

I/163469/2023

**GOVERNMENT OF TELANGANA
FOREST DEPARTMENT**

From
Sri R.M.Dobriyal IFS.,
Principal Chief Conservator of Forests
& Head of Forest Force,
Telangana State, "Aranya Bhavan",
Saifabad, **Hyderabad.**

To
The Spl. Chief Secretary to Government,
Forests Department,
Telangana State,
Hyderabad.

Ref.No.FC4/FC29/1/2022 Dated:03/07/2023.

Madam,

Sub: TSFD -FC(A)ct, 1980- Diversion of 151.8517 Ha of forest land falling in Yellandu division for proposed Jawahar Khani OC project at Yellandu division in favour of M/s Singareni Collieries Company Limited - **Additional Information Sought by Gol, MoEF & CC, New Delhi-Information Furnished** -Regarding.

- Ref:**
1. General Manager, Yellandu Area, SCCL, Bhadradi Kothagudem District Ref.No.YLD/EST/185 dt.25.04.2021.
 2. PCCF RC.No.20207/2019/FCA-1/PS Dt.18.05.2021.
 3. DFO, Bhadradi Kothagudem Rc.No.109/2020/D1 Dt.19.06.2021 addressed to CF,Kothagudem.
 4. PCCF RC.No.20207/2019/FCA-4 Dt.09.08.2021.
 5. CCF, Kothagudem Rc.No.125/2020/M3 dt:02.12.2021.
 6. CCF.Kothagudem Rc.No.168/2022/M11 dt:06.04.2022.
 7. PCCF Rc.No.FC4/FC29/1/2022 Dt.26.04.2022.
 8. GoTS Lr.No.3219/For.I(1)/2022 dated 06.06.2022.
 9. AIGF, Gol, MoEF & CC, New Delhi FC division F.No.8-260/1985-FC(Vol.I) dated 27.07.2022.
 - 10.Forest (Conservation) Rules,2022 published vide MoEF&CC, Gol, New Delhi Gazette Number GSR 480 (E), Dt.28.06.2022 and communicated in MoEF&CC, Gol, New Delhi F.No.FC-11/118/2021-FC, Dt.29.06.2022
 - 11.MoEF&CC, Gol, New Delhi F.No.FC-11/118/2021-FC, Dt.18.07.2022.
 - 12.Minutes of Meeting of Forest Advisory Committee Dt.15.07.2022 communicated in MoEF&CC, Gol, New Delhi File No.11-91/2012FC on 27.07.2022.
 - 13.Director (Planning & Projects), SCCL ref.no.CRP/EST/F/164/849 dated 01.08.2022.
 - 14.PCCF-FC4/FC29/1/2022-FCA Section (20207/2019/FCA-4), Dated: 23.08.2022.
 - 15.AIGF, Gol, MoEF & CC, New Delhi FC division F.No.8-260/1985-FC(Vol.I) dated 13.09.2022
 - 16.PCCF Rc.No.FC4/FC29/1/2022 dated 20.10.2022.
 - 17.Gol, MoEF & CC, New Delhi FC division F.No.FC-11/118/2021-FC dated 14.11.2022.
 - 18.Minutes of 1st project Screening Committee (PSC) meeting held on 19.11.2022.
 - 19.AIGF, Gol, MoEF & CC, New Delhi FC division F.No.8-260/1985-FC(Vol.I) dated 29.11.2022.
 - 20.PCCF Rc.No.FC4/FC29/1/2022 dated 04.12.2022.
 - 21.AIGF, Gol, MoEF&CC, New Delhi, F.No.8-260/1985-FC(Vol.I), Dt.18.01.2023.

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22.PCCF Rc.No.FC4/FC29/1/2022 dt.18.01.2023.

23.CCF, Bhadradi circle Rc.No.125/2020/M3/DM dt.26.05.2023.

Vide ref 21st cited, the Gol, MoEF & CC, New Delhi has sought additional information on the subject proposal for further consideration of the proposal.

