any solution of the problem of thinning the squatters colony as they would return to their original place for their jobs and employment.

Thus, we say that our request to resettle us in the nearby locality is in accordance with the guidelines and directions of Supreme Judicial Authority of the Land.

**Note : We read the Attendance Sheet carefully and surprised to note that one lady introduced to us as Mrs. Shorlett Banger from the World Bank, Wshington D.C. in meeting, her name is missing in this sheet. Also, nine persons have not signed the attendance sheet.**

Yours Faithfully,

1. Siyaram G. Maurya , Contact No.- 022-2503 90 70  
( President- Hanuman Welfare Society)

S. Maurya

2. Ambkeshwar J. Pandey  
( President- Jai Hanuman Rahiwasi Sewa Sangh)

22 0 21 0 43 12

3. Rattilal T. Gupta, Contact No.-022-2503 85 96  
( Secretary- Jai Hanuman Rahiwasi Sewa Sangh)

Rattilal T. Gupta

4. Dwarika Prasad S. Yadav, Contact No.-022-2503 51 24  
( Secretary- Gazi Nagar Sudhar Samiti )

डी. प्रसाद . यादव

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*Vasudeo Maurya*  
5. Vasudeo Maurya

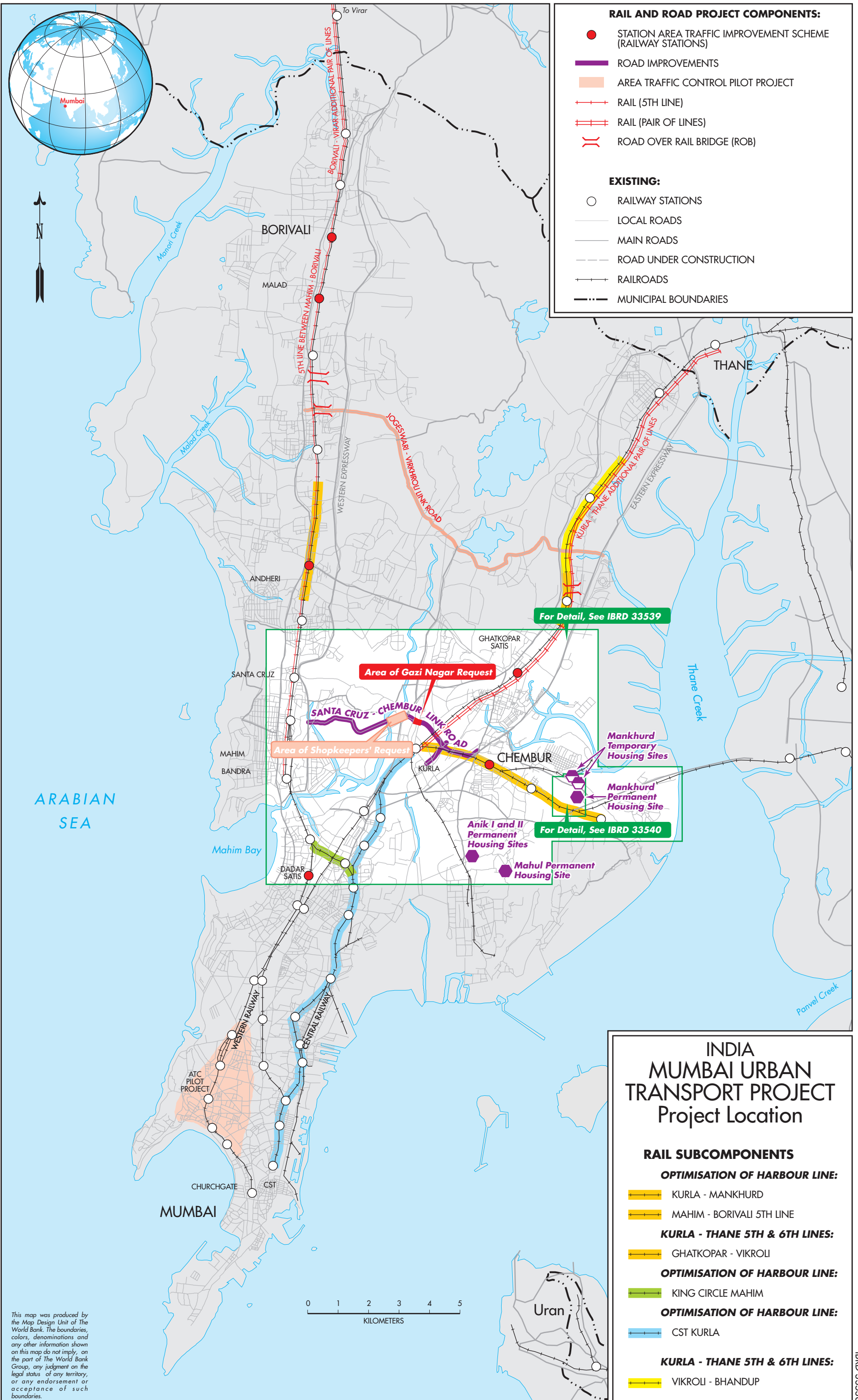
*Bhawnath R. Sharma*  
6. Bhawnath Sharma

