

**SITE INSPECTION REPORT OF DEPUTY DIRECTOR, SRIVILLIPUTHUR -
MEGAMALAI TIGER RESERVE (SMTR), SRIVILLIPUTHUR**

I 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 area requested by user agency for laying 11 KV HT XLPE underground Electric Cable towards Electrification of Arulmigu Sundara Mahalingam Swamy Thirukkovil from Vazhaithoppu pathway to Arulmigu Sundara Mahalingam Thirukkovil area across Saptur R.F is 0.28 ha. 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.

1. 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

2. 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, nilgiri tahr, grizzled squirrel and elephant habitats in Southern Western Ghats. The starting point of the project is Muniswaranpuli saragam, Valaithopu in Saptur beat IX which has tropical dry deciduous vegetation with high biodiversity value (Table 1). The cable passes through Vagai Marathu odai and Kurukku odai which is major water source for Anaikarai patti kanmai, Vandari Kanmai and Mainatthampatti Kanmai in surrounding villages in the foot hills. Then the path traverses in the valley between Sengaliparai mottai and Kathadu mottai on which nilgiri tahr sightings are very common. Then the path goes along Saklian odai and Padivetti Parai. The altitude increases from 179 m from the starting point to 407 m near Padivetti parai in about 1 km journey (228 m ascent). Padivetti parai is rocky portion devoid of vegetation beyond which again partially grassy and partially rocky area starts for some distance till Kodaiarai Parai.

After this point, starts a place called Pallakku mudangi, which is almost 70° slope. Then at an altitude of 747 m the cable path crosses a stream called Kuzhiratti odai in Kuzhiratti mottai 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 Koyya kanal. This entire stretch is rock portion and the Kuzhiratti stream in this portion runs only on rock for almost 9 to ten 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 Nilgiri Tahr habitat. Tahr uses this place for drinking water and move between hillocks. They move between hills called Sengaliparai and Kathadi mottai via Kambatthu mottai, Kuzhiratti mottai and Tiruge kallu (technically, paths connecting these hills form Nilgiri tahr corridor). Among these, electric cable passes through Kathadi mottai and Kuzhiratti mottai and Tiruge kallu for almost 2.5 km which is prime nilgiri tahr habitat in Saptu Reserve Forest (map 1 and table 2).

From Koyya kanal 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, Koyya kanal 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 Koyya kanal 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. Periyar Tiger Reserve > Velli Malai (Meghamalai Division, SMTR) > Palar (Meghamalai Division, SMTR) > Ammakasam > Sallimuttu (Meghamalai Division, SMTR) > **Karuvapillai Kedai (Srivilliputhur)** > Chinnaputhu (Pilavakal Beat II) > **Sasthakoil medu (Pilavakal beat II)** > Pulveli Kadu (Khansapuram I) > Pilavakal Dam > Peachikheni (Watrap beat I) > Kovilar Dam (Watrap beat- II) > Kotamalai (Kotamalai beat) > Saptur beat X > Chinnavali and Periya vali (Watrap beat IV) > Oorani kadai (Watrap beat IV) > Tiruge kallu (Saptur beat IX/X) > Ellai Kuttam (Saptur beat IX/X) > Koyya kanal (Saptur beat IX) > Kuruvi Kanal (Saptur beat IX) > Yanai Chelumbu

(Saptur beat V) > Kannimara kedai (Saptur beat V) > Paraikedai (Saptur beat VI) > Pacchiyathu kavu (Saptur beat VII/VIII)

2. Deviyar and Kottamalai Estate (Deviyar Beat) > Sastha Koil > Pravadiyar beat > Chinnayankotai (Kotamalai beat) > Amman 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 (Pilavakal 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.

Table 1. 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.	Nilgiri Thar	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 Plam 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.	Stripe necked 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

3. TEMPLE COMPLEX AND TOURIST FOOT FALL

Arulmigu Sundaramahalingam Swamy and Sandanamahalingam 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.

4. BIODIVERSITY CONCERNS

a. NILGIRI TAHR

Nilgiri tahr (*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.

