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**OFFICE OF THE PRINCIPAL CHIEF CONSERVATOR OF FORESTS (HEAD OF FOREST FORCE), MAHARASHTRA STATE, NAGPUR**

ADDITIONAL PRINCIPAL CHIEF CONSERVATOR OF FORESTS AND NODAL OFFICER, MAHARASHTRA STATE, NAGPUR,

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**Sub:-** Diversion of 243.74 ha. (Shahpur division 181.45 ha. and West Nashik division 62.29 ha.) Forest land for Bhavali Pumped Storage Project (1500 MW) Village Kothale & Kalbhonde in Tal. Shahapur, Dist. Thane & Village Jamunde, Tal. Igatpuri, Dist. Nashik in the State of Maharashtra

No. Desk-17/FCA-S2/PID-153240/Thane/ 1863 /2025-26  
Nagpur – 440 001, Date :- 13/11/2025

To,

The Additional Chief Secretary (Forests),  
Revenue & Forest Department,  
Mantralaya Mumbai -32

Ref:- 1. Online EDS raised by the Government of India, MoEF&CC, New Delhi on 02/09/2025  
2. The Chief Conservator of Forests (T), Thane letter No. Desk-10/FCA/A- 1/501  
20/CR-80/24-25/270, date 07/11/2025.

The Government of India, Ministry of Environment, Forests and Climate Change, New Delhi vide letter under reference No.1 raised certain queries. Accordingly, the Chief Conservator of Forests (T), Thane vide letter under reference no.2 has submitted compliance report for the same as follows:-

<b>Sr. no</b>	<b>Query</b>	<b>Compliance</b>
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.	The DCF, Shahapur & CCF (T), Thane on 04/11/2025 & 07/01/2025 has submitted compliance report as follows:- The user agency has been updated component wise breakup as per letter of State government vide letter dated 05.08.2025 (Annexure-1.1) in online Form A (Part-I) on the portal and copy of part I has been attached. (Annexure-1.2) 1/473
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.	The DCF, Shahapur & CCF (T), Thane on 04/11/2025 & 07/01/2025 has submitted compliance report as follows:- The user agency has been submitted the following details for consideration: Expert Appraisal Committee (River valley and Hydroelectric projects) in its agenda meeting held on 31.08.2024 sought sub-committee to visit the site 1. During the site visit, the Expert Appraisal Committee (EAC), MoEF&CC noted that the proposed muck disposal sites were appropriately selected. The Committee specifically recommended that "the relocation of muck disposal site may not be insisted while considering the proposal for clearance, since the

muck disposal site was found to have been selected properly. Further, ecologically better sites were not appeared available in nearby area. Any relocation at this stage might lead to much changes and may lead to more adverse consequences. However, safety measures as contained in EMP and in other documents should be adhered to in toto.". (Attached as an Annexure-2.1) p/461 to 462

2. The earmarked muck disposal sites fall in areas with very low vegetation density, thereby minimizing adverse impact on forest ecology. (Annexure-2.4) p/452
3. Suitable non-forest land or private land is not available in proximity of the project area, making relocation to non-forest areas practically unfeasible. (Annexure-2.4) p/452
4. An approved comprehensive Muck Management Plan has been prepared and submitted. This includes robust engineering measures (retaining walls, gabion structures, slope stabilization, drainage arrangements) and biological measures (multi-layered plantations, grass slips, native shrubs and tree species, soil enrichment) to ensure environmental protection, slope stability, and long-term ecological restoration of dumping sites. (Attached as an Annexure-2.2). p/461 to 455
5. Further there are ample examples in case of Hydro projects where the complete project components including Muck Dumping sites and facility areas are located within the forest area.
6. (Attached as an Annexure-2.3). p/459
7. In this regard, the User Agency has submitted undertaking and mentioned that the muck disposal sites will be properly stabilized and scientifically reclaimed with vegetation after completion of disposal activities. After commissioning of the project, these sites shall not be used for any non-forestry activity. Therefore, the User Agency has been proposed of such activity in the proposal. This needs to be considered. (Annexure-2.4) p/452
8. The Dy.CF, Shahapur has submitted justification with respect of Working space of 4.8 Ha which is stated as under:
  - The same has to be located in close proximity to the main project working area since there is no private land available nearby Lower reservoir and moving this project facility outside the forest area will exponentially increase men, material & heavy machinery movement causing pollution.
  - The location is carefully planned keeping in view timely completion of the project and maintaining high productivity of all resources.

