

Letter No.8586/FR.10/2023 – 1, dated: 28.05.2024

From
Tmt.Supriya Sahu, IAS.,
Additional Chief Secretary to Government.

To
The Assistant Inspector General of Forests (Central),
Government of India,
Ministry of Environment, Forests and Climate Change,
Regional Office,
Additional Office Block for GPOA, 1st Floor,
Shastri Bhawan, Haddows Road,
Nungambakkam, Chennai-600 006. (w.e).

Sir,

Sub: Forests – Van (Sanrakshan Evam Samvardhan)
Adhinyam,1980 – Srivilliputhur Megamalai Tiger Reserve,
Madurai Circle / Srivilliputhur Wildlife Division – Proposal
(FP/TN/Others/143759/2021) for diversion of forest land of
0.2805 ha for Erection of New HT XLPE UG Electric cable
for electrification of Arulmigu Sundara Mahalingam Swamy
Thirukkoil located in Saptur Reserved Forest in Srivilliputhur
Wildlife Division area in Madurai District in favour of
Executive Engineer, TANGEDCO, Thirumangalam -
Rejected - Regarding.

Ref: From the Principal Chief Conservator of Forests (HoFF),
letter No.TS4/23623/2021, dated 03.01.2023.

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I am directed to enclose a copy of the reference cited wherein, the Principal Chief Conservator of Forests (Head of Forest Force) has stated that, the Executive Engineer, TANGEDCO, Thirumangalam has uploaded forest clearance proposal for diversion of forest land of 0.2805 ha for Erection of New HT XLPE UG Electric cable for electrification of Arulmigu Sundara Mahalingam Swamy Thirukkoil located in Saptur Reserved Forest in Srivilliputhur Wildlife Division area in Madurai District.

2. The Conservator of Forests & Field Director, Srivilliputhur Megamalai Tiger Reserve in his recommendation has stated that the upper reaches where there are evergreen high forests the laying of cable by way of digging trench would lead to large scale cutting of root system of the well grown and established evergreen tree species.

3. Further the Deputy Director, Srivilliputhur Megamalai Tiger Reserve, Srivilliputhur has reported that the electrification of Arulmigu Sundara Mahalingam Swamy Thirukkivil by laying 11 KV HT XLPE underground Electric Cable will be

detrimental to the ecological integrity of the area. The laying of the cable line would disturb the pristine forests and ecologically sensitive habitat of Nilgiritahr. It would destabilize the profile of the hilly slopes / soils. Hence, the proposal is not recommended by the Additional Principal Chief Conservator of Forests (FCA) / Nodal Officer of Forest (Conservation) Act of the State. Therefore, the Principal Chief Conservator of Forests (Head of Forest Force) has not recommended the proposal.

4. The Government have examined and accept the decision of Principal Chief Conservator of Forests (Head of Forest Force) to reject the proposal (FP/TN/Others/143759/2021).

5. I am, therefore, directed to request you to kindly obtain the concurrence of the Competent Authority on the above proposal as per sub clause 3(i) of rule 10 of Van (Sanrakshan Evam Samvardhan) Rules, 2023 and communicate the same to this Government, early.

Yours faithfully,

A. Malathy 28/5/24

for Additional Chief Secretary to Government.

J
28/5/24

Copy to:-

The Principal Chief Conservator of Forest
(Head of the Department), Chennai – 32.

The Executive Engineer,
O/o. the Executive Engineer Distribution,
Thirumangalam, Madurai - 625 706.

PART - V

(To be filled in by the Secretary in charge of Forest Department or by any other authorized officer of the State Government not below the rank of an Under Secretary)

Proposal (FP/TN/Others/143759/2021) for diversion of forest land of 0.2805 ha for Erection of New HT XLPE UG Electric cable for electrification of Arulmigu Sundara Mahalingam Swamy Thirukkoil located in Saptur Reserved Forest in Srivilliputhur Wildlife Division area in Madurai District in favour of Executive Engineer, TANGEDCO, Thirumangalam under section 2 (1) of Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980.

