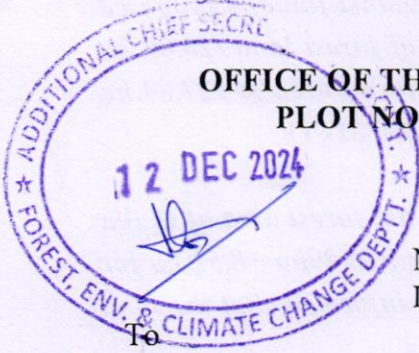




STATE FOREST HEADQUARTERS, ODISHA
OFFICE OF THE PRINCIPAL CHIEF CONSERVATOR OF FORESTS & HoFF
PLOT NO. GD-2/12, ARANYA BHAWAN, CHANDRASEKHARPUR
BHUBANESWAR-751023

E-mail:- nodal.pccfodisha@gmail.com

No. /9F (MG)-49/2023
Dated, Bhubaneswar the December'2024



To
The Assistant Inspector General of Forests (FC Division)
Government of India, Ministry of Environment, Forest & Climate Change
New Delhi.

Sub: Proposal for seeking prior approval of the Central Government under Section 2 of the Van (Sanrakshan Evam Samvardhan) Adhnyam, 1980 for non-forestry use of 134.69 ha of forest land for Expansion of Kulda Open cast Coal Mining Project of Basundhara Area of Mahanadi Coalfields Limited in Sundargarh district of Sundargarh Forest Division.

Ref: (i) Letter No.8-07/2024-FC dated 07.11.2024 of Govt. of India, MoEF & CC (FC Division), New Delhi.

Sir,

In inviting a reference to the aforesaid office letter on the captioned subject, this is to inform that the DFO, Sundargarh Forest Division has submitted the necessary point wise compliance on your observations pointed out under reference which has been recommended by the RCCF, Rourkela Circle are as follows:-

Observation No. (i):- As per the proposal the lease area is mentioned as 921.35 ha however, as per DSS analysis the area of Kulda OCP lease (including additional area) is found 831.885 ha. The state shall examine and submit the correct area details and correct KML file of the lease area is required to be submitted

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that the DFO has intimated that, as per approved Mining Plan and EC, Kulda OCP was being operated within a mining lease area of 634.205 Ha. The current expansion is for an additional lease area of 295.62 Ha making it a total of 929.825 Ha. and as an area of 8.52 Ha of forest land was re-diverted for Basundhara Washery, the total lease area was revised to 921.305 Ha. The layout plan showing the Present area of Kulda and the expansion area is being attached herewith as **Annexure "A"**.

The DFO has appended the KML file which has been prepared and submitted by the user agency to reflect the lease boundary of 921.305 ha. which is attached in **CD Form**.

