

Government of India
Ministry of Environment, Forest and Climate Change
(Forest Conservation Division)

Indira Paryavaran Bhawan,
Jor Bag Road, Aliganj,
New Delhi – 110003
Dated: June, 2023

To,

The Principal Secretary (Forests),
Government of Madhya Pradesh,
Bhopal.

Subject: Diversion of 2272.05 ha forest land for construction of Morand - Ganjal Irrigation Project located in Hoshangabad, Betul, Harda and Khandwa Districts of Madhya Pradesh State in favour of M/s Narmada Valley Development Authority (Online No. FP/MP/IRRIG/36231/2018) – regarding.

Madam/Sir,

I am directed to refer the PCCF (LM) and Nodal Officer, FCA, 1980, Govt. of Madhya Pradesh letter no. F-3/16/2018/10-11/1667 dated 26.04.2023 forwarding a fresh proposal on the above subject seeking prior approval of the Central Government under Section-2 of the Forest (Conservation) Act, 1980. After examining the proposal, the following shortcomings have been observed:

- i. The basic details of proposed dam like its height, length, hydrological assessment etc. along with detailed project report shall be submitted.
- ii. The site specificity of the proposal shall be re-examined and a detailed report along with justification as to why the project cannot be located in non-forest area shall be submitted.
- iii. The details of the alternative sites examined along with KML files shall be submitted.
- iv. The plan along with details for further distribution of water to end users shall be submitted. In case additional forest land is required for distribution of water, the details of the same shall be provided.
- v. The copy of CAT plan as submitted does not mention that the same is approved by the Principal CCF & HoFF or any other officer authorized by him for the purpose as prescribed under the Chapter-9 at para 9.2(vi) of Comprehensive Guideline Handbook, 2019. The same needs to be submitted.
- vi. The extant proposal is for an irrigation project, however as per the component wise break up forest land has been proposed to be used for quarrying. The justification for setting up of quarry in the instant irrigation project along with approved mining plan shall be submitted.
- vii. The proposal involves the rehabilitation of people and the State Govt. has reported 644 number of families being displaced due to the instant project whereas the DFO, Harda in its Site Inspection Report has reported that 1075 individuals would be displaced. This

variation needs to be rectified and actual numbers may be intimated along with the copy of approved R&R plan.

- viii. The CCF, Betul and the CF, Narmadapuram in their Site Inspection report have mentioned that the forest land proposed for diversion forms a part of an active wildlife corridor utilized by wild animals (Tiger, Panther, etc.). The project execution may therefore lead to habitat fragmentation and cause obstruction in the corridor. Therefore, the State Government shall submit the comments of the Chief Wildlife Warden along with availability of alternative wildlife corridors in order to mitigate the detrimental effects of submergence of proposed forest land. It is further required to submit wildlife conservation plan approved by CWLW.
- ix. The Cost Benefit analysis has been calculated on the old NPV rates. The same is required to be submitted in the prescribed format keeping in view the latest rates of NPV.
- x. The recommendation of CCF/ CF, Khandwa, Part-III has not been found uploaded online and same shall be uploaded.
- xi. As per the project report the total forest area required in the project is 2270.89 ha, the FRA certificate have been issued by the respective district collectors for an area of 2410.335 ha and the online proposal has been submitted for an area of 2272.05 ha. This discrepancy in the area figures shall be examined and factual position shall be intimated.
- xii. The instant proposal is for diversion of 2272.05 ha forest land wherein the State Govt. has reported that the project is likely to be executed in a phased manner. Therefore, the phase wise details along with component wise breakup shall be submitted.
- xiii. It has been informed that the District Collectors, Sagar, Betul, Agar Malwa and Jabalpur have reserved land for carrying out CA in the instant proposal. However, after examination of the same it has been found that as per District Collector, Betul vide their order dated 25.09.2018 an area of 662.00 ha of land has been reserved for CA out of which an area of 386.469 ha is proposed for CA against the instant proposal in Tehsil Betul, Amla and Godhadungri. However the land type of proposed CA is recorded as Forest land, Bade Jhar ka Jungle. Also as per District Collector, Sagar vide their order dated 18.09.2018 an area of 1071.99 ha of land has been reserved for CA and same is proposed for CA against the instant proposal. However the land type of proposed CA in Tehsil Kesli, Village – Padhna Khurd, Chirai, Rengajholi is recorded as Government Forest land. Further the land type (Bhumi Noiayath) of CA land is not recorded in District Collector, Jabalpur order dated 18.02.2019. Therefore, the State Government shall clarify that whether such lands proposed for CA does not comes in the ambit of Forest (Conservation) Act, 1980 and justify these lands as NFL.
- xiv. The approved CA scheme along with site suitability certificates from the concerned DFO shall be submitted.
- xv. As per DSS analysis, it has been observed that:
 - a. The area of forest land proposed for diversion is found to be 1923.313 ha instead of 2272.05 ha as proposed. Therefore, the correct KML file as per the proposal needs submission.

