



**Law infringements and negative impacts of
the M-30 expansion
REPORT to the MEPs**

Plataforma M-30 No + Coches

June 2006

INDEX

- Introduction, 3

1. Law infringements in the M-30 expansion project, 4

- EU environmental law infringements, 4
- Other irregularities of the project, 6
- Lack of participation and social consensus, 7
- Funding problems, 7

2. Human health risks caused by the M-30 expansion, 8

- Lack of prevention and control plans, 8
- Serious health risks faced by the citizens, 8

3. Effects of air pollution on the health of the citizens of Madrid, 9

4. Impacts to the arboreal heritage of the city, 12

5. Damages to the historical heritage of Madrid, 12

- Casa de Campo, 12
- Damages to Toledo Bridge, 14

6. Impacts to Manzanares River and its associated flora and fauna 14

7. Environmental damages caused by the M-30 expansion works, 15

8. Traffic chaos, 16

9. Main conclusions, 16

- ANEXES, 17

- Arboreal damages, 17
- NO₂ mean annual value in Madrid city 2001-2005, 17
- Mobility in Madrid and M-30, 18
- Motorway oversupply in Madrid, 19
- City planning, 21
- Alternatives, 22

Groups belonging to the Platform M-30 No Más Coches (38 associations):

A PIE; AMIGOS DE LA TIERRA; ASOCIACIONES DE VECINOS COLONIA MANZANARES; ASOCIACIÓN DE VECINOS EL ORGANILLO DE CHAMBERÍ; ASOCIACIÓN DE VECINOS LA FLOR; ASOCIACIÓN DE VECINOS PUERTA EL RETIRO; ASOCIACIÓN DE VECINOS SAAVEDRA FAJARDO; ASOCIACIÓN DE VECINOS Y COMERCIANTES DEL EJE PEATONAL Pº. DEL PRADO, HUERTAS, PLAZA DE ORIENTE; CGT MADRID-CASTILLA-LA MANCHA; CLUB DE DEBATES URBANOS; CONFEDERACIÓN SINDICAL SOLIDARIDAD OBRERA; COORDINADORA DE ASOCIACIONES DE VECINOS DE VALLECAS; COORDINADORA DE MINUSVÁLIDOS FÍSICOS DE LA C.M.; ECOLOGISTAS EN ACCIÓN; IZQUIERDA CASTELLANA; IZQUIERDA UNIDA COMUNIDAD DE MADRID - GRUPO MUNICIPAL IU; JÓVENES VERDES; JUVENTUDES SOCIALISTAS DE MADRID; LOS VERDES; MADRID CAMINA; NO NOS RESIGNAMOS; PARTIDO SOCIALISTA DE MADRID-GRUPO MUNICIPAL SOCIALISTA; PEDALIBRE; PLATAFORMA AFECTADOS NUDO SUR; PLATAFORMA DE COLECTIVOS DE ARQUEOLOGÍA; PLATAFORMA NO A LA TALA; PLATAFORMA PARQUE EUGENIA DE MONTIJO; PLATAFORMA POR LA RECUPERACIÓN DE LA CUENCA BAJA DEL MANZANARES; PLATAFORMA SALVEMOS LA CASA DE CAMPO; PLATAFORMA VECINAL ANTONIO LÓPEZ-PUENTE DE PRAGA; PLATAFORMA VECINAL AVDA. MANZANARES-ERMITA; PLATAFORMA VECINAL BARRIO CASA DE CAMPO; PLATAFORMA VECINAL PARQUE DE LA CORNISA-VECINOS DE LAS VISTILLAS; RED PROSPERIDAD; RESIDENTES DE LA GUINDALERA-PARQUE DE LAS AVENIDAS; UGT-MADRID; UJCE; USMR-CC.OO.

INTRODUCTION

This document explains the main reasons why we, the citizens of Madrid, reject the City Council M-30 expansion project, and it supports our actions to demand a more sustainable solution to organize life in the city.

The Madrid M-30 urban motorway, built in the 70's, is a 32 km ring road that encircles the centre of the city and runs next to it most of the time. It crosses several neighbourhoods and in some of them the carriageway is hardly 10 metres away from the houses.

Instead of several progressive actions aimed at dismantling this urban motorway and solve the serious environmental and mobility problems it causes, the City Council has chosen to consolidate it as a high capacity motorway at the expense of increasing environmental pollution and destroying the tree, archaeological and landscape heritage of the city.

