



सत्यमेव जयते

भारत सरकार  
GOVERNMENT OF INDIA  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE  
समन्वित क्षेत्रीय कार्यालय  
INTEGRATED REGIONAL OFFICE  
Kendriya Sadan, IVth Floor, E& F Wings, 17<sup>th</sup> Main Road,  
IIInd Block, Koramangala, Bangalore – 560 034.  
Tel.No.080-25635901, E.Mail: ros.z.bng-mef@nic.in



**BY SPEED POST /E-MAIL**  
F.No.4-KRA1323/2021-BAN  
Dated the 5<sup>th</sup> April, 2023

145

To

The Additional Director General of Forests (FC),  
Ministry of Environment, Forests and Climate Change,  
Indira Paryavaran Bhavan,  
Aliganj, Jor Bagh Road,  
New Delhi – 110 003.

Subject: Diversion of 160.4 ha. of forest land in Sy.No.138 and 146 of Karlakatti village, Sy.No.128, 129 & 130 of Chakrageri village and Sy.No.3 & 4 of Kagihal village, Savadatti (Saundatti) Taluk, Belagavi District (Ghataprabha Division Gokak) for construction of Standalone Pumped Storage Component of Saundatti Integrated Renewable Energy Project (IREP) in favour of M/s. Greenko Solar Energy Private Ltd, Bengaluru (Online Proposal No. FP/KA/HYD/37723/2018) -reg.

Sir,

Kind attention is invited to Ministry's letter No.8-29/2021-FC dated 12/07/2022 wherein Stage-I / In-principle approval was accorded for the above project. The Government of Karnataka vide Letter No. FEE 57 FFM 2021 (e) dated 17/3/2023 addressed to IRO, Bengaluru has proposed change in part of the proposed non-forest land for Compensatory Afforestation (CA). It is reported that the User Agency had previously identified 160.4 ha of non-forest land for compensatory afforestation in Dhabaka village (381.18 acres or 154.26 ha) and Chimgaon village (17.00 acres or 6.88 ha) in Bidar district of Karnataka. However, only a part of the CA land (88.9 ha) identified has been acquired and remaining CA land as per User Agency could not be acquired due to non-availability of landowners, migration, lacunae in title and other legal issues. The newly proposed area is in Sy.Nos. 1/5, 1/7 & 1/9 of Kundacheri village (45.95 ha.) and Sy.Nos. 84/2 & 84/7 of Sannapulikotu village (32.15 ha.) of Kodagu District.

As per the DSS analysis carried out by this office, the proposed CA area is having dense vegetation. The proposed area was inspected by Smt. Praneetha Paul, DIGF(C) from 29/03/2023 to 31/03/2023 and the report delineating tenural /boundary/RF status/ encumbrances involved etc. in details is enclosed for further necessary action, please.

Yours faithfully,

(P. Subramanyam)

Deputy Director General of Forests (Central)

Encl: As above.

**Subject: Site Inspection Report of Alternate Land Identified for Compensatory Afforestation in Kodagu district, Karnataka, in lieu of Diversion of 160.4 ha of Forest Land in Ghataprabha Forest Division of Belagavi District for Construction of Standalone Pumped Storage Component of Saundatti Integrated Renewable Energy Project (IREP) in Favour of M/s. Greenko Solar Energy Private Limited, Bengaluru.**

**Background**

With reference to the Additional Chief Secretary to Government, Forest Ecology and Environment Department, Bengaluru, Letter No. FEE 57 FFM 2021 (e) dated 17/3/2023 addressed to the DDG (Central), IRO, Bengaluru on the above-mentioned subject, a site inspection was carried out by the undersigned from 29/3/23 to 31/3/23.

As per the above-mentioned letter, the Government of India vide Letter F.No.8-29/2021-FC dated 12/7/22 had accorded "in-principle" (stage-I) approval under section 2 of the Forest (Conservation) Act, 1980. The User Agency had previously identified 160.4 ha of non-forest land for compensatory afforestation in Dhabaka village (381.18 acres or 154.26 ha) and Chimgaon village (17.00 acres or 6.88 ha) in Bidar district of Karnataka. However, only a part of the CA land (88.9 ha) identified has been acquired. The remaining CA land as per User Agency could not be acquired due to non-availability of landowners, migration, lacunae in title and other legal issues. Hence, the User Agency has submitted alternative CA land to the tune of 78.14 ha in two locations in Kodagu District of Karnataka, the details are as given below.