- b. High resolution satellite imagery shows the presence of Agricultural land and Settlements within the forest patches sought for diversion. Why such settlements and land use may not be considered as violation. This needs clarification.
 - c. The complete KML file of submergence area/ Non-forest land involved in the project i.e. 1277.694 ha on the PARIVESH portal. The same needs submission.
 - d. The total area of proposed CA land through KML file is found 2540 ha whereas the State Govt. reported CA area of 2407.189 ha. Therefore, the State Govt. shall provide the correct KML file of CA area as per the actual records/ orders.
 - e. Satellite imagery shows the presence of Settlements/ Built-up in the CA areas located in Villages jaitpur kachhaya (35 ha) & Donger salaiya (100 ha). Moreover, an earthen dam also exists within the proposed CA site at village Donger salaiya. This needs clarification.
 - f. Satellite imagery shows the presence of Settlements/ Built-up, Agriculture land, earthen dam, Road, play ground in the entire CA sites proposed in Village Chirrari. This needs clarification.
 - g. Satellite imagery shows the presence of earthen dam and canals at the CA sites proposed in villages Bhuhara, Chak vileki and Vileki. Moreover, presence of Agriculture land can also be seen in the 601.58 ha land proposed for CA. This needs clarification.
 - h. Part of CA site is falling on the submergence of an earthen dam, having the presence of settlements/ town, construction of check dam is also going on in the proposed CA site. Moreover, part of mined out area is also visible within the proposed CA site at village Khamkua. This needs clarification.
 - i. Presence of Settlements and Agriculture land can be seen at proposed CA site at Village Sahajpuri kalan. This needs clarification.
 - j. An earthen dam is located within the proposed CA site at Village Tirmahu. This needs clarification.
 - k. All proposed CA site at Villages Gopalpura, Gandhigram, Sukadhana, Sobhapur, Pandra, Bodna, Mordongri and Chapada rayat are having presence of Agriculture land and an earthen dam with settlements over 44 ha CA site. Moreover, plantation works are visible within the 60 ha area of proposed CA site. This needs clarification.
 - l. Mining is going on near the proposed CA site village Barguwan. Therefore, the State Govt. shall ensure that the proposed CA site is not the part of Mine lease.
 - m. Part of proposed CA site at Village Shyampura & Garda are having presence of settlements within the CA boundary. Moreover, part of proposed CA land is also falling on the submergence zone of existing earthen dam. This needs clarification.
 - n. Plantation work and some pre-plantation operations are visible within the proposed CA site at Village Dongargaon & Bid Madhopur. Moreover, part of CA site at village Dongargaon is falling on the submergence zone of an earthen dam. This needs clarification.
 - o. It is also learnt the user agency/ State Govt. has uploaded many KML files of the CA land in the line feature instead of Polygon on the PARIVESH. Further, proper annotation/ attributes to each KML file of CA land has not been mentioned due to which it is very difficult to identify and locate CA land KML file with respect to their villages & Khasra Nos. The same shall be resubmitted and rectified.
- xvi. The proposed CA area are not free from encumbrances as per above observations from DSS analysis. A justification may be provided for identifying such land and State Government may comment that is there any requirement for rehabilitation & resettlement of people from the identified CA lands.

- xvii. The State shall also specifically mention the plan to protect the identified CA land from encroachment in future. A detailed plan shall be submitted accordingly.
- xviii. The complete lay out plan along with KML files indicating all the components like canal, Quarry Area etc. shall be submitted.
- xix. As per the technical approval dated 18.10.2017 it has been mentioned that the Morand Dam will be constructed in Phase-I and if the water requirement gets fulfilled by the same in that case the construction of Ganjal will not take place. Moreover the Indira Sagar Dam is located at a distance of 54.40 Km from the proposed forest diversion site for Harda Dam and Tawa Reservoir is located at a distance of 34.33 Km from the proposed forest diversion site for Morand Dam. In this regard, specific reasons for proposing the construction of instant dams are required.

Accordingly, it is requested to furnish the above mentioned information to this Ministry for further consideration of the proposal.

Yours sincerely,

(Dr. Dheeraj Mittal)

Assistant Inspector General of Forests

Copy to:

1. The PCCF (HoFF), Department of Forest, Government of Madhya Pradesh, Bhopal;
2. The Regional Officer, Integrated Regional Office, MoEF&CC, Bhopal;
3. The Nodal Officer (FCA), Department of Forest Government of Madhya Pradesh, Bhopal;
4. User Agency;
5. Monitoring Cell, FC Division, MoEF & CC, New Delhi for uploading on PARIVESH portal.