

Dear Sir or Madam,

**Please Assist Prevent Environmental Disasters That May Follow if Northern Collector Tunnel (NCT) in Aberdares Region-Kenya is Constructed In Its Proposed Form.**

The elevated “water pots”, aquifers in Aberdares, the source of local springs, streams and rivers, are currently in grave danger from permanent destruction, as a result of tunneling action proposed by the project proponent for the Northern Collector Tunnel (NCT). The project proponent has already started work on site, against STOP orders and stop work instructions issued by the National Environment Tribunal (NET).

The elevated “water pots”, aquifers or underground water systems in the Aberdares, like the traditional earthen pots are delicate and once damaged it is virtually impossible to repair. Making tunnel cavity, in some places running 100 meters to 250 meters below natural grounds surface, 11.8km long, would result in permanent damage to the elevated aquifers. Unlike the traditional earthen pots, elevated aquifers in Aberdares, once damaged are not replaceable. The elevated aquifers need to be protected.

An Environmental and Social Impact Assessment (ESIA), **EIA-1188 report was prepared under the direction of the project proponent, which they signed on 4th November 2014.** The ESIA report communicated the following.

ESIA item 7.3.5 and we quote **“Studies have shown that tunnels can lead to drying up of springs and streams leading to severe socio-economic and ecological effects. ...”** End of Quote.

Quote from ESIA item 7.6.1,

“The cumulative impacts at Maragua 4BE01 are expected to include the following:

- Reduced flows as a result of diversion of a majority of the flows originating from the Aberdares at Irati, Gikigie and Maragua intakes to the Northern Collector, resulting in:
- Reduction in the flow reaching Masinga Reservoir and therefore a reduced flow available for hydroelectric power generation;
- **Some short periods or single days with potentially zero flow or near-zero flow.** These periods will normally be preceded and/or followed by further periods with extreme low flow;
- Less flow available for use in existing and future domestic and agricultural activities (e.g. irrigation) in downstream areas.”End of quote.

People downstream of the proposed tunnel, whose streams and springs would dry-up, are not aware that streams, that have served them well in the past, would dry up because of the tunneling action proposed in the ESIA. They have not been consulted nor made aware of grave consequences of the proposed tunnel.

A person who often draws a jar of water from the stream/spring/river, or takes their livestock to water, would be shocked to see a river **with zero-flow**. A dry river bed, in place of the river they knew. Most people who

would be affected are not aware that the rivers would sometimes run dry as a result of the proposed tunneling action.

Proceeding on with construction of tunneling project, where the ESIA clearly communicates, “**Studies have shown that tunnels can lead to drying up of springs and streams leading to severe socio-economic and ecological effects**”, raises questions as to whether the project proponent even bothered to read or consider the work which was prepared under their direction.

Note NCT Construction contract was awarded long before the ESIA document was released to stakeholders for public consultation. Therefore input and concerns of public and stakeholders with respect to environmental issues appear to be of no relevance to the project proponent.

We draw your attention to Murang’a “Report of the Technical Committee on Northern Collector Tunnel Project”, Item A.3.1 and we quote for ease of reference:

**“A.3 FINDINGS OF THE COMMITTEE**

**A.3.1. Limitation of Consultation process**

During EIA consultation, repeatedly in public and other organised forums, the project proponents described an inaccurate situation, and suggested that only flood water will be tapped. The committee observed that;

- i) Flood water is generally defined as flows more than Q80 while NCT-1 will abstract over Q95, which in the proponents own admission will results to conditions similar to flow during prolonged drought.
- ii) Athi Water Services Board disregarded recommendations/caution of their own feasibility studies, indeed the public and stakeholders were not made aware of the precautions

**Therefore, consultation process was technically flawed, hence misleading.”** End of quote.

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**Drop box link** to download ESIA EIA 1188: Copy and paste link on browser or click on it.

<https://www.dropbox.com/s/y3aro4l63teq6bw/EIA%201188-Northern%20Collector%20Tunnel%20Phase%201.pdf?dl=0>

**Drop box link** to download: “Report of the Technical Committee On Northern Collector Tunnel Project”. Also available on Murang’a County Assembly website. **Please refer to section A.3.3.f, b, d:**

<https://www.dropbox.com/s/tikab3llck2tg84/Report%20of%20the%20Technical%20Committee%20On%20Northern%20Collector%20Tunnel%20Project.pdf?dl=0>