



Him Dhara, Environment Research and Action Collective
Himachal Pradesh

Website: www.himdhara.org
Email: info@himdhara.org

To
The Chairperson
Expert Appraisal Committee on River Valley Projects,
Union Ministry of Environment, Forests & Climate Change,
New Delhi

25th August, 2018

Subject: Regarding Environment Clearance consideration for 219 MW Luhri Stage I Hydro Electricity Project for EAC meeting on 28th August, 2018

Dear Madam/Sir,

This is a submission vis-a-vis the environment clearance consideration for **219 MW Luhri Stage I Hydro Electricity Project** (HEP, hereafter) in Himachal Pradesh.

Earlier, in our memorandum dated 25th August 2015, we had raised objections related to the granting of the Terms of Reference for the Luhri Stage I (**Annexure 1**, containing objections) without taking into account the Cumulative Environment Impact Assessment (CEIA, hereafter) report prepared by Indian Council for Forestry Research and Education (ICFRE, hereafter) for the Satluj River Basin which was prepared in the year 2014-15. Public Consultations for the same were held between 2013 and 2015. The government of Himachal Pradesh had appointed an independent Panel of Environmental and Social Experts (PESE, hereafter), who also made their observations on the CEIA. (**Annexure 2**, PESE report). We urge you to peruse these documents (text highlighted) as they have implications on the decisions being made vis-a-vis the Luhri Stage I project.

As you understand, the Luhri Stage I is proposed on the free-flowing stretch of Satluj river, i.e. between downstream of the Rampur project (420MW) and upstream of the Kol Dam (800 MW). This 50 kms stretch of the river is proposed to be dammed by the Luhri Stage I and the proposed Luhri stage II (163MW) and Sunni (355MW) projects. The three projects, to be built one after the other, are being proposed by Satluj Jal Vidyut Nigam Limited in lieu of the earlier planned Luhri HEP (earlier 750 MWs and resized to 601 MW) that was scrapped due to the concerns raised about the size of the project and its environmental impacts.

We would also like to point out that the earlier Luhri project had a total land requirement of **368.67 hectares** out of which **181.54 hectares** was forest land. The current projects (all three) if assessed cumulatively, which they must be in order to understand their impacts, will require twice the size of land, i.e. **654.02 hectares, of which forest land comprises of 470.05 hectares**, of what was required for the earlier project.

Table of land required for three projects

S. No.	Project	Capacity (MW)	Total Land (Ha)	Forest Land (Ha)
1	Luhri Stage I	219	149.08	50.98
2	Luhri Stage II	163	185.85	156.55
3	Sunni	355	319.09	262.52
Total		737	654.02	470.05

(Source: EAC minutes of meetings and project documents)

The distance between the 3 projects, the implications of the same on environmental-flow, and the resultant impacts on aquatic-life were concerns highlighted even in the CEIA report and hence, should be cumulatively studied and not project-wise.

In order to understand the nature of the cumulative impacts of these projects on the local ecosystems and

community, the environmental groups and local community representatives in their submission made to Ministry of Environment, Forest & Climate Change (MoEF&CC, hereafter) on several occasions have repeatedly asked for the CEIA to be conducted.

The EAC in its meeting dated 27th March, 2018 had also granted scoping clearance for the Luhri Stage II project without mentioning its linkage with Stage I or any reference to the CEIA study.

The CEIA for Satluj basin was carried out around 2014, and at that time these 3 projects were not planned and proposed. Hence, these need to be assessed thoroughly and cumulatively (along with all other projects in the river basin). The CEIA should have a bearing on the decision to be taken in the Luhri I, II and Sunni HEP, else the exercise itself will be rendered meaningless given that, in the middle zone of the Satluj river basin this is the last and the only stretch of the free flowing Satluj river.

We would also raise a question about why there has been no further process vis-a-vis finalisation of the CEIA for the Satluj River Basin where the largest number of dams (to the tune of more than 13,000 MW) of Himachal are planned and proposed. This is a matter of grave concern given that a long drawn out process was carried out for the preparation of the report and no concrete steps were taken to finalise it.

To access a final copy of the CEIA Satluj River basin, an RTI application (IPO number 31F 708988) was filed on 27/09/2016 to the Directorate of Energy, Himachal Pradesh by a member of our group (**Annexure 3**, RTI). The DoE, however, forwarded the application to the MoEF&CC on 03/10/2016 with the explanation that the matter of CEIAs was now being handled by the MoEF&CC (IA-1 Division) (**Annexure 4**, DoE response and first appeal).

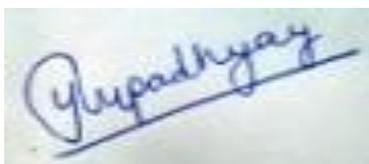
Despite filing of the appeal to the Central Information Commission there was no response from the MoEF&CC. The matter is now pending in the Central Information Commission (**Annexure 5**, e-mail from CIC).

In case there has been any further discussion on the matter, the same could be pointed out to us vide a response from the MoEF&CC.

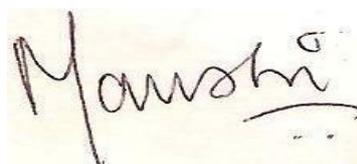
We would like to understand that in the absence of a decision on the CEIA of the Satluj river basin, on what basis are the assessments for individual projects on Satluj basin being made. The EAC, after having arrived at the decisions to cumulatively assess projects at a river basin level, is once again looking at projects in a singular fashion and that is highly objectionable.

We thus appeal to the EAC that:

- The CEIA of Satluj river basin should be brought into discussion at the EAC level.
- The EAC must, after perusal of the CEIA, consider any further projects for scoping and environment clearances. Till then, all projects on the Satluj river basin must be put on hold.



Yogesh Upadhyay



Manshi Asher

Himdhara Collective, Environment Research and Action Collective