To increase its capacity, some sections now have 6 instead of 3 lanes in each direction; it has more junctions to access the centre and new tunnels to connect it to other motorways.

The M-30 works have very negative short, medium and long-term impacts on the standard of living of the citizens and it determines the sustainable evolution of mobility in Madrid. Besides, it infringes several Spanish laws as well as various European Directives on public participation and information, health protection and environment protection.

Therefore, we demand that, after its visit to Madrid, the delegation of the European Parliament encourages Spain to pass an immediate moratorium on the expansion works whilst the mandatory environmental impact declaration is prepared, and measures are taken to guarantee that the EU regulations are enforced.

1. LAW INFRINGEMENTS IN THE M-30 EXPANSION PROJECT

1.1.- EU environmental law infringements

The M-30 expansion works have moved away from the goals set by the Community Action Programme by applying EU environmental Directives incorrectly. For example:

- It has not carried out a Strategic Environmental Assessment including a study of alternatives.
- It has not carried out an Environmental Impact Assessment, given that the project has adverse effects on the environment.
- It has not informed the public sufficiently and the deadlines to lodge amendments or propose alternatives have not been adequate, neither before nor during the implementation of the project.
- To avoid mandatory procedures, the works have been split, in an arbitrary manner, into more than 20 sections.
- No study of the overlapping of these works with other projects at the same points has been carried out.

Response to the main local government arguments

a) “The Environmental Impact Assessment (EIA) is not necessary because it is an urban area”.

The arguments held by the European Commission letter of formal notice contradict this hypothesis for two reasons:

1a) Regarding the motorway transformation projects:

The Commission declares that the works fall within the scenarios contemplated in Annex I and II:

“Given that the project involves new constructions, particularly the construction of new tunnels... it would be possible to include this project in Annex I”. “Even admitting that this project cannot be compared to the construction of a new motorway, it would certainly be a project of modification or expansion of existing infrastructures, as contemplated in Annex II”. “All this regardless of the fact that currently the M-30 is rated as urban road (...). It is important to mention that this rating by virtue of Spanish law is not a determining factor in the EU law”.

As a result, Directive 85/337/EEC is fully applicable.

2a) Regarding urban planning projects:

In the case 2001/5061, regarding Operation Chamartín, with identical characters and similar objective, the Commission already understood that, on the basis of a global appraisal, under no circumstances works carried out in urban areas can be considered to be free of important environmental impacts. Among other factors that must be considered when assessing the environmental impact of a project, Article 3 of the Directive includes: human beings, fauna and flora, material assets and the cultural heritage.

It is reasonable to think that this kind of projects can have significant effects on the environment, understood in the wide sense expressed in Directive 85/337/EEC, due to increased traffic, noise, pollution, the impact on the artistic heritage or any other reason. Because of this, the relevant authorities should determine whether the implementation of such works can have significant effects on the environment, and in that case, they should subject them to an assessment in accordance with Articles 5 to 10.

b) “Neither the law of the Autonomous Community of Madrid nor the basic law of the state require an EIA”.

With regards to issue 2001/5061 (Operation Chamartín), the Commission considered that the Spanish authorities should have determined the need to subject the project to an impact assessment procedure, as it was a big scale urban project. Since they failed to do it, it was decided that Articles 2.1, 3 and 4.2 as well as Articles 8 and 9 had not been applied correctly in relation to Annex III and point 10, b) in Annex II of the Directive. This incorrect application has been repeated consciously in the case of the M-30 expansion project.

Point 2 of the Report of the Council of State stated that according to Article 6 of Law 2/2002 of Environmental Assessment of the Autonomous Community of Madrid, the Community Government “will be authorized” to subject plans, programmes and projects involving environmental risks or significant consequences for the environment to the mandatory procedures included in this law.

Therefore, both resolutions, recognizing the inadequacies of national Law, far from supporting the City Council argument, reiterate the need to give priority to the application of European regulations.

c) “The current law of the Autonomous Community of Madrid guarantees controls that are more demanding than those contemplated in the EIA”.

On the contrary, in the case of Operation Chamartín, the Commission considered that the environmental control guaranteed by the law of the Autonomous Community of Madrid “does not replace or cancel” the obligation to determine the need to subject to an environmental impact assessment certain projects that, because of their characteristics, according to selection criteria established in Annex III of Directive 85/337/EEC, modified by Directive 91/77/EEC, can have a significant effect on the environment and, especially, on the factors mentioned in Article 3 of the Directive.

