OPEN LETTER FROM CONCERNED CITIZENS AND CIVIC ORGANISATIONS OF HYDERABAD

Subject: ***Demand for a Scientifically Grounded Re-Assessment of the H-CITI Flyover Project around KBR National Park, and the adoption of evidence-based traffic and ecological management alternatives***

Date: 23.05.2026

To

1. The Hon'ble Chief Minister, Government of Telangana
2. The Hon'ble Minister for Municipal Administration & Urban Development, Government of Telangana
3. The Commissioner, Greater Hyderabad Municipal Corporation (GHMC)
4. The Principal Chief Conservator of Forests, Telangana State Forest Department
5. The Secretary, Ministry of Environment, Forest and Climate Change (MoEFCC), Government of India
6. The Chairperson, Telangana State Pollution Control Board
7. The Member Secretary, Hyderabad Metropolitan Development Authority (HMDA)

Copy to

- The Hon'ble Supreme Court of India (for kind reference, in connection with the proceedings in W.P. (C) … of 2026)
- The National Green Tribunal, Southern Zone, Chennai
- The press

1. Who we are, and why we are writing

We are a coalition of residents' welfare associations, environmental groups, urban planning professionals, public-health practitioners, scientists, engineers, transport researchers, lawyers and concerned citizens of Hyderabad. We are seriously concerned about **inappropriate infrastructure decisions presented as scientific ones**.

Specifically, we are writing to formally place on record our objections to the H-CITI (Hyderabad City Innovative and Transformative Infrastructure) project of seven steel flyovers and seven underpasses around the Kasu Brahmananda Reddy (KBR) National Park, the proposed felling/translocation of approximately 1,942 trees in and around its eco-sensitive zone (ESZ), and, most importantly, the **unscientific and reductive carbon-accounting argument** that the GHMC has placed before the courts and the public to justify this project.

We are pro-evidence. The published scientific literature on urban transport, embodied carbon and urban forestry makes a sustained and unanimous case that the GHMC's framing is wrong, that the proposed intervention will not

durably solve Hyderabad's traffic problem, and that genuinely effective solutions exist and have been demonstrated in some of the world's largest cities. This letter sets out that case, with references.

2. The GHMC's carbon argument fails on its own terms

GHMC's central justification is that the carbon emissions saved by eliminating engine idling at the affected junctions will exceed the carbon sequestered by the trees that must be felled; the flyover is environmentally net-positive. We submit that **this comparison is scientifically incomplete in at least four critical ways**, each of which has been established in peer-reviewed literature.

2.1 The argument ignores induced demand, a result so robust that economists call it a "fundamental law"

The single most well-established finding in modern transport economics is that adding road capacity in a congested urban network does not reduce congestion in the long run. It **generates new traffic**, which fills the new capacity, returning travel speeds and congestion to roughly their previous state, but at a far higher volume of vehicles, vehicle-kilometres travelled (VKT) and emissions.

"We investigate the effect of lane kilometers of roads on vehicle-kilometres traveled (VKT) in US cities. VKT increases proportionately to roadway lane kilometers for interstate highways… We conclude that increased provision of roads or public transit is unlikely to relieve congestion."

- ***Duranton, G. & Turner, M.A.(2011).*** "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review* 101(6): 2616–2652).

This is not an isolated American finding. Replications using two decades of data for **545 European cities** by ***Garcia-López, Pasidis and Viladecans-Marsal*** (Journal of Economic Geography, 2022) report essentially identical results: an elasticity of travel with respect to capacity that is essentially unitary, every 1% expansion of road capacity generates roughly 1% more vehicle-kilometres travelled. Hymel (Transport Policy, 2019, "If you build it, they will drive") finds the same for the United States. ***Hsu and Zhang*** have replicated it for Japan's national expressways.

"The best available science worldwide - in Europe, Japan and North America - shows a 'unit-elasticity' of travel with respect to capacity: A 1 percent expansion of capacity tends to generate 1 percent more vehicle miles traveled." - City Observatory, summarising Duranton & Turner, Hymel, Garcia-López et al.

The implication for GHMC's carbon math is direct. Whatever per-vehicle emissions are saved by reduced idling at a particular junction will be **more than offset** by the increase in total vehicle-kilometres on the wider network that the new capacity attracts. This effect on emissions is not a fringe view. The peer-reviewed finding of Bigazzi and Figliozzi (Portland State University) is explicit:

"Induced or suppressed travel demand … are critical considerations when assessing the emissions effects of capacity-based congestion mitigation strategies. Capacity expansions that reduce marginal emissions rates by increasing travel speeds are likely to increase total emissions in the long run through induced demand."