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		<p>➤ During the EAC subcommittee site visit, the overall project layout including individual project components were reviewed and found to be correctly selected ensuring minimum impact on Environment &amp; forest.</p>
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.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has updated KML file and has been uploaded in Form A (Part-I).</p> <p>The Area of proposal for diversion of Land is 243.737 ha. (Forest) and 31.08 ha. (Non Forest) Total proposed land 274.817 ha., Which Shows properties of diverted land in KML.</p> <p>But an area of 13.814 ha. has not included in the Proposed area, so it did not show the properties of in KML.</p> <p>The said area of 13.814 ha. has been excluded as they do not fall in working areas and the patches lies in between working area. The said area needs to be marked properly for better protection.</p> <p>(Annexure-3) <u>KML file</u></p>
iv	The State Government has recommended 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.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>In this regard, this office has sought remarks from PCCF (WL) on 29/09/2025. Accordingly, the PCCF (WL), Maharashtra State on 13/10/2025 has informed that the said project does not fall within any Wildlife Sanctuary, Tiger Reserve, National Park and Wildlife Corridor. (Annexure-5) p  399, 348</p> <p>Subsequently, the user agency has submitted that Wildlife Conservation Plan approved by PCCF (WL)/CWLW letter No.2269 dated 17.09.2025 with NoC. The copy of the same is enclosed herewith as (Annexure-4) p  451 to 400</p>
5	It has been submitted by the DFO Shahapur and West Nasik that recently the Government of Maharashtra has declared Gut. No. 42 of Village Jamunde, Tehsil- 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?	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>In this regard, this office has sought remarks from PCCF (WL) on 29/09/2025. Accordingly, the PCCF (WL), Maharashtra State on 13/10/2025 has informed that a request has been made to the Government to establish a Management Committee for the Igatpuri Conservation Reserve, but the decision of the Management Committee is yet to be issued from Government level. The copy of the same is enclosed herewith as (Annexure-5) p  399, 348</p>

6	<p>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.</p>	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>In this regard, the Principal Chief Conservator of Forests (Wildlife), Maharashtra State vide letter dated 17/09/2025 has mentioned that the proposed project is 2.21 Km from Kalsubai Harishchandra Gad Wildlife Sanctuary and 12.5 M away from its Eco-Sensitive Zone. The PCCF (Wildlife) has sought Wildlife Conservation and Biodiversity Management Plan. Accordingly, the user Agency has submitted site specific Wildlife Conservation and Biodiversity Management Plan approved from PCCF (Wildlife) Maharashtra State. The copy of the same is enclosed herewith as (Annexure No.5, 6 &amp; 7) (P)399,398, 451 to 400</p>
7	<p>DFO West Nasik 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</p>	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted an undertaking. A copy of the same is enclosed herewith as (Annexure-8) P/384</p>
8	<p>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.</p>	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted approved Wildlife Conservation and Biodiversity Management Plan. The copy of the same is enclosed herewith as (Annexure-6 &amp; 7) P/451 to 400</p>
9	<p>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.</p>	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The copy of the approved Catchment Area Treatment (CAT) Plan is enclosed herewith as (Annexure-9) P/383 to 372</p>
10	<p>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</p>	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>In this regard a detailed study on tunnel construction was conducted by the User Agency from the Central Institute of Mining &amp; Fuel Research (CIMFR), CSIR, Bilaspur to ensure safe</p>