To Gm-2  
5/4/23

Sl.no	District	Hobli	Village	Sy.No	Extent (ha)	Remarks
1	Kodagu	Bhagamandala	Kundacheri	1/5,1/7,1/9	45.95	Enclosure land of Pattiaghat Reserve Forest
2			Sannapulikotu	84/2, 84/7	32.15	Adjacent to Padinalku nadu Reserve Forest
Total					78.1 ha	

**Inspection Report.**

**Alternate Proposed Site No.1:**

- This site falls in the village Kundacheri of Bhagamandala Hobli in Kodagu district. As per the report of the PCCF (FC) and Nodal Officer (FCA), Karnataka, (Old File No. A5 (2). GFL.CR-27/2018-19. E-office File No.KFD/HOFF/A5-2 (GFL)/66/2018-FC dated 15/3/23) this site of 45.95 ha is within an Enclosure Land No.35, situated inside the Pattiaghat Reserve Forest Notification No.40 of Bhagamandala Zone, CPT 73, Dunkal

5/4/23

Patrol under Todikana Branch and adjacent to the Reserve Forest. The proposed sites namely, Survey No.1/9, Survey No.1/7 and Survey No.1/5 are present within this enclosure. In addition, Survey No.1/10 is also present within the enclosure, which is not a part of the proposed site. However, the letter of the Conservator of Forests, Kodagu circle addressed to the PCCF (FC), Karnataka (Letter No. A3/Bhumi/CR-01/2022-23 dated 8/3/23) does not mention any of the details of the proposed site.

- The SOI topo sheet updated in the year 2005-06 does not show the Enclosure No.35. However, the Working Plan office, Mysore in its survey of Pattighat Reserve Forest in the year 2018-19 (Copy of the Map attached as **Annexure-7**) have delineated Enclosure No.35 with Survey No.1/9, Survey No.1/7, Survey No.1/10 and Survey No.1/5 demarcated, within this enclosure. Hence, there is a discrepancy of facts mentioned in the SOI Topo Sheet and the Working Plan map. Moreover, there is discrepancy in the position of the Enclosure No.35 in the SOI Topo sheet and the Working Plan Map. As per the Working Plan map, the eastern boundary of the proposed sites (survey No.1/9, Survey No.1/7 and Survey No.1/5) have common boundary with the Pattighat Reserve Forest, however, in the SOI topo sheet the boundary of none of the three proposed sites is common with that of the Reserve Forest boundary.
- The site inspection report and site suitability report of the proposed site by the Conservator of Forests, Kodagu Circle and DCF, Madikeri is not enclosed with the proposal submitted to the IRO. However, discussion with the CF and DCF, Kodagu revealed that the CF, Kodagu vide Letter No: Bhomi/Greenko Project/CR-71/2022-23 dated 8/3/23 addressed to the PCCF (FC) and Nodal Officer had submitted a report mentioning the suitability of the site for transfer to the Forest Department. (Copy of the Letter attached as **Annexure -1**).
- In the CF, Kodagu's letter No: Bhomi/Greenko Project/CR-71/2022-23 dated 8/3/23, it has been mentioned that the private area with Sy.No.1/10 measuring 204.42 acres belonging to Smt. Nagaratnam's husband, K.H.Muniyappa (mentioned as N L Shruthi w/o M. Narasimhamurthy in RTC) is next to the proposed areas and shares a common boundary with Sy.No.1/9 (Map attached in page 807). Also RFO, Bhagamandala, vide letter no.81/V.A.A/B.V/2020-21 dated 5/6/2020 (copy of letter attached in page no.731) has mentioned boundary issues in Sy. No 1/10. Discussion with the field staff of Kodagu revealed that the owner of Sy.No 1/10 has requested for a joint survey of his area boundary. Hence, boundary discrepancies between Sy.No 1/10 and Sy.No.1/9 exists and needs to be sorted out.
- On examination of the RTC of Survey No. 1/5, 1/7 and 1/9, encumbrances in the form of loan taken by the owners from Vijaya Bank, Gonikoppa was noted in all the three RTC's. (Copy of the three RTC's attached as **Annexure -5**). The guideline issued under Forest (Conservation) Act, states that "In cases where non-forest land for CA is to be acquired by the User Agency through outright purchase from individual owners, submission of copy of the letter from each of the present owners of the land stating their willingness to sell the land to the User Agency for creation, at the time of submission of application for grant of Stage-1 approval under FC Act is required...". Copy of the letter from the present owner stating his/her willingness to sell the land to the User Agency is not submitted. Any form of agreement between the User Agency and Land Owner has also not been submitted. Also,