Another fact that proves that the alleged controls put forward by the local Government either do not exist or are insufficient is that the Confederación Hidrográfica del Tajo, responsible for the Manzanares River, has been forced to initiate 9 inquiries due to serious or very serious infractions that affect the environment.

1.2.- Other irregularities of the project

1.2.1.- Malicious behaviour

The politicians involved in the events that led to the Report of the European Commission (Operation Chamartín and Ciudad Deportiva del Real Madrid) are the same involved in the M-30 expansion project: The President of the Autonomous Community of Madrid, that avoided the environmental impact assessment in the mentioned cases, was the current Mayor of Madrid, Mr Alberto Ruiz Gallardón. The Councillor of the Environment of the Community (that lodged unsuccessful pleadings in the name of Spain) Mr Pedro Calvo is now City Councillor of Mobility in Madrid; and the current city councillor of urban policies Mrs Pilar Martínez was also a member of the Autonomous Community Government in those days.

These facts clearly indicate that:

- a) These politicians know very well the EU requirements, and the pleadings they lodged at the time to justify the operations censured by the European Commission were inappropriate.
- b) The persistent use of the same pleadings in relation to the M-30 expansion is clearly malicious and implies a new attempt to ignore European law playing with decision deadlines and with the irreversibility of facts, knowing that eventually the more than likely European penalties will not fall directly on the City Council but on the Spanish State.

1.2.2.- Connivances of the actors

There are multiple irregularities in relation to the procurement. For example, the environmental impact study has been carried out by the Universidad Politécnica de Madrid, which is a consultant of the company Madrid Calle-30 and author of several of the tunnel ventilation projects.

1.3.- Lack of participation and social consensus

There was just a 20-day period to lodge pleadings in relation to this big scale project (the minimum required by law). The information provided by the City Council to the public was incomplete and was so fragmented that it was impossible to have a full and exact idea of the final project. The Colegio de Arquitectos de Madrid (association of architects) lodged a complaint because of this. This initial deficiency was never corrected, quite the opposite, the lack of information has become worse, since numerous changes have been made to the project but the public has not been informed, and the changes have not been subjected to pleadings even though some of them had a big impact on the environment.

The project was approved by the local Government with the opposition of the other parliamentary groups and neighbourhood associations. Hundreds of pleadings lodged at the time by these groups were totally rejected as a block. Suggestions from citizens have been systematically rejected, except some aspects of minor relevance.

1.4- Funding problems

The initial estimated cost was € 4,171,011,179.60. This amount did not include the modifications made to the projects, contingencies or the financing cost at 35 years. Some financial organizations estimate that the final cost will be well over € 10,000 million. The City Council has now acknowledged budgetary deviations over € 100 million.

The European Commission has requested the European Investment Bank (EIB) not to authorize the payment of the € 1,500 million loan initially granted to the City Council subsidiary company, Madrid Calle 30, until the infraction proceedings based on the absence of an environmental impact assessment are closed.

Madrid City Council has the biggest debt of all city councils in Spain (more than € 2,888 million, 150% more than when Gallardón, the Mayor, took office). The total debt exceeds the legal limit (110%) established by the Local Finance Law

and goes up to 160%. This debt seriously compromises many social needs that the City Council is obliged to provide.

2. HUMAN HEALTH RISKS CAUSED BY THE M-30 EXPANSION

The M-30 expansion works are being carried out in densely populated areas, few metres away from houses, schools, nurseries, parks, old people's homes, health centres and work centres.

2.1.- Lack of prevention and control plans

The City Council has not fulfilled its responsibility with regard to several aspects related to the health of the citizens directly affected by the works.

- a) It has not developed a plan to prevent the negative impacts of the works over the health and security of the citizens, nor has it adopted any special measures to protect the most vulnerable people (under aged, old people, sick people, disabled people, etc.).
- b) It has not informed the citizens at any stage or by any means of the negative sanitary consequences of the works so that they would be able to take additional prevention measures.
- c) It has not fulfilled its responsibility to enforce the laws that protect human health, and has left the citizens completely defenceless in front of environmental aggressions and abuses and the limited mobility caused by the building companies.
- d) It has not carried out a reliable prior study of control, filtering and dispersion of pollutants to the atmosphere during the works and once the tunnel ventilation shafts are finished.

2.2.- Serious health risks faced by the citizens

The works have caused numerous situations where the health and security of the citizens have been seriously affected, for example using heavy machinery just few metres away from houses during 24 hours a day, placing dumps in residential areas, generating huge amounts of dust, etc. The combined effects have raised the level of pollutants to more than twice the maximum level allowed by Spanish and European regulations.