- ***Bigazzi, A. Y., & Figliozzi, M. A.*** (research summarised in City Observatory, "Urban myth busting: Congestion, idling, and carbon emissions").

There is also a second-order effect that GHMC's calculation appears not to acknowledge: vehicles do not have a single fixed emissions rate. Idling is fuel-inefficient; so is high-speed cruising. A flyover that allows vehicles to travel at 70+ km/h emits more CO_2 per kilometre than the same vehicle cruising at moderate urban speeds. Reduced idling at the chowrastha can therefore be partly cancelled out by **higher per-kilometre emissions across the broader corridor**, before induced demand is even counted.

2.2 The argument ignores embodied carbon - the upfront carbon debt of construction

The flyover is being treated, in GHMC's framing, as if it had no carbon footprint of its own. This is false. Steel and cement are two of the world's most carbon-intensive industrial outputs.

"Iron/steel and cement/concrete alone contribute roughly 7% and 6% respectively to global emissions… Embodied carbon represents about 11% of global energy-related emissions in the buildings and construction sector."

- ***American Council for an Energy-Efficient Economy (ACEEE),*** "Embodied Carbon" (2024).

"Embodied carbon is released predominantly upfront, before [the asset] is occupied, and cannot be reversed once construction is complete. This characteristic gives embodied emissions a disproportionately high impact on near-term climate change, particularly within the next several decades, which are critical for meeting global climate targets."

- ***Mhamadi et al.,*** "Cradle-to-Gate Assessment and Mitigation of Embodied Carbon," *Buildings* 16(5): 928 (MDPI, 2026).

Seven steel flyovers and seven underpasses carry a substantial upfront carbon debt, by reasonable engineering estimates, several thousand tonnes of CO_2-equivalent, that must be paid in full before a single gram of idling emissions is "saved." A genuine net-carbon calculation must include this. GHMC has not made any such calculation public. We respectfully demand that it do so, prepared by a qualified independent agency.

2.3 The argument treats trees as single-purpose carbon machines

The implicit logic, "this many tonnes of CO_2 sequestered per year by X trees vs. that many tonnes saved", is not how trees function as ecological infrastructure. Mature urban trees deliver a bundle of services no flyover can replicate:

- **Disproportionate carbon storage by mature trees.** Peer-reviewed studies show that large mature urban trees (stem diameter > 30 inches) "store approximately 800–900 times more carbon than small trees (< 10 in)" and remove roughly **50 times more carbon annually** than small healthy trees (Bayou et al., "Estimating economic and environmental benefits of urban trees in desert regions," *Sustainability*, 2021; based on i-Tree models). The KBR canopy is composed precisely of such mature specimens. Saplings planted in compensation will need 20–40 years to even approach equivalent biomass.
- **Urban heat island moderation.** A mature canopy can reduce local ambient temperatures by 2–5 °C, of direct importance to a city that has experienced repeated heat events.
- **Stormwater management.** Tree root systems absorb and slow rainfall. The impermeable surface of a flyover, by contrast, **increases** runoff, raising local flooding risk, already a chronic Hyderabad problem.
- **Biodiversity infrastructure.** KBR Park supports over 120 bird species and 500 species of flora, a level of biodiversity that no engineered structure can host.
- **Public mental and physical health.** Proximity to green space is among the most robust predictors of urban population health outcomes; this is well established in the peer-reviewed literature (see *Lancet Planetary Health* series on green space exposure).
- **Zero operational carbon and zero replacement debt.** Trees require sunlight and water. A flyover requires ongoing maintenance, repaving, and demolition/replacement every 30–40 years, each cycle adding more embodied carbon.

Translocation, the proposed mitigation, is not a substitute. Survival rates for mature, roadside translocated trees in Indian conditions are documented to be poor; the GHMC and Tree Protection Committee have published no post-survival audit of comparable previous projects to demonstrate otherwise.

2.4 The argument compares the flyover only against "do nothing"

A scientifically honest cost-benefit assessment compares the proposed intervention against **alternative interventions**, not against inaction. There are several well-documented, peer-reviewed, lower-cost, lower-embodied-carbon alternatives that GHMC has not seriously evaluated in the public domain. We come to these in Section 4.

3. Los Angeles: the cautionary tale of "build flyovers, solve congestion"

Of all global examples, no city has invested more in elevated and grade-separated road infrastructure than Los Angeles. The result, after decades

and tens of billions of dollars, is the most congested urban road network in the United States. The lesson is direct and unambiguous.