1/11/11

as the land has been pledged to Vijaya Bank, and the owner *per se*, does not technically own the land. Hence, the entire proposal of acquiring the land is a hypothetical case, till the mortgage is extinguished.

- Revenue records (Village FOR 19), Jamabandhi of 1911, shows that tenural classification of the Sy.No 1/7, 1/9 and 1/5 are “Redeemed Coffee area Malai” (copy of the Jamabandhi of 1911 is attached as **Annexure -6**). In all the three RTC’s (valid from 16/8/2017), the land tenure is mentioned as “Redeemed Sagu Land.” As the tenure system in Coorg is highly complicated, it is not clear if “Redeemed Sagu Land” can be alienated or not. Hence an irrevocable certificate may be obtained from the Government of Karnataka mentioning that “Redeemed Sagu Lands” can be alienated.
- In order to determine if the proposed areas namely Sy.no 1/5, Sy.no 1/7 and Sy.no 1/9 are included in the list of Deemed forests, a copy of the affidavit submitted to the Hon’ble Supreme Court by the Govt. of Karnataka was obtained from the Karnataka Forest Department (PCCF Working Plan office) and office of CF, Madikeri. The proposed areas namely Sy.no 1/5, Sy.no 1/7 and Sy.no 1/9 of Bhagamandala Hobli were not a part of the list. (Copy of the statement showing details of the Deemed forests is attached as **Annexure -2 and 3**).
- A copy of the RF notification of the Patti Ghat Reserve Forest from the Coorg District Gazette, June,1,1904 (attached as **Annexure -4**) mentions Survey Nos.1/7, 1/5 and 1/9 of Enclosure No.35 of Kundacheri village under the list of enclosures within the reserve.
- In order to rule out the possibility that the proposed areas are not part of any encroachments, discussion was carried out with CF, Working Plan (Mysore). The Working Plan office, Mysore had carried out survey in Pattighat Reserve Forest in the year 2018-19 (Copy of the Map and Lat long details attaches as **Annexure-7 and 8**), in which all the Enclosures within the Reserve had been demarcated. The survey was based on forest settlement map, village maps and possession. As per the map there seems to be no encroachments. However, a letter to this effect can be obtained from the CF and DFO (Madikeri).
- The proposed land namely Survey No. 1/5, 1/7 and 1/9, situated within Patti Ghat Reserve Forest comprises of moist deciduous to evergreen forests. The density varies from 0.6 to 0.7 with very thick vegetation. The terrain is highly undulating and the inspected areas did not show any form of cultivation in the recent past. The area is also widely used by elephants and seems to be a habitat for elephants as a lot of indirect evidences were found inside the area. The major list of tree species found inside the proposed area includes *Toona ciliate*, *Symplocos cochinchinensis*, *Antidesma menasu*, *Rapanea wightiana*, *Schefflera wallichiana*, *Elaeocarpus tuberculatus*, *Acacia caesia*, *Calamus thwaitessi*, *Careya arborea*, *Alstonia scholaris*, *Canthium dicoccum*, *Aporosa lindleyana*, *Ligustrum perrottetti*, *Fagraea ceilanica*, *Breynia retusa*, *Hardwickia binata*, *Cinnamomum verum*, *Cinnamomum zylanicum*, *Cinnamomum malabattrum*, *Leea indica*, *Wendlandia thyrusoidea*, *Litsea floribunda*, *Ochlandra travancorica*, *Artocarpus hirsutus*, *A. heterophyllus*, *Acrocarpus fraxinifolius*, *V.indica*, *C.strictum*, *S.cumini*, *S. caryophyllatum*, *S. oleosa*, *M.indica*, *Mesua ferrea*, *F.mysorensis*, *F.recimosa*, *Garcinia gummigutta*, *M.champaka* etc. (photos attached).