*Raj Awasthi*  
7. Raj Awasthi

( All above-mentioned persons were present in the above stated meeting held on 09<sup>th</sup> July, 2004)

Encl.:

1. Minutes of the hearing held on 28<sup>th</sup> May, 2004
2. News published in various news papers regarding corrupt and irregular activities of the SPARC. Misleading minutes sent by MMRDA.
3. Misleading minutes sent by MMRDA vide their letter dated 19<sup>th</sup> July, 2004



**RAIL AND ROAD PROJECT COMPONENTS:**

- STATION AREA TRAFFIC IMPROVEMENT SCHEME (RAILWAY STATIONS)
- ROAD IMPROVEMENTS
- AREA TRAFFIC CONTROL PILOT PROJECT
- +— RAIL (5TH LINE)
- +—+— RAIL (PAIR OF LINES)
- +—+— ROAD OVER RAIL BRIDGE (ROB)

**EXISTING:**

- RAILWAY STATIONS
- LOCAL ROADS
- MAIN ROADS
- - - ROAD UNDER CONSTRUCTION
- +— RAILROADS
- - - MUNICIPAL BOUNDARIES

**INDIA  
MUMBAI URBAN  
TRANSPORT PROJECT  
Project Location**

**RAIL SUBCOMPONENTS**

**OPTIMISATION OF HARBOUR LINE:**

- +— KURLA - MANKHURD
- +— MAHIM - BORIVALI 5TH LINE

**KURLA - THANE 5TH & 6TH LINES:**

- +— GHATKOPAR - VIKROLI

**OPTIMISATION OF HARBOUR LINE:**

- +— KING CIRCLE MAHIM

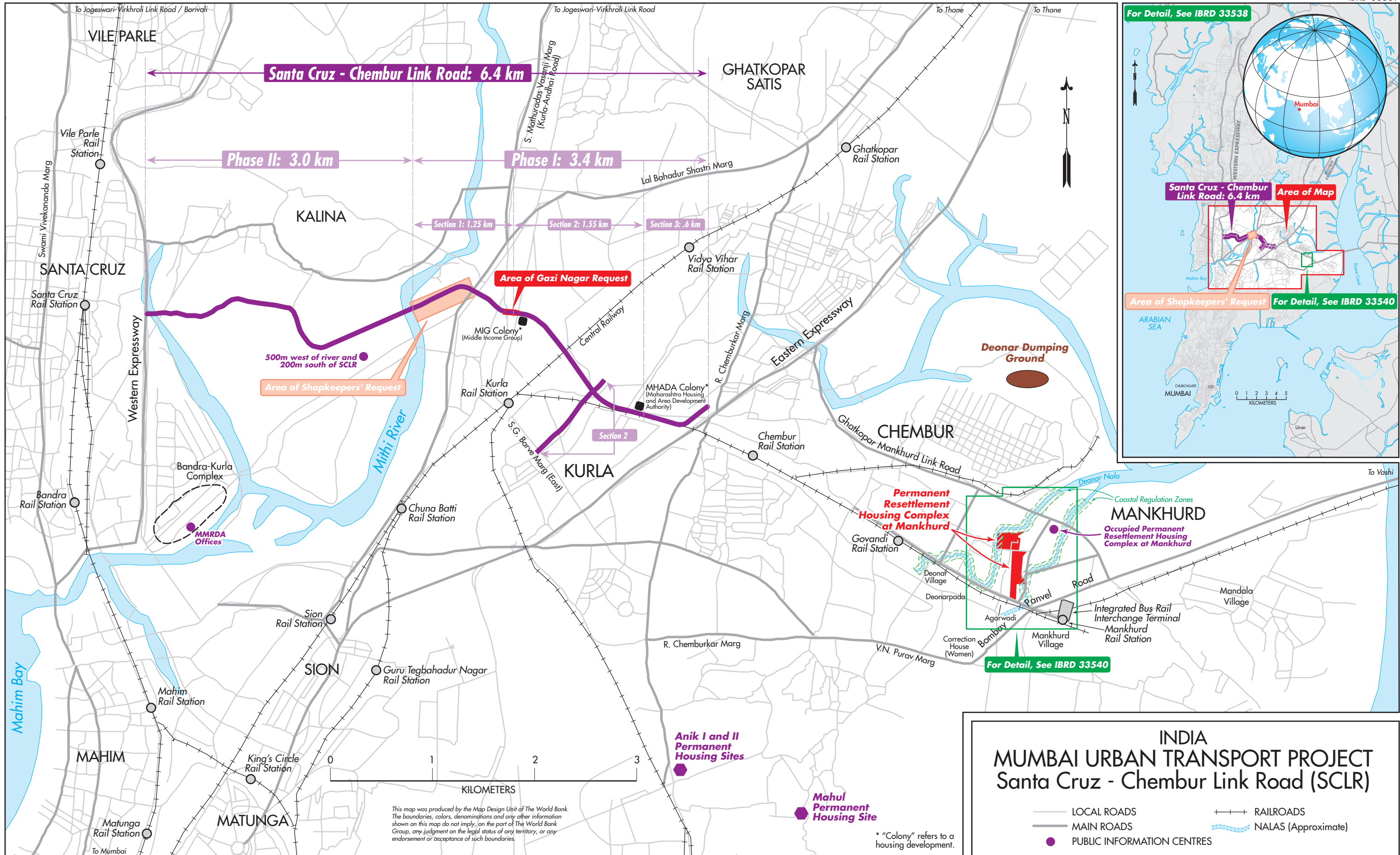
**OPTIMISATION OF HARBOUR LINE:**

- +— CST KURLA

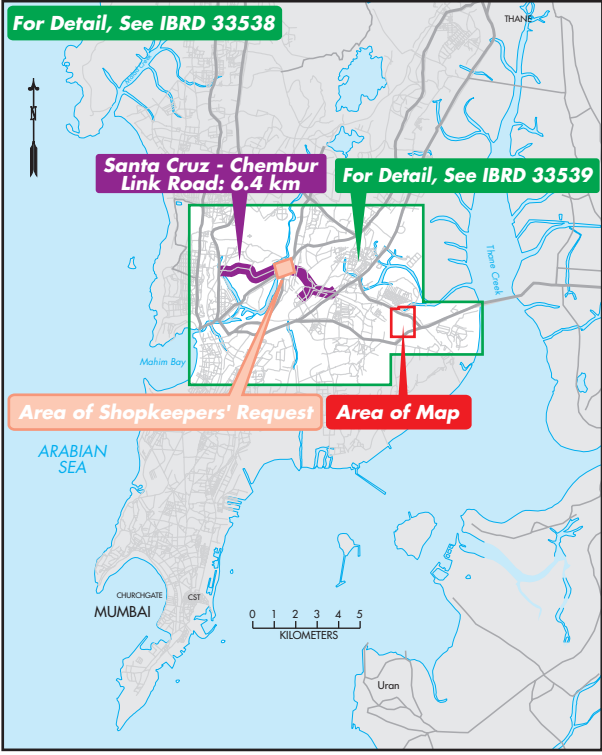
**KURLA - THANE 5TH & 6TH LINES:**

- +— VIKROLI - BHANDUP

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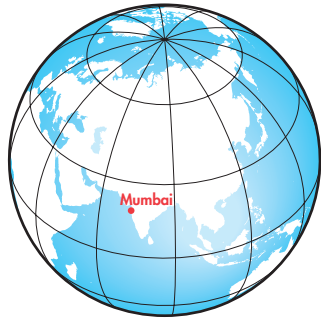