Accordingly, vide ref 23rd cited, the Chief Conservator of Forests, Bhadradi Circle has furnished the information as desired by the Gol, MoEF & CC, New Delhi which are furnished as follows, with remarks:

S. No	EDS Sought	Reply																																
i.	The State Govt. is requested to submit the component wise (Landuse) KML file and DGPS map of proposed forest area for diversion	<p>M/s.SCCL has informed that the proposed land will be used for following purpose:</p> <table border="1" data-bbox="906 819 1398 1406"> <thead> <tr> <th data-bbox="906 819 978 891">S.No</th> <th data-bbox="978 819 1238 891">Description</th> <th data-bbox="1238 819 1398 891">Extent</th> </tr> </thead> <tbody> <tr> <td data-bbox="906 891 978 992">1</td> <td data-bbox="978 891 1238 992">Total Excavation Area</td> <td data-bbox="1238 891 1398 992">115.6001</td> </tr> <tr> <td data-bbox="906 992 978 1032">2</td> <td data-bbox="978 992 1238 1032">Embankment</td> <td data-bbox="1238 992 1398 1032">1.409</td> </tr> <tr> <td data-bbox="906 1032 978 1072">3</td> <td data-bbox="978 1032 1238 1072">Toe Wall</td> <td data-bbox="1238 1032 1398 1072">0.482</td> </tr> <tr> <td data-bbox="906 1072 978 1113">4</td> <td data-bbox="978 1072 1238 1113">Settling Pond</td> <td data-bbox="1238 1072 1398 1113">3.5318</td> </tr> <tr> <td data-bbox="906 1113 978 1184">5</td> <td data-bbox="978 1113 1238 1184">Diversion/below river/Nala/Canal</td> <td data-bbox="1238 1113 1398 1184">0.3510</td> </tr> <tr> <td data-bbox="906 1184 978 1225">6</td> <td data-bbox="978 1184 1238 1225">Garland Drains</td> <td data-bbox="1238 1184 1398 1225">2.2338</td> </tr> <tr> <td data-bbox="906 1225 978 1265">7</td> <td data-bbox="978 1225 1238 1265">Plantation</td> <td data-bbox="1238 1225 1398 1265">24.43</td> </tr> <tr> <td data-bbox="906 1265 978 1364">8</td> <td data-bbox="978 1265 1238 1364">7.5m safety zone along the periphery</td> <td data-bbox="1238 1265 1398 1364">3.8142</td> </tr> <tr> <td colspan="2" data-bbox="906 1364 1238 1406">Total</td> <td data-bbox="1238 1364 1398 1406">151.8519</td> </tr> </tbody> </table> <p>DGPS map & Components wise KML files for land use proposed for diversion are enclosed.</p>			S.No	Description	Extent	1	Total Excavation Area	115.6001	2	Embankment	1.409	3	Toe Wall	0.482	4	Settling Pond	3.5318	5	Diversion/below river/Nala/Canal	0.3510	6	Garland Drains	2.2338	7	Plantation	24.43	8	7.5m safety zone along the periphery	3.8142	Total		151.8519
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ii.	The State Govt. is requested to submit the KML file of Yellandu mining lease (524.96 ha), Yellandu additional mining lease (1741 ha), JK OC mine (1114.507 ha) and earlier diverted 167. 46 ha (124.96 ha + 42.50 ha).	<p>M/s.SCCL has submitted the kml files as desired.</p> <ol style="list-style-type: none"> 1. Yellandu mining lease (524.96 ha) (FL-124.96 Ha + NFL- 400 Ha) 2. Yellandu Additional mining lease (1741 Ha) (FL- 71.5 Ha+ NFL- 1669.5Ha) 3. JK OC mine (1114.507 ha) includes 167.46 Ha (124.96 Ha + 42.50 Ha) diverted for UG rites are <i>enclosed</i>. <p>The area of the proposed diversion is falling in Yellandu ML which is</p>																																

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		valid till 31.12.2034. Copy of the Government Order for granting Mining Lease is also enclosed.
lii	The State Govt. is requested to submit the KML file of CA land in lieu of 1.5 times of proposed safety zone.	M/s.SCCL has informed that the Safety zone area of 7.5mts is already included in the proposed diverted forest land of 151.8519 Ha within the project. Regarding the 1.5 times safety zone, the SZA is included in the DFL area identified in Mahabubabad District as part of CA scheme.
iv.	It was informed that one old Dargah and Burial ground exists in the proposed diversion area, the State Govt. is requested to offer its comments in this regard.	M/s.SCCL has informed that this Old Dargah & Burial Ground is existing near Timber Depot under the control of the Forest department. This land is falling in proposed area for diversion Area. The SCCL will provide alternate site for the purpose.
V	The number of trees to be felled is mentioned as 87451 in DFO's report but in part-II of PARIVESH portal it is mentioned as 17701. In this regard, the State Govt. is requested to provide the exact no. of trees to be felled. Further the State Govt. is also requested to forward the said enumeration report of the no. of trees proposed for felling and the method used for enumeration/estimation may be clarified by the State.	The CCF, Bhadradi has informed that the total number of trees in proposed diverted area are 87451, out of these 17701 is the Number of Teak trees. Hence, the exact number of total trees to be felled are 87451. In the Part-II of DFO at s.no (7), the number of trees was also stated as 87451. The method used for enumeration is complete Enumeration method. Copy of enumeration report is enclosed.
vi	The DFO has suggested for creation of Bamboo brakes of 100 mtrs width but the site suitability certificate for taking up plantation of bamboo in such areas are not submitted along with the required costs and source of funds. The same may be submitted to this Ministry	The CCF, Bhadradi has informed that the site is suitable to raise Bamboo brakes in 100 Meter periphery. This forest area is having good natural growth of bamboo in the vicinity. The Site suitability certificate has been furnished by the Forest Divisional Officer, Yellandu and the planting will be done by the SCCL at its cost after getting the Stage-I within 3 years and as and when area is shown by the Forest Department.