18. Recommendation of the State Government *NOT recommended*

(Adverse comments made by any officer or authority in Part-B or Part - C or Part - D above should be specifically commented upon)

Date : *28.05.2024*
~~06.2024~~

Place : Chennai-9.

D. Kanthimathi
28/5/2024
[D. KANTHIMATHI]
Signature
Name & Designation
(Official Seal)

Under Secretary to Government
Environment, Climate Change & Forest Department
Secretariat, Chennai-600 009.

TAMILNADU FOREST DEPARTMENT

From
Subrat Mohapatra, I.F.S.,
Principal Chief Conservator of Forests
(Head of Forest Force)
Forest Headquarters Building,
Guindy Velachery Main road,
Near Kannikapuram Checkpost,
Guindy, Chennai - 600 032.

To
The Additional Chief Secretary to
Government,
Environment Climate Change and Forests
Department, Secretariat,
Chennai 9

C. No. TS4/ 23623/2021, Dated: 03.01.2023

Madam,

Sub. Forests - Forest (Conservation) Act, 1980 –SMTR, Madurai Circle / Srivilliputhur Wildlife Division - Proposal for diversion of forest land of 0.2805ha for Erection of New HT XLPE UG Electric cable for electrification of Arulmigu Sundara mahalingam Swamy Thirukkoil located in Saptur RF – Online proposal submission by the User Agency ie TANGEDCO, Thirumangalam - Regarding

- Ref. 1. Online application uploaded by the User Agency – The Executive Engineer, TANGEDCO, Thirumangalam dt 19.06.2021. (FP/TN/others/143759/2021) and EDS uploaded on 19.08.2021 & 13.09.2021
2. Part-II, Inspection Report and Recommendation uploaded by the Deputy Director, SMTR, Srivilliputhur on 07.02.2022 and Part- III, Inspection Report and Recommendation uploaded by the Conservator of Forests & Field Director, SMTR, Madurai on 25.03.2022.

I wish to state that the User Agency, The Executive Engineer, TANGEDCO, Thirumangalam has furnished online application under Section 2 of Forest (Conservation) Act, 1980 in the prescribed format of Form A – Part I for diversion of forest land of 0.2805ha for Erection of New HT XLPE UG Electric cable for electrification of Arulmigu Sundara Mahalingam Swamy Thiru kovil located in Saptur RF

The User Agency has uploaded the proposal in the prescribed format of Form A Part I - under Section 2 of the Forest (Conservation) Act, 1980 for diversion of fresh forest area in the online submission and Monitoring of Forests Clearances Proposal (OSMFCP) portal.

The user agency has stated that the proposed erection of New HT XLPE UG Electric cable towards Electrification of Arulmigu Sundara Mahalingam Swamy Thirukkivil from through Vazhathoppu pathway to Arulmigu Sundara Mahalingam Temple area across Saptur R.F. in Srivilliputhur Wildlife Division area in Madurai District

2) The User Agency has furnished the following details / undertakings along with the proposal.

- I Form-A, Part-1 for seeking prior approval under Section 2 of the Forest (Conservation) Act, 1980.
- II. Short narrative of the proposal for which the forest land is required. (As required vide A-1 (iii) of proposal format).
- III. Copy of document in support of the competence / authority of the person making this application to make application on behalf of the User Agency (As required vide A-3, (xvii) of proposal format), the Executive Engineer, TANGEDCO has authorized the Assistant Engineer, TANGEDCO, Saptur section.
- IV Copy of Survey of India topo sheet indicating boundary of forest land proposed to be diverted has been up-loaded. (Section C of Maps-C.iii)
- V. Geo referenced location map of the proposed diversion of forest area (Section C(iv).Kml file of the segment area is enclosed and was not verified since Google earth file is not updated.
- VI. Note containing justification for locating the project in forest area (As required vide D(i) of proposal format.
- VII. For settlement of Rights under the Forest Rights Acts 2006 on the forest land proposed to be diverted has been uploaded. The user agency has uploaded the certificate obtained from the District Collector, Madurai. (as required vide K(i)of the proposed format) for "Linear Projects".
- VIII. Certificate regarding there is no catchment area treatment plan.
- IX. Certificate from the project proponent about no violation of the provisions of the Forest (Conservation) Act, 1980.
- X. Certificate from the project proponent about no other alternate suitable non forest land is available for the project.
- XI. Undertaking regarding to bear the cost of Compensatory Afforestation / penal Compensatory Afforestation / maintenance of plantation / protection of plantation if any for the proposed diversion of forest land as fixed by the Forest Department.
- XII. Undertaking to pay the Net Present Value which will be fixed as per the guidelines of Hon'ble Supreme Court of India as fixed by Forest Department has been uploaded.