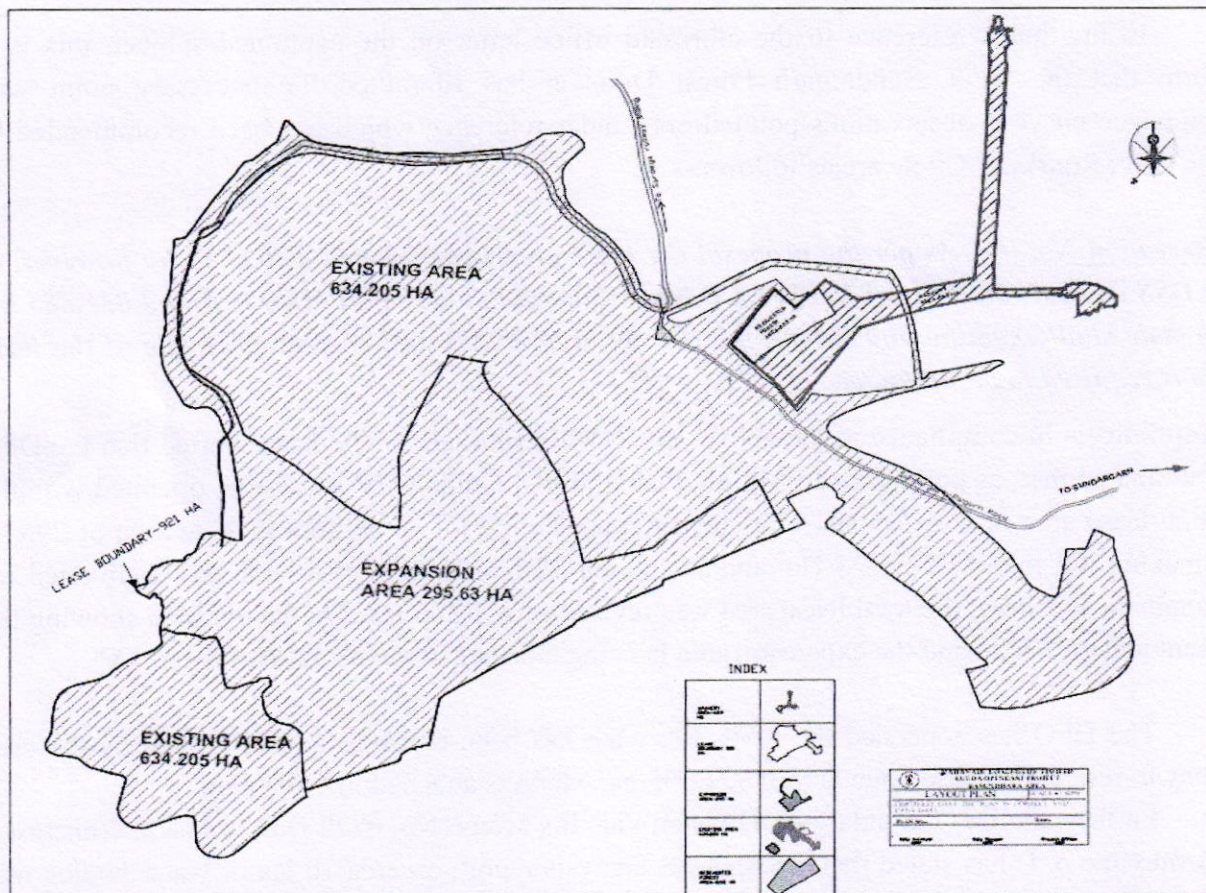
Further, the DFO, Sundargarh Division vide his Memo No. 6722 Dtd 30.11.2024 (enclosed as **Annexure-A-I**) has stated that, as per DSS analysis report, an area 10 Ha of water bodies was not included earlier and it is clarified that an area of 929.825 ha is comprised of 4 Ha as MDF, 678 Ha as Non-Forest, 132 Ha as open forest, 105 Ha as scrub and 10 Ha Water Bodies. The KML file of 921.305 Ha & DSS analysis photocopy are attached in **Annexure-A-II**.

Observation No. (ii):- After the examination of the reply of point (iii) (a) of the Ministry's observation dated 11.06.2024 it has been observed that the Ministry has accorded earlier approval vide letter dated 08.08.2007 for diversion of 227.86 ha. (as against initially proposed 280.86 ha) for Kulda OCP. Later the Ministry has accorded 29.41 ha of forest land (20.89 ha fresh area and 8.52 ha of land for re- diversion out of already diverted forest area of 227.89 ha for Kulda OCP of MCL) for construction of Basundhara Coal Washery (10 MTY)

In this regard as per the record available with the Ministry, the total forest area of Kudla OCP will be $(227.89 - 8.52 = 219.37 + 134.69 \text{ ha for current proposal and } 20.89\text{ha} + 8.52 \text{ ha for washery})$ which comes out to be 383.47. However, the State Govt. has informed that the total forest area is 354.06 ha. This needs clarification.

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported duly submitted by the DFO, Sundargarh that, the User Agency has intimated that, the proposed Basundhara washery is a stand alone project which will be constructed near mine entry of Kulda OCP in the northern side. It is also proposed to install 3 nos. rapid loading systems by constructing Silos for fast evacuation of coal at Barpali Bulb. The washed coal shall be carried by the series of conveyors from the proposed washery to feed into the Silo located approximately 2.0 km from the washery site. The location of silo is proposed on the MGR loop connecting the railway line from Jharsuguda to Sardega near Barapali yard.