WWF recently reported that during their recent Nilgiri tahr census some nilgiri tahrs are showing signs of sub-cutaneous tumor like growth of unknown etiology, in some cases tumors are large enough to cause potential danger to the animal. The mass are observed on the dorsolateral hip, thigh, hock joint, fetlock joint, neck, dorsum, face, hook, front canon etc. The size of the tumors varies from a small lemon to tennis ball. The mass may be of infectious (bacteria, virus or parasitic) or cancerous origin. It is unfortunate that, this abnormal growth has been observed in tahr populations of Mukurthi National Park (Yallamalai), Nilgiri Forest Division (Avalanchi and Varagapallam), Anamalai Tiger Reserve, Nellai Wildlife Sanctuary (Sunai parai) and Kanyakumari Wildlife sanctuary including Srivilliputhur-Megamalai Tiger Reserve (Thoppimalai, Srivilliputhur Division) (Fig 1, 2, 3 and 4). This disease has spread in an epidemic proportion in the entire range of Nilgiri Tahr in the state of Tamil Nadu. With the declining population diseases has emerged one of the important causes of extinction in wildlife, which is a cause of concern.

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 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 Nilgiri tahr, 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.



Fig 1. One of the tahr showing tumorous growth on the rump region (Srivilliputhur Division)



Fig 2. Tahr showing tumorous growth above stifle joint (Nellai Wildlife Sanctuary)



Fig 3. Tahr showing tumorous growth below left shoulder joint region (Mukurthi National Park)



Fig 4. Tahr standing right side showing tumorous growth in the right flank area. (Mukurthi National Park and Nilgiri Forest Division Boundary)

b. ELEPHANT

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. It was already discussed in section 1 that, when the Sabarimala Yatra starts in Kerala during Pongal/Makara Shankranthi 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. The proposed UG cable route passing through the heart of elephant corridor may endanger the habitat (discussed in the next section). 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. 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.

5. 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 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 Koyya kanal electric cable runs for almost 1.8 km, which is wet throughout the year.

Forest soils are 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 burst due to short-circuit in the underground cable on January 4, 2020.

6. 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. The relevant provisions of the guidelines with respect to the current project is listed below (serial numbers are mentioned as it is in the guidelines).

1.6 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;

2.2.10. 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.

2.3.1. 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.

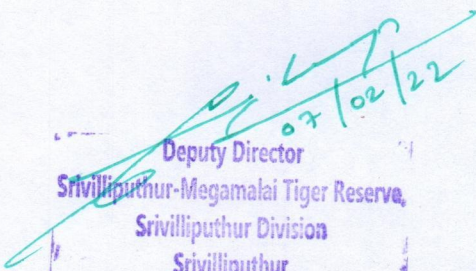
2.3.7. In order to allow free passage to wildlife, developments shall be sensitive to the conservation of flora and fauna, and the corridor value of the area in and around tiger reserves.

2.4.1. 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.

2.4.3. 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.

2.6 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.

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.


07/02/22
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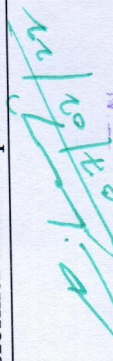
Map 1: Map showing area requested by user agency for laying 11 kV HT XLPE underground Electric Cable towards Electrification of Arulmigu Sundara Mahalingam Swamy Thirukkovil

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Table 2: Details of the site inspected and its important descriptions