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- XIII Undertaking to pay the additional Net Present Value which will be fixed as per the guidelines of Hon'ble Supreme Court of India as fixed by Forest Department if any in future.
 - XIV Undertaking to bear the cost along with exploitation of the trees if any available in the alignment path, for the proposed diversion of forest as fixed by the Forest Department.
 - XV Undertaking to agree to pay the cost towards lease rent as fixed by the Forest Department at the time of sanction along with any escalation in future for the forest land to be diverted for the above project.
 - XVI Certified that the forest land demanded for the above project is the barest minimum.
 - XVII Certificate from the District Collector, Madurai that no alternate land other than this forest land situated in Survey No:518 to an extent of 0.227ha is available for the proposed project vide District Collector's eference No. 19084/2021, X1, dt. 17.06.2021.

3) The Deputy Director, SMTR, Srivilliputhur has uploaded the Part-II of the above proposal and stated that

a) The area to be diverted for the above proposal is 0.2805 ha of density 0.7 and type of forest is Eco class 3.

b) The Deputy Director, SMTR, Srivilliputhur has inspected the area proposed for diversion on 09.01.2022 along with Forest Range Officer, Saptur; two Foresters (Saptur and Maharajapuram section) and two forest guards (Saptur beat IX and VIII). The details of the site inspection report is as follows

(i) The area requested by user agency for laying 11 KV HT XLPE underground Electric Cable towards Electrification of Arulmigu Sundara Mahalingam Swamy Thirukkivil from Vazhalthoppu pathway to Arulmigu Sundara Mahalingam Swamy Thirukkivil area across Saptur R.F is 0.2805 ha.

(ii) The proposed underground electric cable pass through Saptur beat IX and X and Watrap beat IV for a distance of 5.61 km. It is proposed that of the total 5.61 km, 2.27 km falls in plain land, 2.63 km in rocky area, 0.46 km stream area and 250 m elephant area.

(iii) ECOLOGICAL IMPORTANCE OF THE PROPOSED SITE FOR DIVERSION

- a. Part of Srivilliputhur- Megamalai Tiger Reserve
- b. Part of Agasthiyar Biosphere Landscape

- c. Part of elephant reserve No. 7
- d. Erstwhile Grizzled Squirrel Wildlife Sanctuary

(iv) **AREA DESCRIPTION AND ITS IMPORTANCE**

Majority of the project falls under core area of the Srivilliputhur- Megamalai Tiger Reserve which is also one of the best Tiger, Nilgiritahr, Grizzled Squirrel and Elephant habitats in Southern Western Ghats. The starting point of the project is Muniswaranpulisaragam, Valaithopu in Saptur beat IX which has tropical dry deciduous vegetation with high biodiversity value.

The cable passes through VagaiMarathuodai and Kurukkuodai which is major water source for Anaikaraipattikanmai, VandariKanmai and MainatthampattiKanmai in surrounding villages in the foot hills. Then the path traverses in the valley between Sengaliparaimottai and Kathadumottai on which nilgiritahr sightings are very common. Then the path goes along Saklianodai and PadivettiParai. The altitude increases from 179m from the starting point to 407m near PadivettiParai in about 1 km journey (228 m ascent). PadivettiParai is rocky portion devoid of vegetation beyond which again partially grassy and partially rocky area starts for some distance till KodaiaraiParai.