A map showing the location of Basundhara Washery with respect to Kulda OCP is as shown below:-



The Washery project with Clean coal corridor and Reject Storage site is planned to be set up in an area of 43.9 Ha, the details of which are as shown in the table below:

Sl. No.	Description of structure	Total land (Ha)	Type of land (Ha)		
			Forest	Govt.	Tenancy
1	Washary	19.32	18.07	0.54	0.71
2	Reject Storage Site	2.71	-	1.53	1.18
3	Reobject conveying corridor	0.85	0.53	0.32	-
4	Clean coal Conv. corridor	21.02	10.81	1.94	8.27
	Total	43.90	29.41	4.33	10.16

Further, the DFO, Sundargarh Forest Division has reported that, out of the 29.41 ha of forest land involved in the washery project, 8.52 Ha has already been diverted for infrastructure of Kulda OCP vide FC no. 8-176/1997-FC dated 8th August, 2007 which has been re-diverted for Basundhara Washery. Rest of the land i.e. 20.89 Ha Forest land and 14.49 Ha Non Forest land does not fall in Kulda Project and it is a separate project.

The User Agency has submitted the layout plan showing Kulda OCP and Basundhara Washery which is attached in **Annexure "A"**.

The User Agency has submitted, the EC for Basundhara Washery vide No. J-11015/435/2013-IA-II (M) dated 31.10.2019 detailing the land usage at section 3 (xii), which is attached in **Annexure "B"**.

Hence, the DFO, Sundargarh Forest Division has reported that the total forest area in Kulda Project will be 354.06 ha only. (Kulda OCP-227.89 ha - Basundhara Washery Re-diversion 8.52ha + Kulda expansion 134.69 ha)

Observation No. (iii):- Further, the details of 20.89 ha has not been provided by the State Govt. The KML file of 20.89 and 8.52 ha and CA area against the said proposal is also required to be submitted.

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that the KML file of 29.41 Ha forest land including 20.89 Fresh forest land and 8.52 Ha re-diversion is being attached herewith in **CD form**. The DGPS plans of 29.41 Ha forest land is enclosed as **Annexure "C"**.

An area of 29.41Ha (Revenue Forest-19.52Ha + Reserve Forest-1.37 Ha = 20.89Ha + 8.52Ha of Revenue Forest) has been accorded Stage-I approval vide order No.8-176/1997-FC (Vol) dt.11.03.2019 of MoEF & CC, GoI. The copy of Stage-I approval order is enclosed as **Annexure-"C-I"**

Observation No. (iv):- Further, a report on the compliance of the conditions stipulated in all the past approvals is required to submit after verification from RO.

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that the DFO, Sundargarh Forest Division has conducted the field verification on 25.07.2024 and submitted his compliance of conditions of MoEF & CC for 227.89Ha of Kulda OCP vide Memo No.3986 dt.26.07.2024, which is enclosed as **Annexure-"D"**.

Further, the report of RO which already contains the compliances of FC obtained for Kulda OCP vide FC No. 8-176/1997-FC dated 8th August, 2007 is enclosed as **Annexure "D-1"**.

Observation No. (v):- After the analysis of the KML file of the proposed forest land it has been observed that habitation, cultivation land, mined out area and road is visible in the proposed revenue forest patches. In this regard the comments of the State Government shall be provided along with action report as applicable

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that, habitation & cultivated land are visible within the proposed revenue forest patches. Further, it is to highlight that several land claims have been settled under the Forest Rights Act, 2006 (FRA) in the villages of Siarmal and Tumlia coming under this expansion project as per FRA Certificate issued by the Collector, Sundargarh with the list of Title holders vide letter No.5418 dt.21.06.2021 which is enclosed as **Annexure-“E”**.