Points	Latitude	Longitude	Altitude	Accuracy	Date and Time	Important description
Point 1	9.762496	77.673161	179	3.79	2022-01-09T10:32:45.773+0530	Muniswaranpuli saragam
Point 2	9.762281	77.67322	173	6.34	2022-01-09T10:34:10.979+0530	Dry deciduous vegetation
Point 3	9.762093	77.67311	178	6.09	2022-01-09T10:35:34.147+0530	Water spring
Point 4	9.761927	77.672997	180	6.59	2022-01-09T10:38:23.403+0530	Huge rocky boulders
Point 5	9.760388	77.672855	213	7.46	2022-01-09T10:44:03.705+0530	Rocky boulders
Point 6	9.760154	77.672551	218	6.52	2022-01-09T10:48:12.256+0530	Stream
Point 7	9.757463	77.67227	298	6.77	2022-01-09T11:05:47.906+0530	Rocky boulders
Point 8	9.757175	77.672271	310	9.94	2022-01-09T11:07:23.987+0530	Saklian odai (Stream)
Point 9	9.757023	77.672194	310	8.72	2022-01-09T11:09:39.127+0530	Saklian odai (Stream)
Point 10	9.756743	77.671914	327	5.64	2022-01-09T11:14:09.027+0530	Rock
Point 11	9.75639	77.671617	344	5.18	2022-01-09T11:19:41.414+0530	Sangili parai mottai-kambatthu mottai valley
Point 12	9.756066	77.670923	372	6.29	2022-01-09T11:35:55.295+0530	Rock
Point 13	9.755755	77.670237	407	10.37	2022-01-09T11:41:11.874+0530	Pativetti parai (Rock)
Point 14	9.755462	77.668527	481	5.82	2022-01-09T11:55:38.691+0530	Steep slope
Point 15	9.755524	77.668394	481	7.07	2022-01-09T11:56:38.595+0530	Steep slope
Point 16	9.755847	77.667589	538	6.28	2022-01-09T12:11:18.929+0530	Steep slope
Point 17	9.754305	77.665968	640	8.95	2022-01-09T12:47:17.636+0530	Kodaiiarai parai (Rock)
Point 18	9.754148	77.665586	663	3.8	2022-01-09T12:53:43.637+0530	Pallaku mudangi (Rock)
Point 19	9.754116	77.665513	669	3.79	2022-01-09T12:56:53.632+0530	Pallaku mudangi (Rock)
Point 20	9.753668	77.664783	700	6.44	2022-01-09T13:06:57.208+0530	Pallaku mudangi (Rock)
Point 21	9.753277	77.664559	725	6.06	2022-01-09T13:12:14.207+0530	Pallakumudangi Parai (Nilgiri Tahr habitat)
Point 22	9.752848	77.664532	747	9.94	2022-01-09T13:18:06.613+0530	Kuliratti (Nilgiri Tahr habitat)
Point 23	9.751573	77.663786	738	4.38	2022-01-09T13:28:13.729+0530	Kuluratti odai lower (Stream) (Nilgiri Tahr habitat)
Point 24	9.750754	77.663591	775	3.89	2022-01-09T13:46:35.200+0530	kuluratti upper (Nilgiri Tahr habitat)

Point 25	9.750497	77.66352	787	7.43	2022-01-09T13:48:41.812+0530	Kuluratti upper stream (Nilgiri Tahr habitat)
Point 26	9.750482	77.663518	782	6.78	2022-01-09T13:53:50.138+0530	Kuluratti upper stream (Nilgiri Tahr habitat)
Point 27	9.750204	77.662962	796	3.79	2022-01-09T14:02:14.136+0530	Kuluratti upper (Nilgiri Tahr habitat)
Point 28	9.748293	77.662588	854	3.79	2022-01-09T14:11:06.202+0530	Kuluratti upper (Leopard scat)
Point 29	9.747866	77.66258	857	3.73	2022-01-09T14:13:20.133+0530	Leopard pugmark
Point 30	9.747613	77.662558	854	4.25	2022-01-09T14:14:57.158+0530	Koyya kanal stream (Elephant Habitat)
Point 31	9.746272	77.66231	867	5.7	2022-01-09T14:18:13.301+0530	Elephant Habitat
Point 32	9.745689	77.662202	870	3.68	2022-01-09T14:20:09.459+0530	Koyya kanal odai (Stream) (Elephant Habitat)
Point 33	9.744342	77.661951	892	6.07	2022-01-09T14:27:24.861+0530	Elephant grazing signs (Elephant Habitat)
Point 34	9.743546	77.661449	917	7.43	2022-01-09T14:31:47.416+0530	Elephant Dung (Elephant Habitat)
Point 35	9.742988	77.658941	946	7.34	2022-01-09T14:44:09.812+0530	Junction of Saptur beat IX, V and WIV (Elephant Habitat)
Point 36	9.741254	77.656361	876	4.16	2022-01-09T15:05:26.498+0530	Transformer location (Elephant Habitat)
Point 37	9.736114	77.651741	774	4.6	2022-01-09T15:45:28.718+0530	Transformer location (Elephant Habitat)
Point 38	9.735902	77.651801	770	4.03	2022-01-09T15:47:26.613+0530	Transformer location (Elephant Habitat)
Point 39	9.735256	77.650729	751	4.16	2022-01-09T16:30:26.286+0530	Vellapalai odai (Stream) (Elephant Habitat)
Point 40	9.735246	77.650719	755	3.79	2022-01-09T16:30:53.482+0530	Vellapalai odai (Stream) (Elephant Habitat)
Point 41	9.733663	77.64821	726	7.15	2022-01-09T16:38:16.426+0530	Sonangan odai (Stream) (Elephant Habitat)
Point 42	9.733476	77.647856	725	4.61	2022-01-09T16:40:00.739+0530	Transformer and end point


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