- a) The works generate noises over 84 dB 24 hours a day, as in many places there are also night and weekend shifts which systematically violate Spanish and European regulations (see Annex).

- b) An imprecise increase in respiratory, pulmonary, cardiovascular, hearing and stress conditions as well as psychical fatigue has been recorded in the areas surrounding the works. The City Council has not monitored this increase nor has it adopted any preventive information and control measure (see Annex).

3. EFFECTS OF AIR POLLUTION ON THE HEALTH OF THE CITIZENS OF MADRID

Data about the increase in people affected by diseases related to pollution prove that the increase in pollution in our region is due to an increasing use of cars, which affects the standard of living of the citizens of Madrid.

According to a recent study carried out by the Ministry of the Environment, around 3,000 people in the region of Madrid suffer a premature death due to environmental pollution. According to a recent study carried out by the Harvard School of Public Health, pollution increases the risk of death by 32% in the case of diabetics, 28% in the case of chronic obstructive pulmonary disease, up to 27% in the case of heart conditions and around 22% in the case of inflammatory diseases such as rheumatoid arthritis or lupus, with an exposure of just two years to concentrations of PM₁₀-this is, particle matter less than 10 microns in diameter (smoke, dust, toxic chemicals from factories or carbon monoxide from vehicles)-over 10 microgrammes per cubic metre. We must not forget that currently the legal danger level for human beings is 50 microgrammes, five times higher.

3.1.- Air quality

3.1.1. Legal framework for air quality

The most relevant EU regulations include Directive 96/62/EC (called mother directive), which sets the pollutants that should be measured, the systems to carry out measurements and the obligation to nominate authorities in charge of ensuring air quality and informing the public. Several daughter directives were drawn up afterwards (including Directives 1999/30/EC and 2000/69/EC) to set the limits for each relevant pollutant. None of these Directives was transposed into our national law within the agreed deadline, and there was even a court ruling against the Spanish Government because of this. Royal Decree 1073/2002 (18th October) including the obligations of the first two daughter directives was eventually approved. According to this Royal Decree, the Autonomous Region Governments are the authorities in charge of looking after air quality in their respective territories, although there are some exceptions, such as the city of Madrid, where the authority in charge is the City Council.

3.1.2.- Air quality in the city of Madrid

As far as air pollution is concerned, there are two pollutants that exceed limit values: nitrogen dioxide (NO₂) and particle matter less than 10 microns in diameter (PM₁₀). Apart from these two, there is another pollutant that exceeds the limit values: ground-level ozone (O₃).

NO₂

As shown in the Annex, Madrid has exceeded the legal limit (limit value + tolerance range) every year, and is well above the limit value of 40 µg/m³ that must not be exceeded in 2010. Every year the gap between the annual average value recorded in the city and the legal limit grows wider. In other words, every year Madrid is further away from meeting the limit value.

PM10

In the case of PM₁₀, the daily limit for the protection of human health set at a daily average of 50 µg/m³ is exceeded more than 35 days a year since 2005. The data recorded by the air quality measurement network indicate that in 2004 the limit was exceeded 47 times, and 65 times in 2005. At some points in the city the limit value is exceeded over 100 times a year (5 stations in 2005).

Ground-level ozone (O₃)

O₃ generated by pollutants released in the city of Madrid is the reason why the warning threshold at which the population should be informed is exceeded multiple times in several localities of the Autonomous Community of Madrid. Every year the level is exceeded multiple times in many localities of this Autonomous Community.

3.1.3.- Air quality and health

Multiple studies indicate that pollution levels currently recorded in Madrid have a serious impact on public health. The APHEIS programme (Air Pollution and Health: A European Information System) findings released in 2004 indicate that in the case of Madrid 83 premature deaths (or 3 deaths per 100,000 citizens) could be prevented annually if the PM10 levels of every day with higher values were reduced to 50 µg/m³, 1,699 deaths (or 58 per 100,000 citizens) if the PM10 annual daily average was reduced to 20 µg/m³, and 526 deaths (or 18 per 100,000 citizens) if the PM10 annual daily average was reduce by 5 µg/m³.

To give an idea of the scale of the problem, the annual rate of 18 premature deaths per 100,000 citizens is almost four times the AIDS mortality rate in the countries investigated, 2.6 times the leukaemia rate, 1.6 times the suicide rate and 1.5 times the car accident rate.