After this point, starts a place called Pallakkumudangi, which is almost 70° slope. Then at an altitude of 747 m the cable path crosses a stream called Kuzhirattiodai in Kuzhirattimottai which has montane grassland. This stream falls down from an altitude of 950 m and cable path crisscross this stream three times before takes the diversion towards a place called Koyyakanal. This entire stretch is rock portion and the Kuzhiratti stream in this portion runs only on rock for almost 9 to 10 months in a year. In this particular stretch cable remain under water completely at three locations for at least 9 months. Most importantly this stretch lies in the heart of NilgiriTahr habitat. Tahr uses this place for drinking water and move between hillocks. They move between hills called Sengaliparai and Kathadimottai via Kambatthumottai, Kuzhirattimottai and Tirugekallu (technically, paths connecting these hills form Nilgiritahr corridor). Among these, electric cable passes through Kathadimottai and Kuzhirattimottai and Tirugekallu for almost 2.5 km which is **prime nilgiritahr habitat** in Saptur Reserve Forest (map 1 and table 2).

From Koyyakanal to Sandanamahalingam temple electric cable traverse for a distance of 1.8 km in thick wooded vegetation and wet ground. This stretch is a very important elephant habitat in Watrap beat IV. According to the staff, Koyyakanal remains

wet and water is available throughout the year and hence large number of wildlife from surrounding areas congregate in this place during lean season. The cable for 1.8 km stretch passes through **elephant corridor** in Koyyakanal area. When the Sabarimala Yatra starts in Kerala during Pongal/ Makara Shankranthi elephants from Periyar Tiger reserve and Meghamalai Division of SMTR and Theni Forest Division migrates in two routes to Srivilliputhur Division which constitutes **Srivilliputhur – Saptur elephant corridor**.

1. Project Tiger Reserve > Vellimalai (Meghamalai Division, SMTR) > Palar (Meghamalai Division, SMTR) > Ammakasam > Sallimuttu (Meghamalai Division SMTR) > Karuvapillai kedai (Srivilliputhur) > Chinnaputhu (Pilavakal Beat II) > Sasthakoil medu (Pilavakal beat II) > Pulvelikadu (Khansapuram I) > Pilavakal Dam > Peachikheni (Watrap beat I) > Kovilam Dam (Watrap beat II) Kotamalai (Kotamalai beat) > Saptur beat X. Chinnavali and Periyavalli (Watrap beat IV) > Ooranikadai (Watrap Beat IV) > Tiruge kallu (Saptur beat IX/X) > Elliakuttam (Saptur beat IX/X) > Koyya kanal (Saptur bear IX) Kuruvi Kanal(Saptur bear IX) > Yanai Chelumbu (Saptur beat V) – Kannimara kedai(Saptur bear V) – Periakodai (Saptur bear VI) Pachiyathukadu (Saptur beat VII/VIII)

2. Deviyar and Kottamalai estate (Deviyar beat > Sastha koil > Pravadiyar beat. Chinnayankottai (Kotamalai beat) > Annman koil beat> Ayyan koil beat. From Ayyan koil beat elephants take two different routes

- a. Ayyan koil beat> Niravi beat > Kambattu mottai (Rajamparai beat) > Karuvupillai medu (Pilavakal beat II) to join route number 1
- b. Ayyan Koil beat > Rakatchiyamman koil > Shenbaga thopu > Alzagar koil > Mudaliar oothu (Khansapuram II Beat) > Periya puthu (Pilavakkal beat II) . Chinnaputthu (Pilavakal beat II) > Sastha koil medu (Pilavakal beat II) to join route number 1.

This corridor is the only corridor in Periyar-Agasthyamalai landscape supporting the migration of elephants between the states of Tamil Nadu and Kerala, and classified as **ecologically high priority corridor**.