The **I-405 Sepulveda Pass Improvement Project** in Los Angeles, California is the most-studied recent example.

"The extra lane of the I-405 between the 10 and the 101 freeways that opened in May, 2014, to supposedly alleviate congestion actually ended up adding a minute of travel time for drivers of the 10-mile stretch, and new data shows congestion is even worse. The $1.6-billion infrastructure investment, known as the I-405 Sepulveda Pass Improvement Project, still resembles the parking lot at a Guns & Roses concert."

- ***Streetsblog USA,*** citing INRIX traffic data (2019).

"The project cost more than a billion dollars, took five years to complete, displaced homes and businesses, and still failed to reduce congestion. Traffic is now worse than before construction began."

- ***The Greenlining Institute,*** "The Data Behind California's Highway Expansion Crisis" (2025).

"So you have a road that is every bit as congested, just wider."

- ***Professor Michael Manville,*** Associate Professor of Urban Planning, UCLA Luskin School of Public Affairs, (quoted in Streetsblog).

For the second I-405 expansion in Orange County (a US$1.9 billion project), the very design document was unable to disprove the induced-demand critique. As researchers using the Induced Travel Calculator have shown, the project would induce an estimated 87.8 million additional vehicle-miles per year.

Even Caltrans, the California state transport agency, has now publicly acknowledged that "adding lanes to freeways is an ineffective way to reduce traffic in the long term." (CBS Los Angeles, 2019.)

The relevance to Hyderabad is exact. Los Angeles is a city of approximately 4 million in the city proper and roughly 13 million in its metropolitan area, comparable in order of magnitude to Hyderabad. It is also a city that explicitly tried to engineer its way out of congestion through grade-separated flyovers. It failed. Hyderabad is proposing to repeat that experiment, with the additional cost of destroying its most valuable urban ecological asset.

4. What actually works: evidence from major European cities

The world's most liveable, low-emission and well-functioning large cities have stopped trying to widen their way out of congestion. They have, with peer-reviewed and measured results, adopted a different toolkit. We urge Hyderabad's authorities to study these examples seriously.

4.1 Paris (population approx. 2.1 million city / 11 million metro)

Paris has done what no Indian city has yet attempted: **systematically removed urban motorways and reallocated road space to people and transit**. The Voie Georges-Pompidou expressway along the Right Bank of the Seine, carrying approximately 43,000 vehicles a day, was permanently pedestrianised in 2016 after the Left Bank had been pedestrianised in 2013.

Critics predicted the "traffic apocalypse." It did not occur. Instead:

"In Paris, France, decades of urban design choices and expanded investment in non-car transportation have produced a sustained drop in car use - as well as fewer crashes and less pollution."

- Urban Institute, "How Cities Can Use Paris as a Model for Implementing Safer Street Infrastructure" (2025).

The share of Parisian households without a car has risen from 40% (in 2001) to over 60% today. Most streets are now restricted to 30 km/h. The city's experience confirms an important and often counter-intuitive corollary of induced demand: just as **building roads generates traffic, removing road capacity reduces it,** a phenomenon transport economists call "traffic evaporation," well documented in the academic literature (Cairns, Atkins & Goodwin, *Municipal Engineer* 2002; reviewed by SACTRA, UK).

4.2 London (population approx. 9 million city / 14 million metro)

London introduced its **Congestion Charge** in February 2003. Detailed published assessments (Beevers & Carslaw, *Atmospheric Environment*, 2005; Transport for London Impact Monitoring Reports 2003–2007; the UK Department for Environment, Food and Rural Affairs detailed assessment) found:

- An **18% reduction in traffic volume** and **30% reduction in traffic congestion** within the charging zone.
- An estimated **19% reduction in traffic-related CO_2 emissions** within the zone and **20% reduction in fuel consumed** by road transport in the zone.
- **12% reductions** in both NOx and PM10 emissions from road traffic in the central area.
- Net revenue of over £90 million in 2004/05 alone, **reinvested in improved bus services**.

"Implementing restrictions on high-polluting vehicles in a significant part of London has contributed effectively to improving air quality in the broader London area and reducing CO_2 emissions." - OECD, IPAC Policies in Practice (2022).

Congestion pricing is the textbook intervention recommended by economists from Nobel laureate William Vickrey onwards. It produces measurable emissions and congestion reductions at a tiny fraction of the embodied carbon and capital cost of a flyover network, and without destroying a single tree.