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		<p>Some photos of Bamboo plantation taken up on OB nearby is enclosed.</p> <p>An undertaking by SCCL to this effect and Site suitability certificate issued by FDO, Yellandu is enclosed.</p>
vii	<p>The State Govt. has mentioned some areas for diversion as 3rd diversion, some as 1st diversion and some as fresh. To get a clear idea, the State Govt. is requested to kindly mention the breakup along with the validity for each areas.</p>	<p>It is to submit that in Form-A submitted by the SCCL, 1st renewal of Yellandu Mining lease was mentioned due to typographical error. It shall be read as 1st renewal of Yellandu Additional Mining Lease in which 42.50 ha. of forest land was diverted for underground rights.</p> <p>Corrected table enclosed has enclosure.</p> <p>The proposed project Jawahar Khani Open cast Mine (JKOC) is falling in two Mining Leases namely</p> <p>1. Yellandu Mining Lease (YML) (originally granted in the year 1-1-1886 for 99 years. This mining lease was renewed and 3rd renewal was issued by the Govt. of Telangana vide G.O.MS.No.05, Dtd:06-02-2015 for a period of 20 years valid from 01-01-2015 to 31-12-2034) for an extent of 524.96 Ha.(FL- 124.96 Ha + NFL- 400 Ha).</p> <p>1a.In YML, 124.96 Ha Forest land was initially diverted for UG rights for a period of 30 years by the MoEF vide 8-216/FC, dt.07.10.1986 from 01.01.1985 to 31.12.2014.</p> <p>1st renewal was accorded by the MOEF vide Ir.no.8-260/1985-FC, dtd:20-7-2018 for underground mining without any rights over the surface for a period of 20 years from Dt:- 01-01-</p>

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		<p>2015 to 31.12.2034.</p> <p>1.b.In the present proposal(151.8519Ha), 106.304 Ha out of 124.96 Ha., is now included/proposed for conversion from UG to Surface rights leaving the balance area (18.656 Ha) as undisturbed.</p> <p>1.c.While submission of application an extent of 45.5477 Ha is also included as it was treated as forest land Which was earlier thought as NFL. Therefore application was applied for 151.8519 ha (i.e for 106.304 Ha + 45.5477 Ha)</p> <p>2. Yellandu Additional Mining Lease (YAML) for an extent of 1741 ha (FL-71.5Ha + NFL-1669.5Ha) was originally granted in the year 1974 vide G.O.MS.No.1175, dtd:-7-11-1972 for a period of 30 years from 15-04-1974 to 14-04-2004. It was renewed as 1st renewal vide G.O.MS.no.278, dtd:23-10-2007 for a period of 20 years from 15-04-2004 to 14-04-2024) .</p> <p>3. In YAML, 42.50 ha forest land was diverted by the MOEF vide Ir.no.8-8-54/91-FC, dt:25-7-2008 for a period of 20 years for underground rights.</p> <p>KML files of YML, YAML, 124.96 ha. and 42.50 ha. are enclosed .</p>
viii.	The User Agency in their letter dt 25.04.2021 informed that there is one habitation 8-260/1985FC(Vol.I) I/37510/2023 namely Vijayalaxmi Nagar consisting of about 105 families in the Non-Forest Land. In this regard, the State Govt. is requested to offer its comments along with proposed action.	There exists a habitation of 105 families namely Vijayalaxmi Nagar in Non- Forest land, which will be evacuated as per R&R Policy in vogue by the District Revenue Authorities.