(v) The List of important fauna found Saptur Reserve Forest, Srivilliputhur-Megamalai Tiger Reserve, Srivilliputhur

Sl. no	Species	Schedule in Wildlife Protection Act	IUCN conservation Status
1.	Tiger	Schedule I (Part I)	Endangered
2.	Elephant	Schedule I (Part I)	Endangered
3.	NilgiriThar	Schedule I (Part I)	Endangered
4	Grizzled Giant Squirrel	Schedule I (Part I)	Vulnerable
5	Common Langur	Schedule II (part I)	Least concern
6	Leopard	Schedule I (Part I)	Vulnerable
7.	Dholes	Schedule II (Part I)	Endangered
8.	Slender Loris	Schedule I (Part I)	Endangered
9.	Indian Gaur	Schedule I (Part I)	Vulnerable
10.	Sambar	Schedule III	Vulnerable
11.	Chital	Schedule III	Least concern
12.	Jungle Cat	Schedule II (Part I)	Not applicable
13.	Small Indian Civet	Schedule II (Part I)	Least concern
14.	Common Palm Civet	Schedule II (Part I)	Least concern
15.	Brown Palm Civet	Schedule II (Part I)	Least concern
16.	Common Mongoose	Schedule II (Part I)	Least concern
17.	Stripenecked Mongoose	Schedule II (Part I)	Least concern
18.	Sloth Bear	Schedule I (Part I)	Vulnerable
19.	Ruddy mongoose	Schedule II (Part I)	Least concern
20.	Mouse deer	Schedule I	Least concern
21.	Barking deer	Schedule III	Least concern
22.	Wild pig	Schedule III	Least concern
23.	Indian Pangolin	Schedule I (Part I)	Endangered
24.	Star tortoise	Schedule IV	Vulnerable
25.	Indian Porcupine	Schedule IV	Least concern
26.	Monitor Lizard	Schedule I	Least concern
27.	Changeable hawk eagle	Schedule I (Part III)	Least concerned
28.	Serpent eagle	Schedule I (Part III)	Least concerned
29.	Eagle owl	Schedule IV	Least concerned
30.	Jungle owlet	Schedule I (Part III)	Least concerned
31.	Indian scops owl	Schedule IV	Least concerned
32.	Emerald dove	Schedule IV	Least concerned
33.	Great Indian Hornbills	Schedule I (Part III)	Vulnerable
34.	Peafowl	Schedule I (Part III)	Least concern
35.	Grey jungle fowl	Schedule II (Part II)	Least concern
36.	Spectacled cobra	Schedule II (Part II)	Least concern
37.	Rat snake	Schedule II (Part II)	Least concern
38.	Indian krait	Schedule IV	Least concern

(vi) TEMPLE COMPLEX AND TOURIST FOOT FALL

Arulmigu Sundara mahalingam Swamy and Sandana mahalingam Temple complex have about 30 buildings which include 3 madams and one kitchen. Usually during normal years around 3 lakh pilgrims visits the temple per year. Presently no pilgrims are allowed to stay inside the temple beyond 6.00 pm except for trustees, priests, staff of Hindu Religious and Charitable Endowments Department and Police Department. The electricity need of the temple is met currently by diesel powered generators. Besides, around 35 solar street lights are already installed in the temple premises and are in good working condition. Roof tops of madam and shelter tops of the temples provide enough space to set-up solar panels which can meet the energy needs of the temple complex.

(vii) BIODIVERSITY CONCERNS

a. NILGIRI TAHR

Nilgiritahr (*Nilgiritragus hylocrius*) is an endangered mountain ungulate, belongs to the subfamily Caprinae. Tahr is the only mountain ungulate in South India among the 12 ungulate species that occur in India. The tahr is endemic to the Western Ghats-Sri Lanka biodiversity hotspot and restricted to the montane grasslands. Historically, the species occurred throughout the Western Ghats, which are now restricted to around 3000 individuals in less than one-tenth of its former range in Kerala and Tamil Nadu states in the Southern Western Ghats. However, the Tahr populations declined over the years due to hunting, conflict with livestock grazing and habitat loss. In addition, climate mediated habitat loss of Tahr resulting in the reduction of natural grasslands in the Western Ghats is also important cause of its population decline.