3.1.4.- European Commission Warning

On 8th July 2004 the European Commission sent a first warning to nine States, including Spain, because they had not submitted pollution reduction plans by the agreed deadline (31st December 2003). The warning was based on data corresponding to the year 2001 submitted by the relevant States, and in the case of Spain it specifically mentioned that Madrid exceeded the annual NO₂ average value. In spite of this, Madrid City Council has not implemented any pollutant control and reduction plan.

3.1.5.- Air quality and the M-30

Given that the main source of air pollution in the city of Madrid is on-road traffic, any effort to reduce pollution levels should involve the reduction of the use of cars in the city. On the contrary, a project aimed at increasing road capacity in the city centre, such as the M-30 expansion project, will worsen the already poor air quality in Madrid.

4. IMPACTS TO THE ARBOREAL HERITAGE OF THE CITY

Because of the expansion works of the M-30, many green zones have been lost or injured, including historical promenades and gardens, other gardens, neighbourhood parks, linear or peripheral parks, traffic islands, etc.

The surface directly afflicted by the M-30 works (792,653 m²) and other related works (74,940 m²) sums up to 859,593 m² (about 86 hectares) (See annex).

A total of 12,962 trees and shrubs have been felled, 6,454 have been transplanted (the majority of which could not survive) and only 235 specimens have been preserved. Many of the destroyed trees were adults and some of them were more than 100 years old. The direct damage of the cuttings is worsened by the additional costs provided by the diminishing of CO₂ absorption, the damage to the landscape, the increasing noise, the impacts for life beings dependent on trees, etc.

At the moment the felling continues e.g. in the Casa de Campo, at the Puente de los Franceses (French's bridge), in the Arganzuela, in the Tierno Galván park, Lineal Manzanares' River park and at other zones near the Nudo Sur.

It is remarkable that some of those cuttings were not justified by the project, but were made in order to facilitate the machinery movement or the placement of the logistic centres of the companies involved in the works (work offices, warehouses, etc.), which highlights the subordination of the arboreal heritage under the particular interests of the construction companies.

5. DAMAGES TO THE HISTORICAL HERITAGE OF MADRID

5.1.- Casa de campo.

The Casa de Campo should enjoy the strictest protection, as it was declared National Monument by the II Republic (1931-1936) and is considered Cultural Interest Item (Bien de Interés Cultural; BIC) after the Patrimony Act promulgated in 1985.

The bury works of the M-30 motorway and its connection with the A-5 motorway severely damage the Medicinal Plant Garden and the immediate surroundings of the Vargas' House, which are the places with the highest historical and art values of all the park.

Consecutive inadequate projects and a careless perform of the works have caused damages of diverse magnitude in the park. The works, besides, haven't

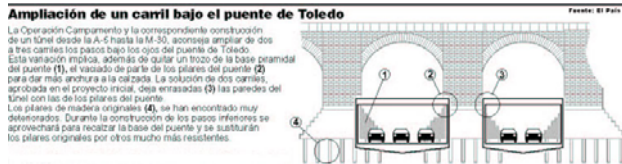
been included in a director plan for the recovery of the ornamental gardens in the Casa de Campo. The main damages are the following:

- Land invasion of the BIC corresponding to the so-called “Medicinal Plant Garden”. Large concrete expansions will condition the landscaping done on its surface. Works have also damaged the remains of the Juan de Villanueva Stables building.
- Destruction of more than 100 metres of fence at the medicinal plant site. Made in the 1950’s, it is made of forged iron and granite and has constituted the image of the Casa de Campo from the River Gate (Puerta del Río) till the Alto de Extremadura. Some proposals eliminate the fencing, thus causing the segregation of a part of the BIC.
- Burial of a landscaping garden of the early 20th century. It consisted of a curved pond surrounded by palms, with a granite fountain, an artificial creek and some decorative elements. It is one of the few remaining gardens from that time (before the II Republic) that has been preserved.
- Impact to the Connection Road to the Royal Sites. Made by Juan de Villanueva in 1811, it linked the Casa de Campo with the Royal Palace. The west entrance of the José Bonaparte tunnel, with republican ornamentation (XIX century), has been buried under concrete plates in a probably irreversible way.
- Trench built next to 200-year-old plane trees at the River Gate (Puerta del Río). Those singular plane trees have a high natural value as being part of Villanueva’s design of the Connection Route of the Campo del Moro and Casa de Campo Royal Sites.
- Invasion of the ancient Reservado Grande. A 10 m wide longitudinal strip worsens the land losses caused by the construction of the M-30 in the 70’s.
- Club de Campo fence. The construction of flow regulators for Antequina and la Granjilla creeks has caused the regrettable destruction of six fragments of the Royal Site’s old fence.
- Demolition of one half of a forged-iron gate. A bulldozer has accidentally caused the demolition of one half of a forged-iron gate and its metallic arch, with republican style ornaments.