12/1

## Alternate Proposed Site No.2:

- This site falls in the village Sannapulikotu of Bhagmandala Hobli in Kodagu district. As per the report of the PCCF (FC) and Nodal Officer (FCA), Karnataka, (Old File No. A5 (2). GFL.CR-27/2018-19. E-office File No.KFD/HOFF/A5-2 (GFL)/66/2018-FC dated 15/3/23) this site of 32.15 ha is surrounded by private lands. A paisari land having an extent of 288 acres in Sy. No. 119/1 lies adjacent to this land and the Talacauvery Wildlife Sanctuary is located adjacent to the paisari land. The letter of the Conservator of Forests, Kodagu circle addressed to the PCCF (FC), Karnataka (Letter No. A3/Bhumi/CR-01/2022-23 dated 8/3/23) mentions all details of the proposed site.
- On examination of the RTC of Sy.no 84/2 and Sy.no 84/7, no encumbrances were found. In both the RTC's, the type of land tenure mentioned is "Redeemed Sagu Lands". (Copy of the two RTC's attached as **Annexure -10**). As the tenure system in Coorg is highly complicated, it is not clear if "Redeemed Sagu Lands" can be alienated or not. Hence an irrevocable certificate may be obtained from the Government of Karnataka mentioning that "Redeemed Sagu Lands" can be alienated.
- Moreover, the guideline issued under Forest (Conservation) Act states that "In cases where non-forest land for CA is to be acquired by the User Agency through outright purchase from individual owners, submission of copy of the letter from each of the present owners of the land stating their willingness to sell the land to the User Agency for creation, at the time of submission of application for grant of Stage-1 approval under FC Act is required...". Copy of the letter from the present owner stating his/her willingness to sell the land to the User Agency is not submitted in the proposal. Any form of agreement between the User Agency and Land Owner has also not been submitted. Hence, the entire proposal of acquiring the land is a hypothetical case.
- The site inspection report and site suitability report of the proposed site by the Conservator of Forests, Kodagu Circle and DCF, Madikeri is not enclosed with the proposal submitted to the IRO. However, discussion with the CF and DCF, Kodagu revealed that the CF, Kodagu vide Letter No: A3/Bhumi/CR-01/2022-23 dated 8/3/23 addressed to the PCCF (FC) and Nodal Officer had submitted the Site Inspection Report and Site Suitability Report of both the proposed sites namely Kundacheri and Sannapulikotu. (Copy of the Letter attached as **Annexure -9**).
- In the SOI topo sheet also, the proposed area is shown outside the demarcated forest area.
- In order to determine if the proposed areas namely Sy.no 84/2 and Sy.no 84/7 are included in the list of Deemed forests, a copy of the affidavit submitted to the Hon'ble Supreme Court by the Govt. of Karnataka was obtained from the Karnataka Forest Department (PCCF Working Plan office) and office of CF, Madikeri. The proposed areas namely 84/2 and Sy.no 84/7 of Bhagamandala Hobli were not a part of the list. (Copy of the statement showing details of the Deemed forests is attached as **Annexure -2 and 3**).
- The Geo-referenced map of the proposed site (Sy.no 84/2 and Sy.no 84/7) along with the latitude and longitude, duly attested by the DRFO cum Surveyor, RFO and ACF Bhagmandala is attached with the proposal. (Copy attached as **Annexure-11**). A certificate may be obtained from the User Agency and the Government of Karnataka, to ensure that there are no boundary disputes with adjacent land owners.