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ix.	The State Government is requested to submit the copy of approved Mining Plan and Mine Closure Plan for the mining lease involved in the instant proposal	Mining Plan (Including Mine Closure plan) of Jawaharkhani Opencast was approved by the Ministry of Coal, GOI, vide Lr.No.34011/1/2020-CPAM, dated 29.10.2020. (copy enclosed)
x.	The State Govt. is requested to submit the detailed mining plan of the area 124.96 ha and the plan of State govt. wrt to the balance forest land continued with UG rights i.e. 61.156 ha which is also referred as undisturbed area by State.	These two areas i.e 124.96 Ha and undisturbed area of 61.156 Ha of Forest Land are covered in aforesaid Approved Mining Plan. The area of 61.156 ha FL i.e (18.656 ha + 42.50 ha) was extensively worked in UG method. The reserve of coal is not considered for opencast due to uneconomic stripping ratio. Hence this area has been mentioned as undisturbed. This area is included in the project area so as to go for expansion in case it becomes viable in future.
xi.	The State govt. is requested to submit the status of mining leases cum mining plans of the JK-5 open cast mine existing in NFL area along with the mining plan of the 21 inclined UG mines which they plan to convert in Open Cast. Further, the State Govt. is also requested to clarify the exact area for which FC is being asked in the instant proposal if it has any overlap/connection with the area of 21 inclined mines. The same may be presented by a Map and relevant KML files may be submitted for further analysis in this Ministry	JK 5 OCP is falling in the Yellandu Addl. ML(YAML). No forest land is involved in JK-5 OCP. The 21 incline UG mines is falling in Yellandu ML (YML). Clarification regarding FC area asked in instant proposal & if any overlap/connection with area of 21 incline mines is as follows: The exact area for which FC permission is requested in the instant proposal is 151.8519 Ha. which is in two polygons. a. An extent of 106.304 ha is part of 124.96 Ha. diverted for UG rights earlier, now proposed for surface rights. b. Further an area of 45.5477 ha. is identified as forest land during authentication and included in this instant proposal. The proposed area for diversion is part of 21 Incline mine which is now proposed to work in Opencast

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		method. There is no overlapping with any mine/ project. The Maps of 106.304 Ha. & 45.5477 Ha. are enclosed.
xii.	State Government is requested to forward the EC pertaining to JK5 mine with a clarification regarding conditions laid down in the respective EC wrt the mined out areas or OBD areas and the provision for rehabilitation or greening the same if any. The updated status with respect to the mining closer plan of JK-5 may also be submitted. Further, the details of the area to be used for OBD of the instant proposal in the JK-5 mine may be submitted along with the KML file.	<p>M/s.SCCL has submitted a copy of the EC granted for JK5 OCP by the MOEF & CC vide-J-11015/31/2013-1A-II (M) Dt.03.03.2016 is enclosed.</p> <p>The stipulations in the above EC, related to mined out areas or OBD and provision for rehabilitation or greening have been made under condition number viii, xix,xxi,xxii,xxiii,xxix and xxxii.</p> <p>Reply to these points and the EC compliance report of JK5 OC Mine are enclosed.</p> <p>The KML file of area to be used for OBD of the Instant Proposal in JK-5 OCP is enclosed.</p>
Xiii	The State has submitted that an area of 61.156 ha will be kept undisturbed and continued with UG rights. In this regard, the State govt. is requested to provide the existing mining plan wrt to the referred undisturbed area and is also requested to comment whether there is/will be a separate mining plan for this area.	<p>The area of 61.156 Ha is FL diverted with UG rights and no mining activity is proposed in this area, hence kept as undisturbed. This area is covered in the Approved Mining Plan.</p> <p>There is no mining plan separately to this extent.</p>
Xiv	Complete compliance of the Stage-II approval letter no. F. No. 8-260/1985-Fc dt 20.07.2018 w.r.t. diversion of an area of 124.96 ha of forest land in Kothagudem Division, Khammam District in favour of the M/s SCCL and also compliance report wrt approval letter no. F. No. 8-54/1991-FC(pt) dt 25.07.2008 wrt renewal of an area 42.5 ha of Forest land.	The compliance report of Stage II approval letter of 124.96 ha. & 42.5 ha FL diversions, are enclosed.
xv.	The Lol dt 15.09.2015 issued by Ministry of Coal (uploaded in PARIVESH portal) is in favour of JK-5 opencast Project (March, 2014) for JK-5 OCP Block, Yellandu Coal Belt, Godavari Valley Coal field, District Khammam, Andhra Pradesh in respect of M/s. SCCL under Section 5(2)(b) of the MMDR Act. 1957 by the Central Government.	The SCCL submitted application for approval of Mining Plan for JK5 -OCP Block in Yellandu coal Belt, Khammam district in March-2014. As on that date (March -2014) it was in the State of Andhra Pradesh (before bifurcation of the State of A.P).