4.3 Barcelona (population approx. 1.6 million city / 5.6 million metro)

Barcelona's **Superblocks** ("Superilles") programme reorganises a 3×3 grid of streets so through-traffic uses only the perimeter, while interior streets are calmed and given over to walking, cycling, greenery and public life.

"Studies already show that superblocks are a success: 'There's a positive effect on health and well-being.' … There's more green, less air pollution, less noise… better impact on physical activity levels, and better mental health… And of course it's also good for CO_2 emissions. They're being reduced… Local business hasn't taken a hit. Traffic has dropped and, crucially, didn't increase on external streets."

- Nieuwenhuijsen, ISGlobal, quoted in *Washington Post* (2024).

Independent modelling published by ISGlobal estimated that a full Barcelona superblock rollout (≈500 blocks) could prevent an estimated 667 premature deaths per year and avoid approximately 41,000 tonnes of CO_2 emissions annually, at a fraction of the capital cost of even one major flyover. The model has now spread to Vienna, Berlin (Kiezblocks), Hamburg (Superbüttel), Leipzig, Darmstadt (Heinerblocks), Brussels and Ghent.

4.4 Vienna (population approx. 2 million)

Vienna has consistently topped global liveability indices while keeping car mode share among the lowest in any large European city. This was achieved not through road-building but through:

- Sustained investment in U-Bahn, tram and bus networks
- A €1/day annual public transit pass (€365/year), increasing transit ridership dramatically
- Pedestrianisation and tactical traffic-calming

"An adjustment in commuter behavior in Vienna, from 27% to 26% car trip share, could result in an astonishing yearly reduction of approximately six million trips."

- Prieto-Curiel, Complexity Science Hub (2025).

4.5 What recent peer-reviewed research says about the alternative

A 2025 study published in *Nature Communications* of China's 100 most congested cities (a far closer analogue to Hyderabad than Los Angeles) demonstrates that **adaptive, big-data-driven traffic signal control alone delivers substantial benefits without any new road capacity**:

"Big-data empowered adaptive traffic signals reduced peak-hour trip times by 11% and off-peak by 8%, yielding an estimated annual CO_2 reduction of 31.73 million tonnes."

- Zhang et al., "Big-data empowered traffic signal control could reduce urban carbon emission," *Nature Communications* (2025), doi: 10.1038/s41467-025-56701-4.

This is precisely the kind of intervention Hyderabad has not seriously attempted at the affected junctions before resorting to grade-separated infrastructure.

5. The procedural and legal concerns

Beyond the scientific case, we draw attention to grave procedural concerns regarding the reduction of the KBR National Park's Eco-Sensitive Zone, which a Supreme Court bench of Justices B.V. Nagarathna and Ujjal Bhuyan has now placed under interim stay (Order dated 18 May 2026).

- The MoEFCC's October 2020 notification fixed the ESZ at widths ranging from a mere **3 metres to 29.8 metres,** far below the standard 10-km default and below internationally accepted norms for buffer zones around protected areas.
- The petitioner, Ms Kaajal Maheshwari, has placed on record that the **mandatory public hearing was not held**, that **more than 1,000 written objections and approximately 19,000 signatures** were submitted opposing the reduction, and that these were not meaningfully addressed.
- Activists, including Sri Sagar Dhara, Sri Narasimha Reddy Donthi, Sri Kingshuk Nag and Ms Lubna Sarwath, have publicly alleged that the H-CITI project has been **fragmented into separate components** to avoid a comprehensive Environmental Impact Assessment, a practice that has been deprecated by the National Green Tribunal in earlier cases.

We respectfully submit that infrastructure projects of this magnitude, located adjacent to a notified National Park, **cannot be sliced into sub-components** for environmental clearance. A single, integrated EIA, including induced demand modelling, embodied carbon accounting, ecosystem services valuation, and a comparative assessment of alternatives, is the minimum that the law and the science demand.

6. Our demands

In light of the above, we, the undersigned citizens and organisations, respectfully but firmly demand the following:

1. **Immediate and full compliance with the Supreme Court's interim stay** of 18 May 2026 on all tree felling within the ESZ of KBR National Park.
2. **A comprehensive, integrated, independent Environmental Impact Assessment** of the entire H-CITI project, not its individual flyover and underpass components, conducted by a qualified body independent of GHMC and the project contractors, and placed in the public domain before any further work.