5.2.- Damages to Toledo Bridge.

Toledo Bridge, erected in 1719 by Pedro de Ribera, is one of the most affected BICs in Madrid by the M-30 works. Modifications from the initial project done by the city council are going to cause major damages in the structure of this baroque style bridge.

Initially, it was planned to place 2 lanes under every span, but a further lane has been included, this decision not having been told to the Patrimony Office. As a consequence, the piers between every span are being cut and some fragments of the bridge have been cut off, so the precondition of conserving the monument's integrity has not been observed.



At the same time, the southern support of the bridge is being bored-through by a large sewer. Again, no permission was requested to the Patrimony Office.



6. IMPACTS TO MANZANARES RIVER AND ITS ASSOCIATED FLORA AND FAUNA

The banks of the Manzanares River that have been affected by the works (some 6 km) have been destroyed. In many stretches, concrete platforms have been made in order to allow the traffic go on the riverbed. The features the river had from nature, although already modified, have been now fully eliminated, making the destruction of the natural banks irreversible.

All the river's fish community (mainly carps) is now dead and the birds (ducks, geese, gulls, etc.) had to leave. The existing natural vegetation has fully disappeared. On the other hand, all vegetation next to the river has disappeared, victim of the cuttings and heavy machinery usage.

The preservation of the river's flora and fauna is a condition demanded by the work's authorization of Madrid's regional government (Comunidad de Madrid). The compliance of those requirements has neither been respected by Madrid's City Council nor deserved punishment or even surveillance by Madrid's regional government.

7. ENVIRONMENTAL DAMAGES CAUSED BY THE M-30 EXPANSION WORKS

There are two main facts that imply the worse negative consequences of the M-30 expansion works:

- a) M-30 expansion will allow an increase of traffic of 200,000 vehicles per day, which will promote the usage of private transportation in all trips, not only in the M-30. Experience shows that all new traffic infrastructures attracts more cars, so in a short time the problem that had to be solved gets worse.
- b) M-30 expansion will increase the flow of cars into the city centre.

Both factors will increase the population trip towards the periphery, which will be followed by an uncontrolled increase of population in the neighbouring urban centres, the isolation and destruction of ecosystems, the increase of pollution and waste production, the appearance of barrier effects, etc.

Air pollution, far from diminishing, will increase in the same proportion as private transportation. In the area where the motorway will be buried, the pollutants will emerge in a higher concentration through chimneys and ventilation pits next to residential areas, whose inhabitants will suffer the consequences of pollution even more than now. In the other 26 km (which are not going to be buried), air and noise pollution will also increase from the current levels.

8. TRAFFIC CHAOS

During the works, the traffic in Madrid, that had severe problems before, has gotten worse. Even though the urban mobility studies discouraged the performance of different works that affect traffic, the M-30 works are overlapping with other major urban works, the accumulated effect being very important. Due to the lane reduction in the M-30, any small incident means large traffic-jams with a much higher frequency.

In this sense, social and economic losses associated with the works have not been quantified: security/accident rate in the transport sector, additional work and leisure time invested exclusively in transport, health consequences, etc.

9. MAIN CONCLUSIONS

M-30 works are a direct attack to the health of tens of thousands of European citizens that live in Madrid, with a statistically quantifiable cost in terms of premature mortality and with a cost for a valuable urban ecosystem such as the river. In the same way, once the works are finished they will have opposite consequences from what they theoretically pursue, i.e. rise of pollution and traffic and worsening of the life quality of Madrid's inhabitants.

This is why the institutions that have the authority to safeguard the basic citizen rights, must express their disagreement against the conscious infringement of the guarantees that protect the health and welfare of the citizens.

We understand that the delegation of the European Parliament which will inspect the M-30 expansion works should allow a moratorium of the works until the compulsory Environmental Impact Assessment is done, thus allowing the participation of the citizenship in affairs that absolutely are of its interest: the current and future health protection of the citizens, and city mobility model they wish to have.