According to WWF, India (2015) survey on Nilgiri Tahr, there are about 150 tahrs in Srivilliputhur Division, SMTR, second highest only next to Kanyakumari Wildlife Sanctuary which has 250 tahrs. Recent survey (not published) conducted by WWF, India revealed the presence of tumorous growth even in the population of Srivilliputtur Division. Studies have shown that electric cables emit electromagnetic fields, which is generated when electricity flows inside the cable during the operation which can be divided into electric fields and magnetic fields. Ambient electromagnetic fields, such as ELF from power lines, wiring and electrical appliances are biologically active and may cause adverse effects on different species of living organisms. International Agency for Research on Cancer (IARC) at the World Health Organization (WHO) classified extremely-low frequency (ELF) magnetic fields and

radiofrequency radiation (RFR) as 2B possible human carcinogens - similar to lead, exhaust fumes, DDT and formaldehyde. Even when the cable is buried, the Earth fillings above do not entirely eliminate the EMF, but reduces exposure. Given the conservation status of Nilgiritahr, its habitat specialization and threats like small population size, climate change and tumorous growth of unknown etiology it is important to protect and preserve the last remaining habitat of this charismatic species and keep it free from any human disturbance in the best interest of this species.

b. ELEPHANT

1. Srivilliputhur Division is one of the important elephant habitats of India. It is a part of elephant reserve 7 and supports annual migration of elephants between Kerala and Tamil Nadu. According to synchronized elephant population estimation, 2017 it supports 74 elephants.

2. When the SabarimalaYatra starts in Kerala during Pongal/ MakaraShankranthi elephants from Periyar Tiger reserve, Megamalai Division SMTR and Theni Forest division migrates in two routes to Srivilliputhur Division which constitutes *Srivilliputhur – Saptur elephant corridor*. Hence, Srivilliputhur Division of SMTR serves as an important refuge for the migrating elephants.

3. **The proposed UG cable route passing through the heart of elephant corridor may endanger the habitat.** Besides, electrification of the temple will encourage people to stay back during the nights and the disturbance will have adverse impact on the ecological integrity of the surrounding forests and affect free passage of elephant and other wild animals and deteriorate the corridor value of the area.

4. This will consequently lead to straying of elephants and other wild animals into human dominated landscapes and increase the incidence of human-wildlife conflict in the nearby foot hills.

(viii) ECOSYSTEM SAFETY CONCERNS

Indian standard (IS) 1255 (1983): Code of practice for installation and maintenance of power cables up to and including 33 kV recommends that for laying and installing UG cables, side of the street which presents the least obstacles and the fewest roadway crossings is to be chosen. But the proposed path is rugged steep terrain with boulders, rocks, streams, trees and bushes. Indian standard (IS) 1255 (1983) also recommends only five methods of cables laying and installation viz., a) Laying direct in ground; b) Drawing in ducts; c) Laying on rack in air; d) Laying on racks inside a cable tunnel; and e) Laying along buildings or structures. However, it is proposed that for a

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distance of 2.63 km on rocky area the cable will be inserted inside galvanized iron (GI) pipe secured by clamps and covered by concrete. Technically, for a distance of 2.63 km UG cable will not be underground, which will compromise all the safety features of placing it underground. And in stream area for 0.46 km the cable is proposed to be buried in 2 m deep trench and concealed with concrete. On rocky area in at least three points Kuzhiratti stream flows for at least nine months in a year and the underground cable inserted inside the galvanized iron pipes covered with concrete will be exposed to water and moisture during water flow period. Construction of concrete structure on GI pipes to bury the UG cable across the streams in these three locations and on rocky portion creates stagnation of water on higher side of the concrete structure leading to infiltration of water around UG cable. And also in Koyyakanai, electric cable runs for almost 1.8 km, which is wet throughout the year.

