

Subject: Diversion of 55.73 ha. of forest land in Ramagiri (East & West) RF of Ananthapur Division for establishing 40.00 MW Wind Power Projects – in favour of M/s. Sarjan Realities Ltd., Hyderabad.

The State Government of Andhra Pradesh vide their letter dated **16.02.2012** had submitted the above subject **Wind Power Project** proposal to obtain prior approval of the Central Government, in terms of the Section-2 of the Forest (Conservation) Act, 1980 for establishing 40.00 MW Wind Power Projects – in favour of M/s. Sarjan Realities Ltd., Hyderabad, and pending since then.

2. This proposal had so far been considered in four FAC meetings on 20.04.2012, 12.07.2016, 26.12.2016 and last on 30.03.2017.
3. This proposal was **first placed** before Forest Advisory Committee (FAC) in its meeting held on **20.04.2012** and the recommendations of FAC (**P.7/n**) as below:

“ FAC after detailed deliberations recommended that an appropriate expert to be drawn from Bombay Natural History Society (BNHS) or Salim Ali Centre for Ornithology and Natural History (SACON) or Nature Conservation Foundation (NCF) may be requested to inspect the area in and around the forest land proposed for diversion to assess the impact of proposed project on wildlife especially birds and raptors, and submit the report containing appropriate recommendations, including mitigative measures to minimize/prevent the mitigable impacts.”. Due to above recommendations by FAC the project is on hold since April 2012 as user agency has no control over such a recommendation of FAC.

4. Accordingly, the recommendation of FAC was communicated by this Ministry on 18.05.2012. Another letter dated 27.08.2012(**pg.418-419/c**) was also sent by this Ministry to BNHS requesting to depute a suitable expert, **however in the intervening 4 years no response from Bombay Natural History Society (BNHS) or Salim Ali Centre for Ornithology and Natural History (SACON) or Nature Conservation Foundation (NCF) had been received in this regard.**
5. The FAC in its meeting on 12.07.2016 considered the matter and hearing the User Agency and also considering the fact that **the User Agency had written to BNHS and examining all correspondences recommended the following:**
 - i. The FAC after consideration of the matter recommended that the study to assess the impact of the proposed project on wildlife, especially birds and raptors may be done as per the guidelines issued by the Ministry vide F No 8-47/2008-FC dated 16/03/2008 through any expert agency including SACON, NCF etc.
 - ii. The FAC also recommended that the study report be submitted through the Nodal Officer, FCA of the State and the concerned Regional Office, MoEF & CC.
6. As per the recommendation of FAC in its meeting on 12.07.2016 , State Government of Andhra Pradesh was forwarded the study conducted by University of Krishnadevaraya, Ananthapur through Regional Office, Chennai vide letter No. F.No. 4-APA870/201-BAN/2319 dated 22.11.2016.
7. The FAC in its meeting on 26.12.2016 observed that the instant study did not indicate any significant negative/adverse impacts due to the project. The FAC also considered the recommendations given in study which were as follows:
 - (i) During the construction phase of the wind power project, no works should be carried out during night time.
 - (ii) No tar (Black top) roads should be constructed in the project area.

- (iii) Compensatory Afforestation plantations may be taken up preferably with local species.
- (iv) Plantations of fruit bearing species should be avoided near the project site to prevent birds being attracted near wind mills.
- (v) Carcasses of dead animals should be disposed away from the wind mills site to prevent raptors being attracted near the wind mills.
- (vi) Appropriate habitat management operations like construction of artificial water bodies may be taken up by the forest department authorities where ever required for wild life conversation.
- (vii) Livelihood to the local population should be monitored continuously.
- (viii) Project personal may be given basic information about bio-diversity conservation and awareness programmes may be conducted for sensitizing about bio-diversity conservation.
- (ix) Where ever possible, pipe culverts should be used in road construction so that small mammals, herbivores and other reptiles can cross the roads from such structures.
- (x) Soil and moisture conservation major may be taken up in and around the project site by forest department on equivalent area.
- (xi) Local population may be adequately compensated where ever private land / Agricultural land are taken up for project needs.
- (xii) Awareness camps about green energy project may be taken up by arranging visits of local educational institutions to the Wind mills sites.

10. The FAC after having considering the above facts and all other details pertaining to the proposal and the study report submitted by the Sri Krishnadevaraya University decided that detailed comments on the study be provided by Dr Deepak Apte, Member FAC.

8. The FAC in its meeting held on 30.03.2017 considered the report of Dr Deepak Apte (ex - member FAC) which are as below:

COMMENTS ON EIA OF RAMGIRI WIND POWER PROJECT

Overall, both the study undertaken and the standard of the report are substandard, and it is very evident that the personnel involved in the EIA work lack the credentials to undertake systematic ecological surveys, EIA or wildlife studies. These people are not acquainted with basic survey methodologies hence the report cannot withstand preliminary scientific scrutiny.

