

August 24, 2015

To

Chairman and Members,  
Expert Appraisal Committee on River Valley Projects,  
Union Ministry of Environment and Forests,

New Delhi

**Subject: Concerns about TOR clearance for Luhri I (219 MW) HEP**

Respected Chairman and Members,

The agenda for the Aug 24-25, 2015 meeting of EAC includes the proposal “Luhri HEP (219 MW) Project in Shimla District of Himachal Pradesh by M/s. Satluj Jal Vidyut Nigam Ltd – For consideration of TOR.” We as an environment group have been working closely with the local community in the Satluj Valley, especially those to be affected by the proposed Luhri hydropower project. Based on our experience working on the issue, we would like to raise some urgent concerns before the EAC regarding the Luhri hydroproject:

**1. Hydropower cascading of Satluj Basin killing the natural river flow**

It is a well known fact that the natural flow of Satluj river basin has been destroyed due to the hydropower cascading. The only remaining free flowing stretch of the river is now under threat from the proposed Luhri hydropower project. The MoEF and EAC need to take this matter into serious consideration as the Luhri hydroproject endangers the very existence of Satluj river. The last free flowing stretch should be preserved in its current form. The mountains have already been tunnelled and the river diverted substantially for Rampur HEP and Kol Dam- which run in a cascade. No more hydroprojects on this river basin can only guarantee its survival now.

**2. Blatant violation of E Flow regulation**

It is ironic that the alternative project design proposed by the Project Proponents (SJVN) with the aim of reducing environmental, ecological and social impacts openly violates the minimum E Flow regulation set by the EAC-MoEF. The project now before the EAC has the FRL of 862.9 m, same as the minimum tail water level of upstream Rampur project. In lieu of such a design, there would be no free flowing stretch of even 1 km, let alone complying with the 5 km distance as also recommended by the Avay Shukla Committee. To then consider and accept a project with such given parameters is unacceptable. This also puts under scanner the specific impacts the three new proposed dams are going to cause environmentally and socially, and on the riverine ecology in specific.

**3. A Credible Cumulative Impact Assessment for Satluj Basin still pending**

The Satluj River basin has the highest concentration of hydropower projects and it is shocking that yet there isn't any credible Cumulative Impact Assessment of the basin.

inclusive of a carrying capacity study. To then consider a project in absence of a thorough CEIA is unacceptable. The CEIA conducted by ICFRE is yet to be approved as an acceptable report and the quality and the manner in which the study was carried out has evoked significant protests on ground. It now becomes even more urgent for the revised CEIA to incorporate the new plan. (three new dams) Considering any new project in the basin will be a violation of the basic norms, including the MoEF order of May 28, 2013. Here, it is important to cite the recent 24th April 2015 decision of the EAC in case of 460 MW Nakthan project. The EAC desired to know the status of the Beas river basin study and sought a clarification if the project can be considered in absence of this study. The EAC should take the same stance for Satluj basin hydroprojects as well.

#### **4. To not overlook the recommendations of the Panel of Environmental and Social Experts**

The recommendations and observations of October 2014 report of the Panel of Environment and Social Experts (PESE) for Satluj River Basin is another timely reminder and need to be seriously pursued. The report has explicitly captured local resentment against hydropower development in Satluj valley and highlighted the farcical nature of CEIA study and consultation meetings for the same. The report has openly attributed this as a failure of the establishment to address the long pending and fresh concerns that have emerged in the valley. Ironically, the PESE study was carried out under the Directorate of Energy. Even a study commissioned the by government could not take a biased stand on hydropower development in Himachal Pradesh.

**In conclusion:** Under the circumstances, EAC and MoEF should take these issues into consideration before granting TOR clearance to the project and not accord the TOR clearance. The Cumulative impacts have to be taken into account and we continue to demand that this stretch of the Satluj be left free-flowing. After the Uttarakhand disaster of June 2013 and the recent Nepal earthquake there today is a greater urgency to review all large scale construction projects taken up without proper environmental impact assessment or cumulative impact assessment.

Sincerely

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