- The proposed land namely Sy.no 84/2 and Sy.no 84/7, comprises of moist deciduous to evergreen forests. The density varies from 0.6 to 0.7 with very thick vegetation. The terrain is mildly undulating with gentle slopes and the inspected areas did not show any form of cultivation in the recent past. The area is also widely used by elephants and seems to be a habitat for elephants as a lot of indirect evidences were found inside the area. The major list of tree species found inside the proposed area includes *Elaeocarpus tuberculatus*, *Alstonia scholaris*, *Canthium dicoccum*, *Toona ciliate*, *Symplocos cochinchinensis*, *Antidesma menasu*, *Rapanea wightiana*, *Schefflera wallichiana*, *Persea macrantha*, *Acacia caesia*, *Calamus thwaitessi*, *Careya arborea*, *Alstonia scholaris*, *Canthium dicoccum*, *Aporosa lindleyana*, *Ligustrum perrottetti*, *Fagraea ceilanica*, *Breynia retusa*, *Hardwickia binata*, *Cinnamomum verum*, *Cinnamomum zylanicum*, *Cinnamomum malabattrum*, *Leea indica*, *Wendlandia thyruoidea*, *Litsea floribunda*, *Ochlandra travancorica*, *Artocarpus hirsutus*, *A. heterophyllus*, *Acrocarpus fraxinifolius*, *V.indica*, *C.strictum*, *S.cumini*, *S. caryophyllatum*, *S. oleosa*, *M.indica*, *Mesua ferrea*, *F.mysorensis*, *F.recimosa*, *Garcinia gummigutta*, *M.champaka* etc. (photos attached).

  
(Praneetha Paul) 5/4/23

Dy. Inspector General of Forests (C),  
IRO, MoEF&CC, Bengaluru

Date of site inspection- 29/03/2023 to 31/03/2023

Date of submission of report -05/04/2023

Plate No. 1: Photograph showing the CA land identified at Kundacheri village (1/5,1/7,1/9)

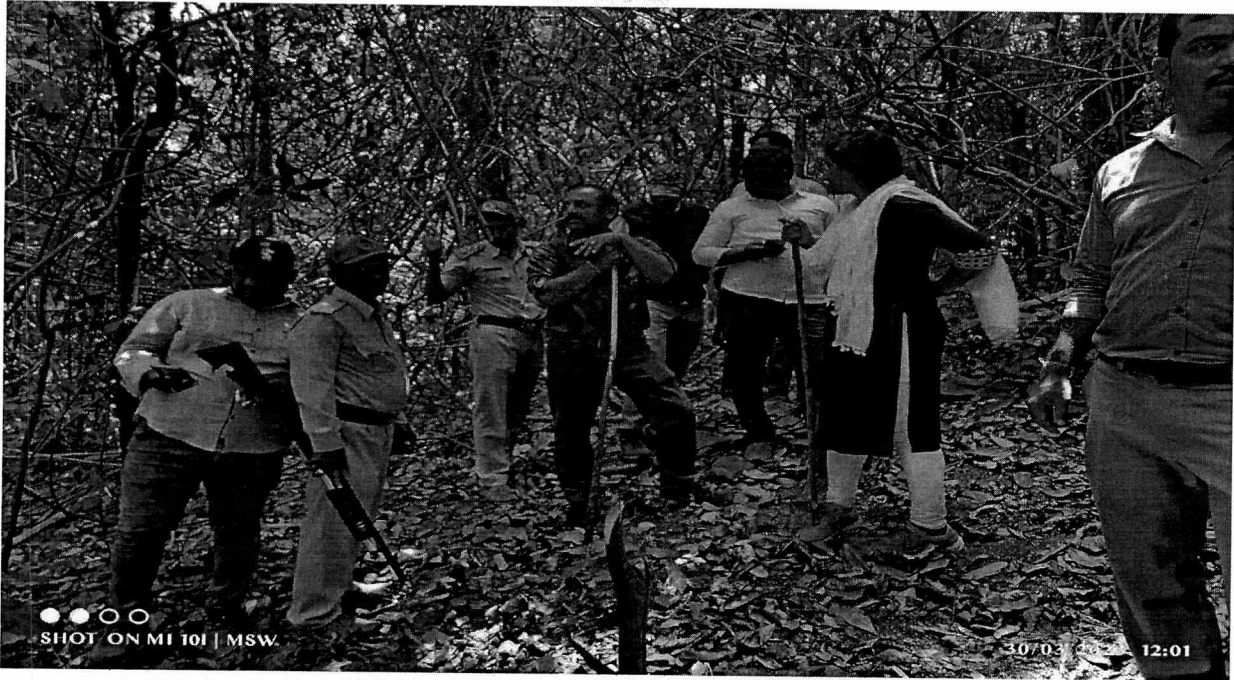


Plate No. 2: Photograph showing the CA land identified at Sannapulikutu village (84/2, 84/7)