Even the title of the report **Report on 49mw proposed by M/s Sarjan Realities Ltd to assess the impact of the project on wildlife, especially birds and raptors in 55.73 ha in Ramagiri East and West Reserve Forests of Anantapuramu District, Andhra Pradesh** needs change. This title would suggest that the wind power project of the company will be carrying out the impact assessment! Instead, the title could be **Assessment of the impacts of the proposed 40mw wind power project of M/s Sarjan Realities Ltd in Ramagiri East and West Reserve Forests of Anantapuramu District, Andhra Pradesh on wildlife, and especially birds and raptors.**

Some of the specific comments on the inadequacies of the study/report are:

1. An EIA impact assessment on avifauna in an area should ideally span the seasons (summer, monsoon and winter) to account for resident, resident species that undertake local migrations, and winter migrants. This study is confined to only one season (early part of SW Monsoon),

therefore it has failed to detect any turnover of species and draw any scientific conclusion and hence is inadequate in this aspect.

2. Even without carrying out studies for the rest of the two seasons, a statement is made under Findings (page 25) that “the project area does not come in the path of migratory birds”. How was this inferred without the study being conducted in winter and post winter, which is when the migratory birds arrive and depart from the Indian region?
3. Even if it had been suggested by the concerned Committee that only a short-term study needs to be done (as mentioned in Introduction), this can be offset by undertaking a more intensive and systematic study with proper sampling, and further supported by references to published literature.
4. The researchers have mentioned of adopting basic sampling methodologies, but other than this being mentioned, it is not reflected in the report’s findings by way of data analysis and discussions, and what is presented in the form of tables/lists are basically inventory records.
5. Many Schedule-I species under WPA have been reported in this report. If this is taken in to account the project does not warrant clearance. However, these observations are not based on scientific investigation but based interviews of local people and speculation of investigators.
6. It is difficult to understand the role of GIS and Remote Sensing in this study. This study indicates the change detection in the landscape based on satellite images of 1995 and 2016. It clearly shows that the scrub forest is taken over by the agricultural land. This does not have any relevance to the current study. It is also difficult to understand which is the exact area going to be affected by the project and its proximity to forest or any crucial habitat.
7. Species such as Common Toad and Cricket Frog which are not found in India are reported. Although the scientific names of these belong to Indian species. This is misleading and indication of lack of scientific rigor among the investigators.
8. Identification of several bird species is doubtful. Species such as Black Stork which are known to migrate to peninsular India in mid-winter have been reported. However, this study indicates their presence in September which is difficult to accept.
9. The report is replete with wrong spellings of scientific and common names of species. Moreover, there are many cases of wrong identification, e.g. recording quite a few species of winter migrants, including warblers, during the study period (early and mid SW Monsoon).
10. The conclusion of the report suggests that there are no migratory species in the study area. However, the bird checklist suggests at least 5 big migratory birds which include 4 migratory raptors (Of them Pallied Harrier is Near Threatened species under IUCN Red List Category) and a stork. In addition to this 15 migratory passerines are also mentioned in the list. This contradicts the conclusion of the report.
11. Last, but not least, there is no discussion on the potential, negative impacts of wind mills on birds (including raptors) and bats in general, which is available in literature. There is also no mention of the number of windmills that will come up in the area, their locations, spacing, and other such details to enable one to assess their impacts on birds better.
9. **FAC recommendation in its meeting held on 30.03.2017:**The FAC after having considered the above observations and also the fact that the project was related to wind energy (clean energy) recommended that the proposal be sent to the Wildlife Division of the Ministry for examining the study conducted by Sri Krishnadevaraya University *vis a vis* the comments of Dr Deepak Apte (Director BNHS) and recommending adequate mitigative measures which will be binding on the project proponent. The Wildlife Division shall complete the exercise within a period of 30 days from receipt of the proposal.
10. In view of the above recommendation of the FAC, a copy of the minutes of the FAC meeting along-with a copy of proposal (Form A comprising part-I to part-V), a copy of study report conducted by Sri Krishnadevaraya University and the comments of Dr Deepak Apte (Director

BNHS) on the said report was sent to IGF(WL) on 20.04.2017 **for recommending adequate mitigative measures which will be binding on the project proponent.**

11. The Wild Division has examined the matter and not recommended adequate mitigative measures which will be binding on the project proponent, as sought by FAC on 30.03.2017. The comments of Wildlife Division (F/C) is as under:

“Considering the comments of Dr.Deepak Apte, Director, BNHS, we may suggest that EIA of proposed wind turbines be conducted by SACON.The fund for conducting the EIA Study wuld be provided by the user agency”

In view of above, it is proposed that the above facts of the proposal may be placed before FAC in its forthcoming meeting on 17.08.2017 for their examination and appropriate recommendation.