Further, the DFO, Sundargarh has reported that no mining has been done in the expansion area of Kulda OCP. The roads visible within the proposed forest patches have been constructed for internal use related to forest conservation and management activities of Lalma Reserve Forest. These Kachha roads are not intended for public access, commercial use, or any form of development but were created to facilitate the maintenance, protection, and monitoring of the forest. The primary purpose of these roads is to ensure the effective management of the forest ecosystem, such as for activities related to fire control, anti-poaching patrols, and wildlife monitoring.

Observation No. (vi):- KML file of earlier diverted 227.89 ha forest land and safety zone is required to be submitted.

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that, the DFO, Sundargarh Forest Division has intimated that, the forest diversion of 227.89 Ha has been applied in the year 1996 and Stage-I approval has been accorded for 50.72 Ha in the year 2001 and for balance 177.17Ha in the year 2002. Stage-II FC has been accorded in the year 2007. No DGPS Survey was carried out at that time and all the approvals have been done by the government as per plans submitted in hard copies. Further, the User Agency has prepared & submitted the KML of Forest patches & showing Safety Zone, which is enclosed in **CD form**.

Observation No. (vii):- Revenue Forest patch nos. 2264, 2235, 2233, 2217 and 2188 are falling outside the lease boundary and their total area is found 1.671 ha. This needs clarification and corrective action is to be taken accordingly

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported duly submitted by the DFO, Sundargarh Forest Division, that the User Agency has intimated that, the DGPS survey of Tumulia Village had to be reconducted due to difference with the land schedule. Accordingly some of the additional plots which are located near the boundary of Kulda and Garjanbahal were earlier left out of the lease boundary over Revenue Forest patch nos. 2264, 2235, 2233, 2217 and 2188= 5 Plots relating to Kulda Expansion Project of MCL. The revised KML file submitted by the User Agency showing the lease boundary of 295.62Ha is enclosed in **CD form** and map is enclosed as **Annexure-F**.

Observation No. (viii):- As per the analysis on DSS, the area proposed for CA namely Patch 2 (56.5 ha) and Patch 3 (131.545 ha) is having density more than 0.4. Out of 56.5 ha area, 51.0 ha in Patch 2 and out of 131.545 ha, 65.0 ha area in patch 3 (total 116 ha) is found as MDF. Therefore the revised CA area is required to be submitted with all requisite details for plantations.

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that the instant project involves a diversion proposal of 134.69 Ha which needs double the degraded forest land over 270Ha as CA. However, for this project a total of 305.59 Ha degraded reserve forest has been identified for CA. Out of 305.59Ha, an effective area of 286.96 Ha has been considered for CA plantation..

The details of which are as follows:

Sl. No	Details of CA Land	Allotted area(Ha)	Effective area (Ha)	ANR (Plantation/Ha)
1	Pandripani RF	64.10	56.30	600
2	Sidarmunda RF	53.56	53.56	400
3	Punjipahad RF	131.54	121.00	600
4	Panikholia RF	56.39	56.10	400
	Total:-	305.59Ha	286.96Ha	

The DSS Analysis of the allotted CA lands when it was finalised in the year 2022-2023:-

Sl. No	Name of notified land for earlier allotted CA	DSS analysis					Google verification
		MDF	Non-Forest	Open Forest	Water	Scrub	
1	Pandripani RF	0	9	55	0	0	1-House
2	Sidarmunda RF	0	1	52	0	0	
3	Punjipahad RF	0	6	125	0	0	
4	Panikholia RF	0	1	56	0	0	
	Total:-	0	17	288	0	0	

Non-Forest-17Ha + Open Forest-288 ha = 305Ha available & effective area-286.96Ha, as per DSS figure for the year, 2022-2023.

Accordingly, the scheme has been prepared considering the density of the patches @ 400 / 600 ANR Plantation per/Ha which has been assessed jointly by the Forest Official of Gopalpur Range and User Agency and found to be feasible and suitable for taking up CA @600/Ha & @400/Ha at that time. The DSS analysis report is enclosed herewith as **Annexure-G**.