ANEXES

ARBOREAL DAMAGES

PROJECT	ACTUATION				
	Felling	Transplant	Special transplant	Conserve	Protective pruning
WIDENING SERVICE ROADS	1094	244	1		
PORTUGAL AVE.	431	171			
SAN LUIS AVE.	6	9			
SOUTH BY-PASS, N TUNNEL	359	404			
SOUTH BY-PASS, S TUNNEL	1204	801		31	
COLMENAR ROAD	560	216			
EMBAJADORES STR.- M-40 CONNECTION	1180	1229	2	7	55
COSTA RICA JUNCTION	207	61			
N-2 JUNCTION	687	234			
N-3 JUNCTION	1762	527			
LA PALOMA JUNCTION	375	52			
O'DONELL JUNCTION	888	509			
O'DONELL TUNNEL ENLARG.	10	15			
MANZANARES R. SECT I	666	377	40	20	
MANZANARES R. SECT II	789	267	3	101	
MANZANARES R. SECT III	757	454	31		
MANZANARES R. SECT IV	1367	349	15	11	
PÍO XII TUNNEL	341	56	5		
VENTISQUERO CONDESA	279	382			
TOTAL (Number of TREES)	12962	6357	97	170	55

NO₂ MEAN ANNUAL VALUE IN MADRID CITY 2001-2005

Year	Legal limit to be applied each year (Limit value + Margin of Tolerance) ($\mu\text{g}/\text{m}^3$)	NO ₂ mean annual value (Network mean) ($\mu\text{g}/\text{m}^3$)	Difference ($\mu\text{g}/\text{m}^3$)
2001	58	63	5
2002	56	62	6
2003	54	59	5
2004	52	61	9
2005	50	62	12

Depicted values in table represent total means in the network. The problem gets worse in some city areas. Some stations have remarkably higher yearly means (over $80 \mu\text{g}/\text{m}^3$, which doubles the limit value for 2010).

MOBILITY IN MADRID AND M-30

Madrid is a city beyond its traffic capacity, which frequently has collapse situations in its streets, with severe air and noise pollution problems.

The last Mobility Poll in 2004 shows that Madrid Region population has grown from the last poll in 1996 in 13.87%, while the trips by vehicle have increased in 51.99%.

The travel in public transportation has decreased in 4,5% while the travels in private vehicle have increased in 4,5%. Inside the city a total of 3,030,317 trips per day are made, while there are 1.001.105 travels that originate from other parts of Madrid region, including neighbouring urban areas.

The travels inside the city have decreased slightly, but those that link the city with the neighbouring urban areas, the rest of the region and the exterior have increased. In this sense, to increase the carrying capacity of existing infrastructures for private transportation makes no sense and contributes to increase transport unsustainability.

The current M-30 is a motorway inside the city centre collapsed 7 h per day and saturated another 5 h. 270,000 vehicles use it every day at several stretches, the motorway promotes car usage and it is a barrier between neighbourhoods, making the short-range movements difficult.

The main aim of the project, following the City Council, is the expansion of the motorway's carrying capacity, as it is described in the own M-30 improvement program.

All works in the M-30 expansion lead to this purpose:

- The increase in the number of lanes in the main carriageways.
- The doubling of the lane number by tunnels.
- The connection tunnels of Madrid city centre (the "central almond") with the motorways that give access to the city.
- The simplification of junctions and the expansion of service roads.
- The creation of new stretches running parallel to already existing stretches ("by-pass" North and "by-pass" South).

All those works cause that the present functionally diversified stretches of the M-30 (such as Ilustración Avenue, the Abroñigal Creek and the Manzanares River), far from consolidating their features as articulation avenues of their neighbourhoods, turn to function as a continuum ring more like the M-40 motorway (a wider ring-road surrounding Madrid).

This capacity increase is being made without studying the additional pressure it will mean to the streets inside the city, with no calculations neither on the attraction effects for new users (= induced traffic), nor on the invitation to usage it means for the traffic that currently uses the M-40.

In summary, the project does not answer to real needs shown by the usage of the M-30, where an increasing importance of short-distance movements has been observed. To extend the M-30 means to worsen the city's mobility model by increasing its traffic capacity, which will increase the number of trips by private vehicle in the city centre and city periphery from neighbouring areas.

It does not exist any reliable study on accident rate associated with the 62 km-long new tunnels, with their associated preventive measures.

MOTORWAY OVERSUPPLY IN MADRID

Madrid City Council claims that the M-30 expansion will benefit pollution, noise, traffic fluency, etc. However, all argumentation on this subject relies on severe approach mistakes and on a model which experience has repeatedly shown to be wrong.