(1054)

# GIS-DSS ANALYSIS

(DR-1= DECISION RULE-1, DR-2= DECISION RULE-2, OF=OPEN FOREST CATGEORY, MDF=MODERATE DENSE FOREST CATGEORY, VDF= VERY DENSE FOREST CATEGORY)

## DETAILS OF THE CA GREENKO ENERGY

KUNDACHERY 45.95 HA

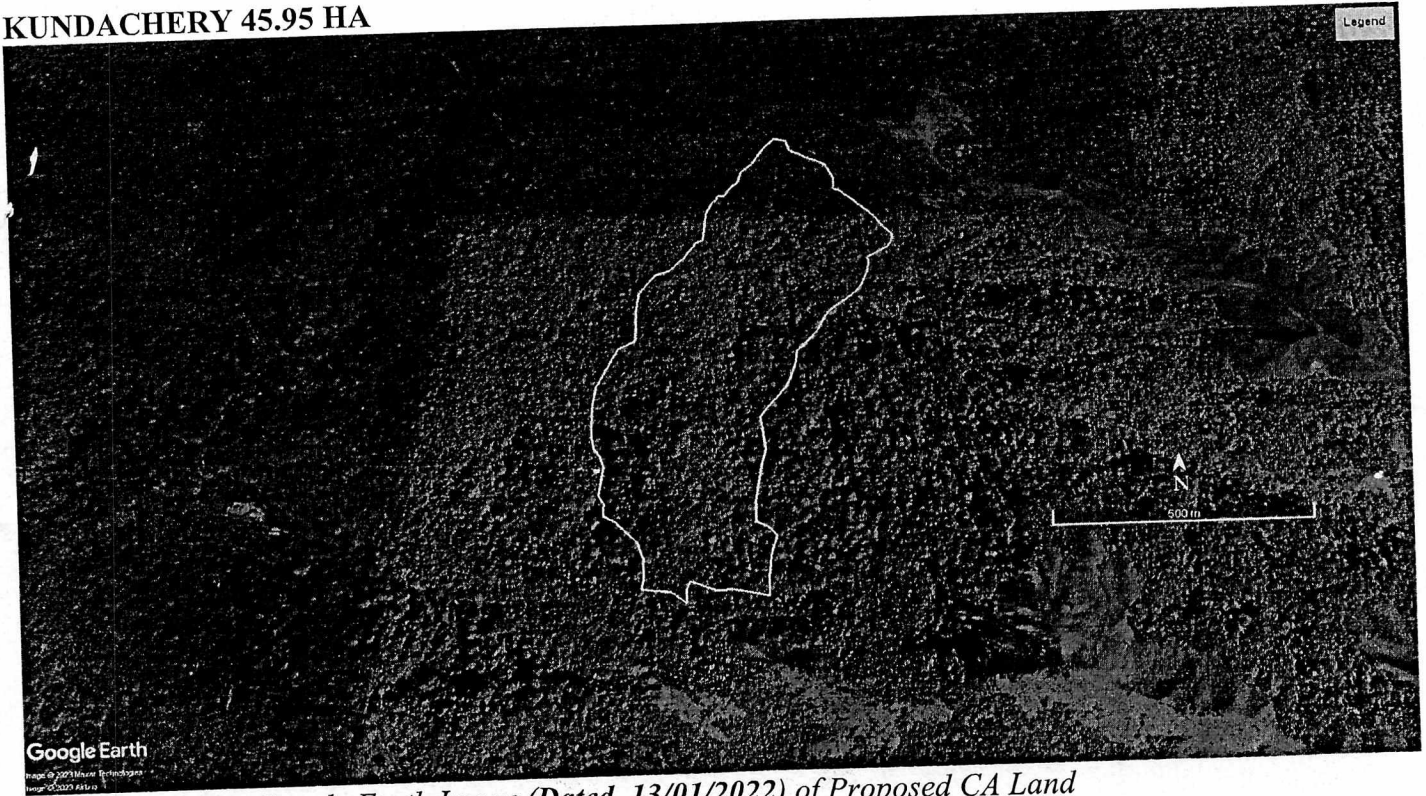