Forest soil is generally acidic under humid climatic conditions. Moist and acidic forest soils adversely affect the life of cable. There are possibilities that the underground cable may get damaged due to boulders brought down by the flood, drift wood, elephants, rats, wild boars, porcupine, lightning and cause extensive damage to wildlife. When underground cables are damaged, it can put the entire surrounding ecosystem at risk and animals can be killed and injured by electric shock, electrical arcs and flames. According to *guidelines of Central Electricity Authority 2018 for use of underground cable system*, the identification of fault finding and repairing on underground cables is difficult as UG cables are buried in the ground and it require specialized techniques to find out the fault location as compare to overhead lines. Some time, it may take several days or weeks to find and repair the fault in underground system. There are incidences of human deaths recorded in Tamil Nadu also. Lima Rose, a resident of Choolaimedu in Chennai was killed when a pillar box burnt due to short circuit in the underground cable on 4th January 2020.

(ix) LEGAL ASPECTS

a. NORMATIVE STANDARDS FOR TOURISM ACTIVITIES IN AND AROUND TIGER RESERVES

National Tiger Conservation Authority, Ministry of Environment Forests and climate change in its letter No. 15-31/2012-NTCA dated 15th October, 2012 lays down the normative standards for tourism activities in and around tiger reserves. These guidelines are also applicable to pilgrim sites in and around tiger reserve.

PRINCIPLES OF TOURISM IN AND AROUND TIGER RESERVES.

The persons who implement and participate in tourism activities shall, inter alia, practice the following principles, namely:—

(a) adopt low-impact wildlife tourism which protects ecological integrity of forest and wildlife areas, secure wildlife values of the destination and its surrounding areas;

b) Tourism infrastructure shall conform to environment-friendly, low-impact aesthetic architecture, including solar energy, waste recycling, rainwater harvesting, natural cross-ventilation, proper sewage disposal and merging with the surrounding habitat. Violations of these norms will be appropriately dealt with by the LAC. Any violation of the guidelines will be referred to the appropriate authorities under intimation to the NTCA, for taking action in accordance to the relevant provisions of the law.

c) Tourism infrastructure must conform to environment-friendly, low impact, low height aesthetic architecture; renewable including solar energy, waste recycling, water management, natural cross-ventilation, no use of asbestos, discharge of only treated sewage, no air pollution, minimal outdoor lighting, and merging with the surrounding landscape.

d) In order to allow free passage to wildlife, developments shall be sensitive to the conservation of flora and fauna, and the corridor value of the area in and around tiger reserves.

e) Pilgrim sites located inside tiger reserves shall be in accordance with the Forest (Conservation) Act, 1980, Wild Life (Protection) Act, 1972 and the Environment (Protection) Act, 1986 to prevent any further expansion.

All rules relating to tourism facilities including noise, building design, use of alternate energy and free passage to wildlife shall apply to such pilgrim facilities.

Contravention of any provision of these guidelines or conditions laid therein by any person or organization shall be liable of an offence under subsection (2) of 38-O of the Wild Life (Protection) Act, 1972.

- 1) Hence, after carefully weighing the pros and cons of proposal and also considering the availability of alternatives in a holistic manner, it is concluded that the proposed project is not a fit case for recommendation for Wild Life Clearance under Wildlife Protection Act, 1972 and Forest Clearance under Forest Conservation Act, 1980.

4) In his recommendation also he has stated that the proposed project is **not a fit case for recommendation** for Wild Life Clearance under Wildlife Protection Act, 1972 and Forest Clearance under Forest Conservation Act, 1980.

5) The Conservator of Forests and Field Director, Srivilliputhur Megamalai Tiger Reserve (SMTR), Madurai has inspected the area on 19.03.2022 and stated that

The area requested by the user agency for laying 11 KV HT XLPE underground Electric Cable towards Electrification of Arulmigu Sundara Mahalingam Swamy Thirukkovil from Vazhathoppu pathway to Arulmigu Sundara Mahalingam Thirukkovil area across Saptur R.F is 0.28 ha. The proposed underground electric cable passes through Saptur beat IX and X and Watrap beat IV for a distance of 5.61 km. The following observations were made during the visit