The City Council's approach is wrong because, just as recognized by Mr. Javier Bustinduy Fernández, the engineer responsible for the traffic flow assessments included in the Traffic Study of the M30 enlargement project, the number of vehicles will grow at the same ratio after the enlargement as it did before the enlargement. Thus, there would be a car increase of 2% every year, the same rate observed in the last years in the M-30 and therefore thanks to the expansion there will be an increase in traffic fluency, less emissions of pollutants and greenhouse effect gases, lower accident rate,...

However, things do not work that way: the experience, in Madrid and elsewhere, shows that any road expansion is followed by an intense calling effect and stimulate more traffic that soon collapses the road and causes global traffic to rise. This same argument used for the expansion of the M-30 was also used for the construction of the M-40, a wider ring road in Madrid, foreseeing a long-term saturation. Instead, saturation of the road took place in three years, and today is one of the most congested roads in Spain.

In fact, the "calling effect" is already noticeable. Some of the M-30 works already open to traffic, as the tunnel, are causing an important traffic attraction that has caused the O'Donnell circulation around the Alcalá Gate to be altered this summer.

The real situation is that creating or expanding infrastructures generates more traffic and switches the critical spot- with higher congestion- from some parts of the city to different ones. In addition, new infrastructures usually facilitate circulation at high speeds between congestions at the origin point and those at destiny points, through a longer route than before. Combination of these four factors -more traffic, more congestion, higher speed, and longer distance- yield higher fuel consumption than before. Therefore, greater emissions of pollutants and greater health problems for the population will take place.

On the other hand, Madrid is today the city area in Europe with more motorway km in relation to its population. The following table allows the comparison with other metropolitan areas (data from IAURIF, Institute for Urban Planning and Metropolitan Area Development in Paris).

	Motorway km per million inhabitants
Berlin-Brandenburg	137
Paris	71
London	43
Madrid	174

It is in this framework where the giant expansion of the M-30 should be put: an absolutely counterproductive intervention in a city already overwhelmed with traffic infrastructures, that will allow the increase of the daily traffic in more than 200,000 vehicles.

CITY PLANNING

The expansion project pretends to convert the M-30 in a new traffic distribution route to the whole metropolitan region. It lies on a city model where big road links aimed for private traffic connect, in a quick way, far-distance targets. This model is completed by other infrastructures accomplished in Madrid neighbouring area, such as the new radial motorways, the M-45 motorway, the M-50 motorway, the conversion of the M-501 route into a four-lane motorway, etc.

An obsolete way of urban planning and growing is thus promoted, characterized by residential areas consisting in houses, placed outside the city. However, such model has already been left behind in other European Countries. The consequences for the citizenship welfare and for the environment are remarkable:

Life conditions:

- The car becomes essential for any trip.

- Since the car receives a high priority treatment, the city becomes an unattractive place to live in, due to worsening living conditions of inhabitants.
- People that live in the metropolitan area have to travel daily by car, which originates a loss of time, an increase of nervousness, stress, and an increase of the accident rate.
- The social life in the residential neighbourhood becomes difficult because of the low density, and again the car becomes essential to cover any need.

Environment:

- A broader expansion of terrain is needed to supply necessary services; so many ecosystems are isolated, fragmented or destroyed.
- An increased amount of resources (construction materials, fuel, energy, etc) is needed for the maintenance of roads, housing, shopping centres, heating, water transport, etc.
- Water consumption is increased in these residential areas with low population density (private gardens, swimming pools, etc.)

ALTERNATIVES

As an alternative, the Mediterranean urban model is proposed, characterized by a mid density. By this, the citizens can live near their workplace where there are more social interactions and there is a shared resource use. Comparing with the former model, in a same street there are more people living, so the need for asphalt decreases and less space is occupied.

The alternative is a city where people can move by public transportation, foot or bike, where the services and working places lie near the residence of the citizen, with public green areas. It would consist in promoting cities with an independent functioning, with municipal markets, neighbourhood shops (with higher knowledge on the type and quality of the products being bought, and with lower prices), offices, etc.

For this purpose, the M-30 could have received features typical of an urban driveway, building infrastructures for public transportation, improving the inhabitability of the entire city and promoting the independent development of all the other urban centres of the Madrid region.

However, those works and the development followed by all the region (radial motorways, M-501, M-50, big residential areas), promotes the creation of an increasingly unsustainable mega-city, to which millions of people have to travel every day from surrounding residential areas with scarce services.