Figure: Google Earth Image (Dated. 13/01/2022) of Proposed CA Land

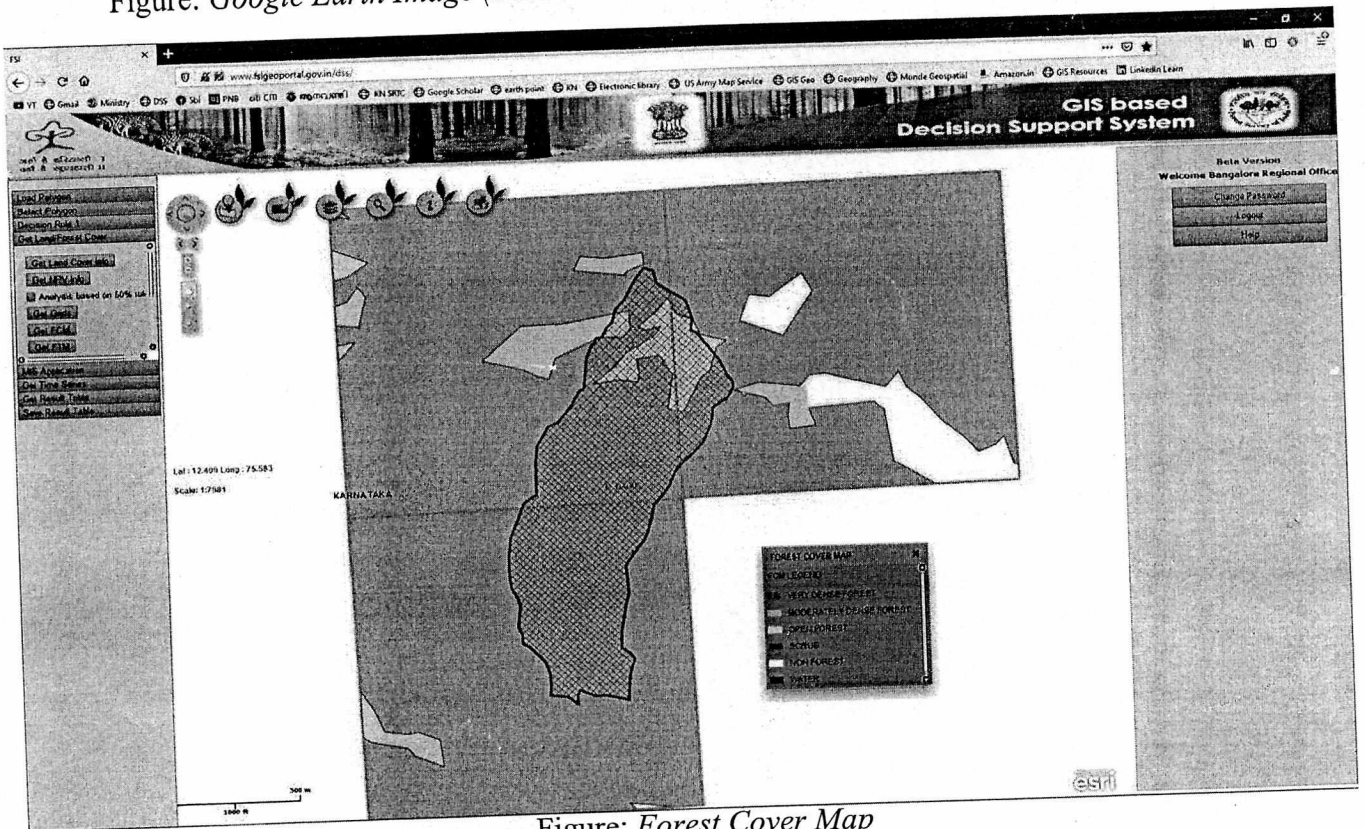


Figure: Forest Cover Map

# GIS-DSS ANALYSIS

(DR-1= DECISION RULE-1, DR-2= DECISION RULE-2, OF=OPEN FOREST CATGEORY, MDF=MODERATE DENSE FOREST CATGEORY, VDF= VERY DENSE FOREST CATEGORY)