- a) Majority of the proposed area for diversion falls under core area of Srivilliputhur Megamalai Tiger Reserve, Srivilliputhur Division.
- b) It is a part of Agasthiyar Biosphere Landscape, Elephant Reserve No. 7 and erstwhile Grizzled Squirrel Wildlife Sanctuary.
- c) Topography: The entire area is a hilly region and its altitude varies from 179 to 947 m above MSL. Several streams also run across the proposed area for laying underground cable. In several stretches the slope / gradient of the hill would be around 60-70 degree.
- d) Vegetation types: It varies from tropical dry deciduous forest in the lower reaches to tropical semi evergreen forest and montane grassland in the upper reaches.
- e) The forest inhabits lesser known mammals in the lower reaches and it is home for large mammals like Elephant, Gaur, Nilgiri Tahr, Sambhar, Common Langur in the upper reaches.
- f) The forest floor in the lower reaches is formed with disintegrated rocky boulders followed by long stretches of huge rocky outcrops. Grass lands along these rocky outcrops are an ideal habitat for Nilgiri Tahr.
- g) Arulmigu Sundara Mahalingam Swamy and Sandana Mahalingam temple complex has very few buildings which can be electrified by off-grid solar power.
- h) Currently, no pilgrims are allowed to stay inside the temple premises, free food distribution is permitted before frisking point at the foothills in Taniparai to prevent pollution in the hills as per Hon'ble Madurai Bench of Madras High Court judgment in W.P. (MD) No. 6400 of 2019.

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- i) Laying of the cable underground on the rocky stretches would necessarily involve blasting of rocks.
 - j) Overlaying the underground cable on the rocks inside galvanized iron pipes and covering it with concrete as proposed by user agency will endanger the entire ecosystem.

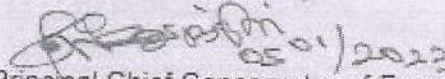
5) The Conservator of Forests & Field Director, SMTR in his recommendation has stated that the upper reaches where there are evergreen high forests the laying of cable by way of digging trench would lead to large scale cutting of root system of the well grown and established evergreen tree species.

The electrification of Arulmigu Sundara Mahalingam Swamy Thirukkovil by laying 11 KV HT XLPE underground Electric Cable will be detrimental to the ecological integrity of the area. The laying of the cable line would disturb the pristine forests and ecologically sensitive habitat of Nilgiri Tahr ^{and} it would destabilize the profile of the hilly slopes / soils. Further he accept the observations/ remarks made by the Deputy Director in his recommendation report. Hence, the proposal is not recommended.

Part-IV of the above proposal is enclosed herewith with remarks of Additional Principal Chief Conservator of Forests (FCA) /Nodal Officer as "Not Recommended".

Under the above circumstances the above proposal is not recommended.

Yours faithfully


for Principal Chief Conservator of Forests
(Head of Forest Force)
05/01/2023

PART IV

(To be filed in by the Nodal Officer or Principal Chief Conservator of Forests or Head of Forest Department)

Name of Work: Forests - Forest (Conservation) Act, 1980 - SMTR, Madurai Circle / Srivilliputhur Wildlife Division - Proposal for diversion of forest land of 0.2805 Ha for Erection of New HT XLPE UG Electric cable for electrification of Arulmigu Sundara mahalingam Swamy Thirukkoil located in Saptur RF - Online proposal submission by the User Agency ie. AE, TANG; EDCO, Saptur Section

Proposal No: (FP/TN/others/143759/2021)

17. Detailed opinion and specific recommendation of the State Forest Department for acceptance or otherwise of the proposal with remarks.

(While giving opinion, the adverse comments made by concerned Conservator of Forests or Deputy Conservator of Forests should be categorically reviewed and critically commented upon).

"Not Recommended"

Date: 26.12.2022
Place: Chennai

Signature:

[Handwritten Signature]
26/12/22 73

Name :
Official Seal:
Additional Principal Chief Conservator of
(Forest Conservation Act)/Nodal Officer

Forests



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