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	regard.	execution of tunnels, and the report is attached as herewith. ( Annexure-10) <i>प/368 to 367</i>																								
11	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.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The detailed tree enumeration data has been attached in Part II of Proposal. 69,100 trees are involved in the project area, out of which 63,881 trees are proposed to be felled (0 to FRL-4). The comparative statement submitted by the Dy.CF, Shahapur is shown as under:-</p> <table border="1"> <thead> <tr> <th>Sr No.</th> <th>Trees enumeration online Data</th> <th>West Nashik Division</th> <th>Shahapur Division</th> <th>Total No. of Trees</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Total trees involved (at FRL)</td> <td>7546</td> <td>61554</td> <td>69100</td> <td>0 to FRL Level</td> </tr> <tr> <td>2</td> <td>Trees involved (at FRL-2)</td> <td>6923</td> <td>59477</td> <td>66400</td> <td>0 to - 2 Level</td> </tr> <tr> <td>3</td> <td>Trees involved (at FRL-4) to be felled</td> <td>6235</td> <td>57646</td> <td>63881</td> <td>0 to - 4 Level</td> </tr> </tbody> </table> <p>The copy of the online Part-II is enclosed herewith as (Annexure-11). <i>प/341 to 342</i></p>	Sr No.	Trees enumeration online Data	West Nashik Division	Shahapur Division	Total No. of Trees	Remark	1	Total trees involved (at FRL)	7546	61554	69100	0 to FRL Level	2	Trees involved (at FRL-2)	6923	59477	66400	0 to - 2 Level	3	Trees involved (at FRL-4) to be felled	6235	57646	63881	0 to - 4 Level
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12	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 Organization (SDSO) and submit the same as applicable.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted that an undertaking which is enclosed ( Annexure-12)</p> <p><i>प/340</i></p>																								
13	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 complete details including KML files, forest and non-forest area involved, trees involved along with the reasons for the rejection of various alternatives.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted that the project is site-specific, with the chosen location minimizing forest land diversion, avoiding critical wildlife habitats, and ensuring optimal engineering feasibility for dam and facility construction. A justification and summary note for site selection is attached with the EDS reply. The necessary documents attached herewith. ( Annexure-13) <i>प/375 to 322</i></p>																								
14	It has been mentioned that project is not located near any river/water body. The state shall give a detailed report as to how the requirement of water and electricity will be met.	<p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted that the electricity requirement of the project will be met by the state Discom, Maharashtra State Electricity Distribution Company Limited (MSEDCL), as per the Power Purchase Agreement (PPA) executed with the Government of Maharashtra. The necessary</p>																								

		documents attached herewith. ( Annexure-14.1) <i>p1301 to 164</i>
15	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.	<p>Initial filling from self catchment of lower reservoir; water use cyclically for energy storage and discharge. The water availability certificate (with one time filling requirement of 17.84 Mcum) dated 21/11/2022 is issued to the proposed lower dam of Bhavali Pumped Storage Project, approval granted by the Water Resources Department, Government of Maharashtra. ( Annexure-14.2) <i>p1320</i></p> <p>The DCF, Shahapur &amp; CCF (T), Thane on 04/11/2025 &amp; 07/01/2025 has submitted compliance report as follows:-</p> <p>The user agency has submitted that the project is being implemented under a Power Purchase Agreement (PPA) with the Government of Maharashtra, under which the State will supply pumping power, and the generated power will be returned to the State. The power evacuation plan is under review and will be approved by the State Government based on ongoing load flow analysis.</p> <p>The transmission line alignment will be designed to primarily utilize non-forest land, involving only minimal forest area if unavoidable. If any additional forest land is required, a separate forest diversion proposal will be submitted following State Government approval. ( Annexure-14.1)</p>

This is for your information and further needful action.  
Encl : As above

*✓ 13/11/2025*

(Naresh Zurmure)  
Addl. Principal Chief Conservator of Forests  
& Nodal Officer

*gkarcet  
12/11/2025  
OA*

Copy to the Chief Conservator of Forests (T), Thane for information.  
Copy to the Chief Conservator of Forests (T), West Nashik for information.  
Copy to the Deputy Conservator of Forests, Shahapur Forest Division, Shahapur for information.  
Copy to the Deputy Conservator of Forests, West Nashik Forest Division for information.  
Copy to the Authorized Signatory, JSW Energy PSP Two Limited at JSW Centre, Bandra Kurla Complex Bandra (East), Mumbai-400051 for information.