Observation No. (ix):- After the analysis of the KML file of the proposed CA land it has been observed that road is passing through patch No. 3 & 4. Further, encroachment in the form of cultivation land, habitation, man-made water body is visible in patch no.1 and plantation in patch no.3 (during year 2022). In this regard the comments of the State Government shall be provided (DSS report is enclosed for reference).

Compliance:- In compliance to the above, the RCCF, Rourkela Circle has reported that a total of 305.59 Ha has been identified for CA for this project. The road, water body, cultivation land and plantation etc have been taken into consideration and an effective area of 286.96 Ha have been considered for plantation. The road visible in patch 3 & 4 was the road existing since long, which was not taken up for plantation.

The cultivated lands & water body are a part of FRA patta applied at FRC level but not yet finalised. However, these are also excluded from total CA area.

As per DSS current analysis report, an area of 135.88Ha of land is suitable for plantation, out of 286.96Ha of identified CA land. The current DSS analysis report is enclosed herewith as **Annexure-G**.

Further, the DFO, Sundargarh Division vide his Memo No. 6722 Dtd 30.11.2024 (Enclosed as **Annexure- A-1**) has reported that, the CA land patches selected were checked on FSI-DSS portal during 2022-2023 and all the patches were under Open Forest Category(Canopy density <0.4). The DSS analysis report generated during that time is enclosed herewith for kind perusal. So, in order to conform

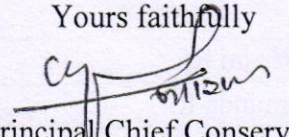
this by ground level truthing, a density study has been carried out by the Range Officer, Gopalpur along with MCL authorities in the site. It shows MDF, as per DSS analysis at 7 Nos of sample plots of 20m x 20m in area Punjipahad RF & 10 nos of sample plots of 20m x 20m in Panikholia RF. The joint field verification report along with photographs are enclosed as **Annexure-H Series**.

Therefore, as stated by the DFO, Sundargarh Division, the density study proves that, the identified Compensatory Afforestation land in Punjipahad RF & Panikholia RF @600 plants/Ha & @400 plants/Ha respectively are suitable for raising CA, for which a financial outlay of Rs.9,02,61,000/- in respect of the Compensatory Afforestation has been approved (Enclosed as **Annexure-I**)

In view of the above, the compliance to the observations pointed out by Government of India, MoEF & CC, FC Division, New Delhi is sent herewith for favour of kind information & further course of action.

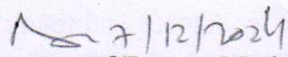
Encl: As above

Yours faithfully


Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)

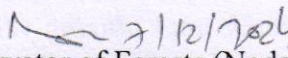
Memo No. **25106** /Dt. **11.12.2024**

Copy alongwith the compliance report of one set forwarded to the Additional Chief Secretary to Government, Forest, Environment and Climate Change Department, Odisha, Kharvel Bhawan, Bhubaneswar for favour of kind information and necessary action with reference to Letter No. 8-07/2024-FC dated 07.11.2024 Govt. of India, MoEF & CC (FC Division), New Delhi.


Chief Conservator of Forests(Nodal)

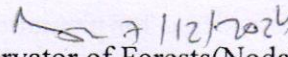
Memo No. /Dt.

Copy forwarded to the Regional Chief Conservator of Forests, Rourkela Circle for information and necessary action with reference to his Memo No. 6110 dated 02.12.2024.


Chief Conservator of Forests (Nodal)

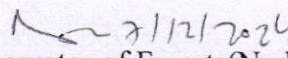
Memo No. /Dt.

Copy forwarded to the Divisional Forest Officer, Sundargarh Forest Division for information and necessary action with reference to Memo No. 6111 dated 02.12.2024 of the RCCF, Rourkela Circle to his address.


Chief Conservator of Forests(Nodal)

Memo No. /Dt.

Copy forwarded to the Chief General Manager, O/o the Project Officer, Kulda OCP, Basundhara Area, MCL, Sundargarh Odisha-750076 for information and necessary action.


Chief Conservator of Forests(Nodal)