3. **The EIA must explicitly include:**
    - Induced demand modelling using the methodology of Duranton & Turner (2011), Hymel (2019), or the publicly available Induced Travel Calculator;
    - Whole-life embodied carbon accounting (cradle-to-grave) for the proposed structures;
    - Quantitative valuation of the ecosystem services of the KBR ESZ, including urban-heat-island mitigation, stormwater management, biodiversity and public health benefits;
    - A formal comparative assessment of alternatives, including the ones listed in §7 below.
4. **A formal public hearing** under the EIA Notification 2006 framework, with adequate notice, in Telugu, English and Urdu, in the affected wards.
5. **Disclosure of the data and assumptions** underlying GHMC's claim that the flyovers will reduce net carbon emissions, including (a) idle-emission estimates, (b) embodied carbon, (c) projected VKT with and without the project, and (d) the time horizon used.
6. **Restoration of the ESZ** to the widths originally proposed under MoEFCC guidelines, with proper notification after a genuine public hearing.
7. **A moratorium on further tree felling** in any part of Hyderabad's notified protected areas or their ESZs until items (2)–(6) above are completed.

7. What we propose, instead of the GHMC’s proposal, is a scientific approach to Hyderabad's traffic problem

We are not asking the government to do nothing. We are asking the government to do the **right things**, drawn from the peer-reviewed evidence base.

Specifically, we propose:

1. **Adaptive, sensor-based, big-data signal optimisation** at the six affected junctions, following the methodology demonstrated in the *Nature Communications* (2025) study of 100 Chinese cities, which delivered 8–11% trip-time reductions without new road capacity.
2. **Bus priority lanes and BRT integration** along the corridor, supported by a feeder network to existing Metro stations.
3. **Last-mile and last-100-metre pedestrian and cycling infrastructure** to reduce short-trip car use (which constitutes 30–40% of all urban trips in Indian cities of Hyderabad's size).
4. **Congestion pricing or restricted-access zones**, following the London and Stockholm models, in the most congested zones, with revenues hypothecated to public transport.
5. **Demand management through staggered work hours** and remote work incentives for the IT corridor workforce.
6. **Junction redesign rather than grade separation,** including signal cycle redesign, pedestrian-safe channelisation, dedicated turning lanes and roundabouts where geometrically suitable.
7. **A "no net tree loss" policy** for any urban infrastructure project in Hyderabad, with translocation survival audited at 5 and 10 years.

8. **A Hyderabad Comprehensive Mobility Plan**, prepared jointly by HMDA, GHMC, Hyderabad Metro Rail and citizen groups, that takes induced demand and embodied carbon seriously as planning constraints, and not as inconveniences to be ignored.

8. Closing submission

The KBR Park flyover debate is not, at its core, about a few trees and a few flyovers. It is about whether Hyderabad will be a city that makes its infrastructure decisions on the basis of evidence, or on the basis of expediency dressed up as evidence.

The published scientific literature is unanimous on the relevant points. Adding road capacity in a dense city does not reduce congestion in the long run. Mature urban trees provide multiple, irreplaceable services. Embodied carbon is a real and substantial cost. Effective alternatives exist, are well-documented, and have been implemented in some of the largest and busiest cities in the world.

The citizens of Hyderabad who object to this project are pro-science, pro-frugal engineering, pro-people, pro-ecological and pro-environmental justice development, and not anti-development. We are asking, as is our right and our duty, that public money be spent on interventions that have been **shown to work**, and that public ecological assets not be destroyed based on arguments that cannot survive scientific and robust engineering scrutiny.

We trust that this submission, and the references it contains, will receive the serious engagement that the gravity of the matter demands.

Respectfully yours,

Environmental Justice Forum (EJF), Hyderabad

On behalf of:

1. Dr K. Babu Rao, Ex. Chief Scientist, IICT, Scientists for People, EJF
2. Dr Donthi Narasimha Reddy, Public Policy Expert, EJF
3. Dr P. Narayana Rao, Ex.Member, APPCB, & Editor, Environment & People, Convener, EJF, Hyderabad
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5. T.V.Sai Kalyani, Assistant Professor, Dept. of Electrical and Electronics Engineering

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35. MoEFCC Notification, October 2020, fixing KBR National Park ESZ at widths between 3 m and 29.8 m.
36. Reports of the Hyderabad District Tree Protection Committee, granting permission for the felling of 1,532 and translocation of 380 trees of the 1,942 proposed under H-CITI.
37. Coverage in *The Hindu*, *Deccan Chronicle*, *The South First*, *The News Minute*, *The Hans India* and *NewsMeter* (April–May 2026), documenting public objections, the procedural history of the ESZ notification, and the Save KBR Movement campaign.

This letter is open for endorsement. Citizens and organisations wishing to add their names may write to: …… (email / postal address of the convening group).