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	<p>However, the instant proposal pertains to Govt. of Telangana. The State Government may offer its comments in this regard and also on any requirement of new Lol to be issued.</p>	<p>Later, Telangana State was formed on 02.06.2014.</p> <p>The Ministry of Coal, GoI communicated the approval of Mining Plan and Mine closure Plan of JK5 OCP to SCCL on 15.09.2015 in which Telangana State was mentioned.</p>
xvi	<p>The State Govt. is requested to offer its comments on the issues raised by CF, Kothagudem Circle in its Site Inspection Report.</p>	<ol style="list-style-type: none"> 1. Chain link fencing will be taken up around the proposed CA land to protect it from encroachment & biotic interference by user agency. 2. Boundary pillars will be constructed all along the periphery of proposed CA land. 3. Construction of ramp to deep water bodies for easy wild life movement will be taken up by user agency. 4. Broad casting of forestry seeds & grass seeds - wild life mitigation measures to be borne by user agency. 5. User agency will bear the CA scheme cost for the fulfillment of the mitigation measures. Above works as suggested by Conservator of Forest may be agreed to. <p>A Wildlife Conservation Plan has been already approved by the Chief Wildlife Warden, Telangana, vide Ref.No-11416/2021/WL-1 (i) Dt.12.10.2021 for Rs.3.42 Crores and this amount was deposited vide GM-Yellandu, letter dtd:1-3-23.</p>
xvii	<p>While discussing the similar kind of proposal of conversion of UG mines to open cast mines by the same User Agency the FAC on 21.09.22 deliberated that converting the UG mines to Open cast mines fails the motive of encouraging the UG Mines. The UG Mines are encouraged since the vegetation above the soil is not affected. Considering the large area to be diverted and huge number of trees to be felled, biodiversity impact</p>	<p>This proposed quarry area was already extracted extensively by underground mining methods. There is no scope for further continuing underground mining in this area. The present opencast proposal is only intended for extraction of the residual coal blocked. The extractable reserves in this area</p>

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<p>assessment, valuation of ecological/ecosystem services from the said land to be diverted needs to be accounted for. Therefore, the State Government is requested to rework C:B analysis report considering adverse effect on the ecological parameters due to conversion of underground mines to open cast mines as per the above observation of FAC and submit a revised C:B analysis report. Further, it is highlighted that the submitted CB report with instant proposal is not duly countersigned and verified by the concerned DFO.</p>	<p>is 19.68 MT.</p> <p>The cost benefit analysis of the proposed FL diversion, area was done as per the MoEF&CC guidelines for "for conducting Cost Benefit' Analysis for projects involving diversion of forest Land under the provisions of the Forest (Conservation) Act, 1980" issued' Vide Ltr No.7-69/2011-FC(pt.), dated:01.08.2017.</p> <p>CB ratio arrived is 1:33.72</p> <p>As suggested, CB Analysis is reviewed after incorporating the ecological services as was done in case of VK Coal Mine.</p> <p>Revised CB ratio arrived is 1:23.79. The SCCL is willing to take up mining with this proportion of Cost:Benefits.</p>
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In view of the above, the State govt is requested to forward the additional information to the Gol, MoEF & CC, New Delhi for further consideration of the proposal.

Encl: As above.

Yours faithfully,

Prl. Chief Conservator of Forests
Head of Forest Force(HoFF)

Advance Copy submitted to the Director General of Forests & Special Secretary to the Govt, MoEF& CC, Gol, Indira Paryawarana Bhawan, Jorbagh Road, New Delhi - 110003 for information and necessary action.

Copy to

The Conservator of Forests, Bhadradi Circle and the District Forest Officer, Bhadradi Kothagudem.

Sri Surendra pandey, IFS (Retd.), Advisor (Forestry), The SCCL, Singareni Bhavan, Red Hills, PB.No.18, Khairatabad(Post), Hyderabad - 500004 for information .

The General Manager, M/s Singareni Collieries Corporation Limited, Kothagudem Area, Bhadradi Kothagudem District, PO: Venkatesh Khani - 507103