

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

Indira Paryavaran Bhawan
Aliganj, Jor Bagh Road
New Delhi- 110003
Dated: 02-09-2025

To
The Principal Secretary (Forests)
Government of Maharashtra
Mumbai.

Subject: Proposal for seeking prior approval of the Central Government under Section 2 (i) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 in favour of JSW Energy PSP Two Limited for non-forestry use of 243.74 ha. of forest land (reserved Forest, Protected Forest and Private Forest) for Bhavali Pumped Storage Project (1500 MW) in Thane & Nasik District in the State of Maharashtra (Online proposal No. FP/MH/HYD/153240/2022) – regarding.

Madam/Sir,

I am directed to refer to the Govt. of Maharashtra's letter No. FLD-1225/CR-101/F-10 dated 05.08.2025 on the proposal mentioned in above subject seeking prior approval of the Central Government in accordance with Section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980. In this regard, after examination of the proposal in the Ministry, the following shortcomings has been observed in the proposal:

- i. The component wise breakup provided by the State Govt. vide letter dated 05.08.2025 is different from the component wise breakup uploaded in the part-1 of the application form by the project proponent. The State shall examine the matter and ensure that the correct component wise breakup is uploaded in the portal.
- ii. As per component wise breakup uploaded on the portal an area of 44.9 ha is proposed for Dumping area/job facilities 1&2 and an area of 4.8 ha is for working space which are non-site specific activities. The state shall explore and locate such facilities over non forest land.
- iii. As per DSS Analysis of the KML files provided by the State Govt., the total software calculated area in the project is 309 Ha., which includes, forest and non forest land. Further, for an area of 13.814 Ha, the details are not provided along with the KML file. Accordingly, the State Government shall provide the component wise correct KML files for the project area.
- iv. The State government has recommend the proposal with condition that

User Agency shall obtain wildlife clearance and/or ensure compliance of mitigation measures, if required or suggested by the PCCF (Wildlife). Accordingly, the State Government is requested to submit the comments of the PCCF (Wild Life)/CWLW.

- v. It has been submitted by the DFO Shahapur and West Nashik that recently the Government of Maharashtra has declared Gut. No. 42 of Village Jamunde, Teshil- Igatpuri, District- Nashik as part of Igatpuri Conservation Reserve as per notification dated 22.11.2022. The state shall intimate whether the requisite conservation reserve management committee has been formed and whether the requisite approvals as applicable have been obtained or not?
- vi. The Harishchandra Gad Wildlife Sanctuary and its ESZ is located 2.21 Kms and only 12.5 meters away respectively from the closest point on the boundary of the project. State Government shall ensure that the proposed area is actually outside the boundary of ESZ. A detailed report in this regard shall be submitted.
- vii. DFO West Nashik recommended that in the case of land that were allotted prior to 1980, lying in the project area, the user agency shall not utilize/acquire said land parcel without a separate/additional diversion proposal. However, no details of such areas has been provided. A detailed report shall be submitted in this regard. Accordingly, the State Government shall ensure that entire forest land is included in the proposal and a comprehensive proposal is submitted.
- viii. The CCF, Nashik in his recommendations recommended that a Wildlife Management and Mitigation Plan must be prepared and implemented in accordance with the guidelines and approval of the Chief Wildlife Warden (CWW), Maharashtra. State Government is requested to provide comments on the same.
- ix. The CCF Nashik further recommends that a scientifically designed Catchment Area Treatment (CAT) Plan shall be implemented to prevent soil erosion, enhance water retention, and promote vegetative regeneration in the catchment area. However, the copy of the plan approved by the competent authority for the entire area has not been submitted.
- x. The CCF Nashik, has recommended that a detailed study regarding the suitability and safety of tunnel construction must be conducted by a national-level institute of repute, specializing in hydro-geological and tunnel engineering. State Govt. shall provide the details/comments in this regard.
- xi. State Government has mentioned in its covering letter that felling of 69100 trees is involved in the proposal. However, in online Part- II, enumeration of 1,78,677 trees in Shahapur Division and 20,704 trees in West Nashik Division has been submitted. Exact number of trees to be felled needs to be submitted along with tree enumeration list at FRL-2 and FRL-4 meters.
- xii. Further, the State Government shall provide a copy of approval of the

National Dam Safety Authority (NDSA) on the recommendations made by the State Dam Safety Organisation (SDSO) and submit the same as applicable.

- xiii. Since both the dams are to be constructed afresh, the justification for the site specificity of the project is required to be provided. The State shall provide the compete details including KML files, forest and non forest area involved, trees involved along with the reasons for the rejection of various alternatives.
 - xiv. It has been mentioned that project is not located near any river/waterbody. The state shall give a detailed report as to how the requirement of water and electricity will be met.
 - xv. The state shall provide the details of the power evacuation plan and in case additional forest land is required for the same a consolidated proposal may be submitted for the entire forest area.
2. In view of above, the State Government is requested to furnish the above mentioned information to the Ministry for further consideration of the proposal.

Yours faithfully,

Sd/-

(Suneet Bhardwaj)

Assistant Inspector General of Forests

Copy to:-

1.

PCCF (HoFF), Department of Forest, Government of Maharashtra, Mumbai.
2.

DDGF (Central), MoEF&CC's Regional Office, at Nagpur.
3.

APCCF—cum-Nodal Officer, Government of Maharashtra, Nagpur.
4.

User Agency.
5.

Monitoring Cell, FC Division, MoEF&CC, New Delhi for uploading.