## SANNAPULIKUTU 32.15 HA



Figure: Google Earth Image (Dated. 13/01/2022) of Proposed CA Land

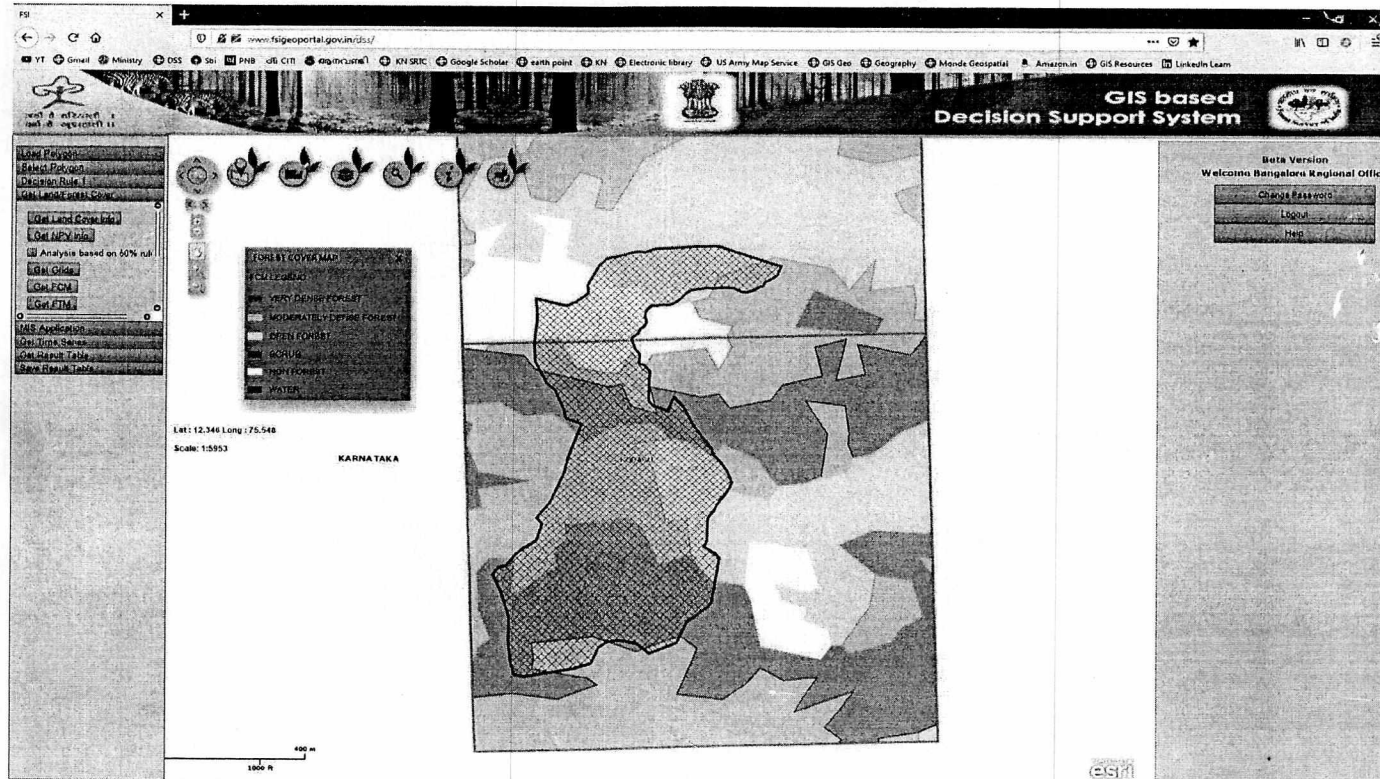


Figure: Forest Cover Map