For Detail, See IBRD 33538

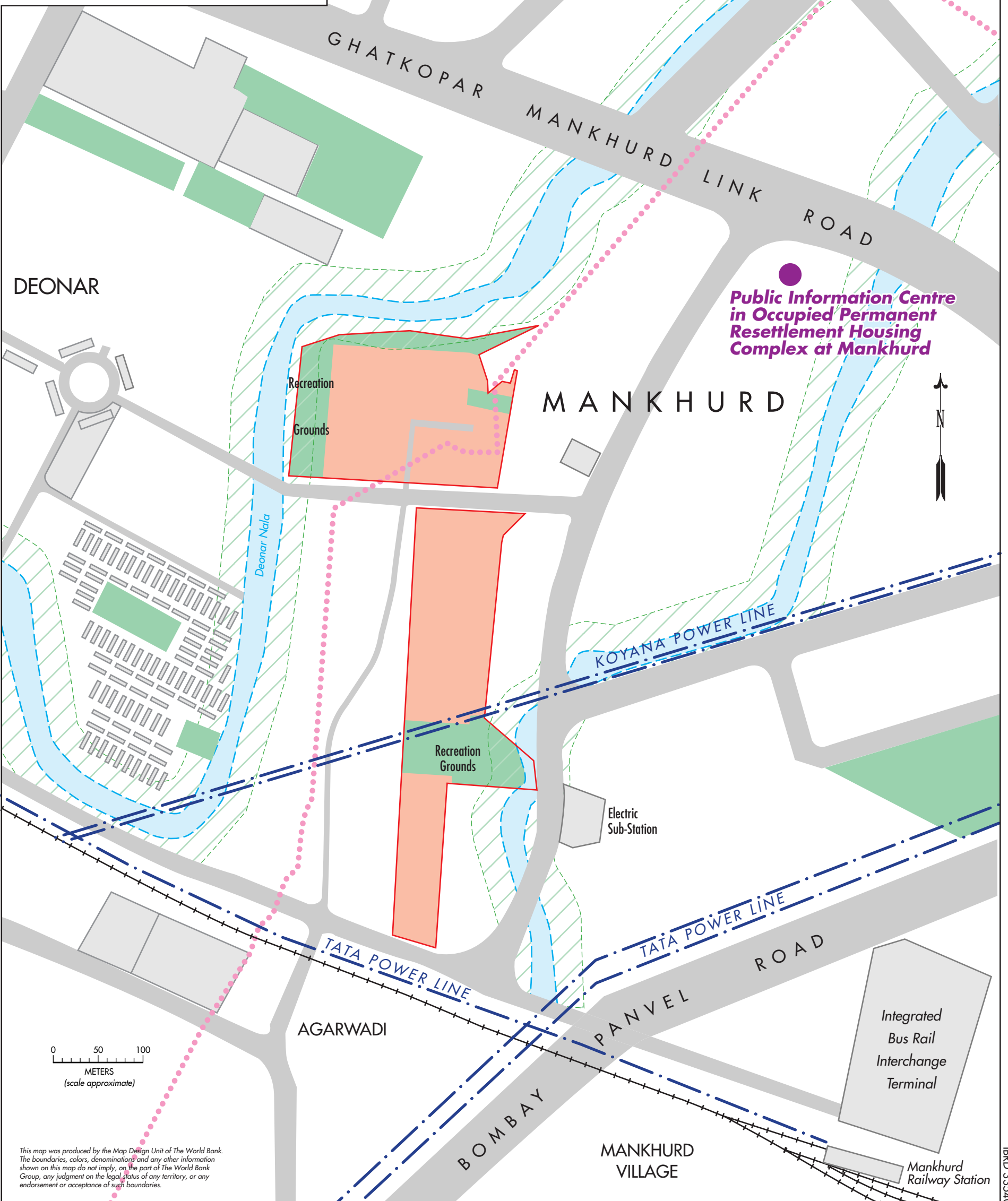


For Detail, See IBRD 33539

# INDIA MUMBAI URBAN TRANSPORT PROJECT Mankurd Site



- PERMANENT RESETTLEMENT HOUSING COMPLEX
- EXISTING ROADS
- RAILROADS
- OTHER BUILDINGS
- GARDENS, RECREATION GROUNDS
- POWER LINES
- WARD BOUNDARY
- NALAS (Approximate)
- COASTAL REGULATION ZONES



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