

OFFICE OF THE PCCF (HOFF), RAJASTHAN, JAIPUR

F 14()/2015/FCA/PCCF/ 1841

Date: 13/4/2018

To

Additional Principle Chief Conservator of Forests
(Central), Government of India, MOEF & CC
Regional Office, Central Zone, Pancham Tal, Central Bhavan, Sector H
Aliganj, Lucknow

Sub :- Diversion of 13.015 ha. of forest land in favor of NRSSXXXVI Transmission Limited, for construction of 400 KV D/C Babai (RRVPL) to Bhiwani (PGCIL) Transmission Line in Jhunjhunu forest Division Rajasthan reg-Proposal No FP/RJ/Trans /28622/2017

Ref : - Your letter no 8B/Raj/04/11/2018/FC/21 Dated 10.04.2018

Dear Sir,

With reference to above mention subject compliance of your EDS dated 10.04.2018 is based on information provided by CCF/DCF/UA as follows.

Sl.No	Compliance raised by Regional MoEF&CC	Compliance Report
1(a)	Hard copy of the proposal is without Index and Page Numbers have been provided by Pencil	As per User Agency, indexing the proposal and Page numbers have been mentioned on all pages.
1(b)	Several documents of the proposal mere Xerox copies without authentication.	All the documents have been signed by the Authorized signatory of the User Agency which mainly includes approval letters of the project.
2	As per A-3 XVII of Part I, signature of Authorized person needs authentication from competent authority for becoming authorized signatory on behalf of User agency.	Mr.Rajnish Mehrotra has been authorized by the company directors to sign documents on behalf of NRSSXXXVI Transmission limited. The Authorization letter already enclosed with proposal. A copy of same on present date is being submitted once again.
3	Information provided at B-2.4, component wise breakup of land requirement provides gross details. Details of forest land proposed for diversion on basis of project component shall be provided.	As per MoEF&CC guidelines, the ROW for 400KV D/C line is 46mtrs. All the activity will be done in the below area. In the Proposed area there are 7 towers which is to be erected. The area wise details for project proponent is as below: Construction of 7 Nos. of structures : 0.4375Ha ROW of Transmission Line : 12.5775Ha Total Area : 13.015Ha
4	As per the Justification uploaded with the proposal at D-I in Part I where involvement of Wildlife reserve or Conservation area is clearly mentioned but the same vital facts are not reflected in Sr.No 8 of Part II specifically designed for Wildlife Significance. The issue needs	As per DCF report, Total 13.015 ha. forest land proposed for diversion. Out of 13.015 hac., 7.452 ha. forest land falls under Bansiyal Khetri Conservation reserve and 5.553 ha. falls in protected forest of Khetri 48 A

	clarification. The Proposal may be segregated in two.	
5	The alternative provided at D-2(a) in Part I is incorrect. A slight change in alignment will avoid portion falling within Khetri PF which will reduce proposed diversion by 5.563Ha. This vital points Justification.	As per User Agency reply, The Proposed route is passing through the Khetri PF and it cannot be avoided as the substation where we need to connect the line is just behind the forest patch. Just after the forest patch there are No options for passing the line as there are villages and mining. We would have to go round the forest patch which would not make the project unfeasible. The forest patch of Khetri PF does not involve much flora and Funna hence not disturbing the environment and ecology.
6	Document from District Level committee for FRA 2006 have not been uploaded at K-1 (a) of part I of the proposal.	The District level community meeting proceeding for FRA 2006 was uploaded by DFO in Part II under additional Information Details Sl.No 5. Original FRA certificate are enclosed.
7	As per GIS DSS analysis of KML files following points regarding proposed forest land for diversion and proposed compensatory afforestation need revision <ul style="list-style-type: none"> a. Original Toposheet from Survey of India need submission b. KML file have not been submitted in CD c. KML file of proposed forest land diversion when overlaid on Google Earth show a shift with Right of Way 	As per reply of User Agency, <ul style="list-style-type: none"> a. All the alignment and CA land details have been superimposed on Original Toposheet downloaded from Survey of India website. b. KML file of single route, forest patch, 3 alternatives and Rinex data of DGPS conducted is already submitted to your good office. We are hereby submitting once again. c. The KML file are as per DGPS report and are in accordance with Ground survey along with forest officials. There may be some variation as there is always some error in google maps and hence cannot be considered benchmark.
8	Additional document uploaded in Part I at Sr No 3 mentions diversion is of Road side PF which is obligatory and unavoidable whereas document at Sr.No D Part I are showing analysis of 3 alternatives. This is contradictory and need Clarification.	As per DCF Jhunjhunu report, There is No strip plantation along roads. The proposed Transmission Line is passing through Khetri 48 A PF and Khetri Bansiyal PF (Conservation Reserve) in Jhunjhunu district.
9	Detail Land Schedule with basis of area calculation of proposed forest diversion has not been uploaded and land schedule provided in hard copy is without details.	The area has been calculated after making a polygon for forest patch coming in 46Mtrs of ROW. At many places the forest area is encountered in corners of ROW and remaining id Non forest. In those cases multiplying length to RoW will not give correct figure.

		The present area considered is as per DGPS survey after preparing the polygon with corner points of the forest area affected. The Land Schedule submitted in Hard copies for the same reason contains area in Hectare.
10 (A)	Online enumeration list shows negative value in column 0-30 cms girth class which is incorrect.	Online correction has been done by DCF. Hard copy is enclosed.
10(B)	Diversion proposal for transmission line needs submission of 2 enumeration list, one for tree effected due to diversion and other trees to be felled.	Total 68 trees falling in the proposed transmission line. Only 44 trees are to be felled. List of trees are enclosed.
11	Compensatory afforestation has been proposed on double degraded forest land which is not as per provision contained in FCA handbook chapter 3. This exemption from equivalent non forest is available to transmission lines upto 220kV (3.2.(vi)c.) or central government undertaking 3.2 xi, which is not the case in this proposal as at A-2(Xiii) of Part I it is mentioned that user agency is Private.	There was a guideline from MoEF&CC F.No.11-68/2014-FC(pt.) dated 11 th July 2014 which has made amendment in FCA handbook para 3.2(vi)c which extended the provision of Degraded forest land for all proposal for laying of transmission Line. Hence for our case also, we have raised the compensatory afforestation over degraded forest land over double the area.
12	Site Inspection report of DCF is without mentioning the legal status of forest land proposed for diversion	Revised Site Inspection report uploaded online.
13	The proposal is without map showing location of transmission towers on forest and Non forest land.	All the towers cannot be marked on toposheets as it is in the scale of 1:50000. But the towers in forest are already marked in the village maps which are attached in additional information details sl.no 9, 28, 29.

Enclosed: As above

Your's sincerely



(A.K. Singh)

APCCF Protection &
Nodal Officer FCA
Rajasthan, Jaipur


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F 14()/2017/FCA/PCCF/

Copy forwarded for:

- 1- Secretary (Forest), Government of Rajasthan, Jaipur.
- 2- Chief Conservator of Forest, Jaipur
- 3- Deputy Conservator of Forest, Jhunjhunu.
- 4- NRSSXXXVI Transmision Limited, New Delhi

Date:


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