

July 12, 2010

To
Chairman and Members of the Expert Appraisal Committee,
River Valley and Hydropower projects,
Union Ministry of Environment and Forests,
New Delhi

Subject: TOR for the EIA of Gulf of Khambhat Development Project

Respected chairman and members of EAC,

We learn from the MEF website that the approval of the Terms of Reference of the Environment Impact Assessment for the Gulf of Khambhat Development Project, also known as the Kalpasar project is on the agenda for the EAC meeting to be held on July 17, 2010. Having perused this project for many years and also having gone through the application sent by the Government of Gujarat for this approval, we feel that to approve TOR for EIA for the proposed Kalpasar project would be inappropriate and gross misuse of the process to push an unprecedentedly huge, unviable project whose basic feasibility is yet to established and the contours of the impacts of the project are still unknown.

1. The project is for building by far the longest dams in India and second longest in the world¹. It expects to create a reservoir of 2000 sq km, more than two times larger than the current largest area reservoir of India, it hopes to have storage capacity of 10 Billion cubic meters, close to the capacity of the largest reservoir of India, it hopes to have 660 km long canal (to be the longest main canal in India), with all the 15000 cusecs of water flow in the canal to be pumped into it over a height of at least 65 meters and so on. Nothing of this nature of project has ever been undertaken in India, this is an unprecedentedly humungous project.

2. However, the basic feasibility of the project remains to be established. Normally work on EIA of the project is started only after basic feasibility of the project is completely, credibly established, but in this case, even going by the application of the project proponent, basic feasibility of the project is yet to be established. For example, on page 10, para 1.8, it says, "GOG (Govt of Gujarat) has considered on dated (*sic*) 22.09.2009 the EAG (Expert Advisory Group) recommendations to carry out further feasibility investigations & study..." So the state government only a few months ago taken decision to take up further feasibility and studies that by its very nature would take many years to complete.

3. More importantly, there are very serious questions about water availability for the project. The project assumes 10 BCM of annual water availability, mostly from Narmada River, at 50% dependability. However, the Narmada river water has already been over allocated by the Narmada Water Disputes Tribunal Award of 1979, when it assumed that Narmada has 28 Million Acre Feet of water and based on which it allocated 9 MAF to Gujarat. However, the longer term flow data now available shows that Narmada has no more than 22.5 MAF, which means Gujarat's share will proportionately² go down. To top it, Gujarat has already over allocated its water share of 9 MAF, to be spread over 18 lakh ha of irrigated area³ and with new demands on its water for the municipal and industrial uses south of Sabarmati, which were not there in the original SSP plans, and with water getting pumped to areas outside command and the initial command areas taking up cropping pattern than uses hugely higher water than it is feasible or planned. With all this, there is no possibility of any water really coming down to Bhadbhut on Naramada river where the project hopes to build a huge Dam (incidentally, for this huge

¹ The largest one seems to be 32 km long, only slightly smaller than the 30 km long dam proposed for the Kalpasar project)

² Gujarat being the downstream state and since the upstream Madhya Pradesh is developing projects at much faster pace than what was assumed by SSP (Sardar Sarovar Project in Gujarat through which Gujarat hopes to use its share of water provided by NWDT), its loss proportion could actually be higher.

³ Looking at the map of the command area of the proposed project given on page 11, we can see that a significant part of the command area of the proposed project is already in the SSP command area, but the project proponents do not seem to be bothered about such details.

venture, mistakenly called a barrage, absolutely no information is provided in the proposal) to divert water through a 32 km long canal to the proposed freshwater reservoir in the Gulf. There is no information about this canal either in the project application. Without the proposed Dam on the Narmada and the canal from there to the proposed reservoir, the proposed reservoir would be useless as it will get no fresh water. So the application is lacking in basic details. More importantly, there is likely to be no water available in Narmada for the Kalpsar proposal with upstream Madhya Pradesh taking up large number of projects and thus the hydrologic viability of the proposal is seriously doubtful.

4. The project proposal sent for TOR approval itself suffers from serious inconsistencies besides being incomplete, as highlighted above. For example, in section I (Basic Information) Item 21(c), about applicability of the CRZ notification, the proposal says NO!! For a project that is going to destroy, change and seriously affect coastal zone all along over 800 kms of coast, the project says CRZ notification does not apply. In Section II, item 1.26 on long term dismantling or decommissioning or restoration work, the answer is again NO, as if the proposed dam will not need decommissioning at some future date. In item 8.3, in answer to “Could the project be affected by the natural disaster causing environmental damage (e.g. floods, earthquakes, landslides, cloudburst etc)?”, the application says No, when natural disasters like Tsunami, Cyclones, earthquakes among others could affect the project. These are only a sample of inconsistencies and not full list, full list would be much longer. It is clear from these that the project should not get clearance at this stage, the proponents have not even applied their mind to the implications of the proposal.

5. There are many other serious issues affecting the project, including huge evaporation losses (a 200 000 ha reservoir with average depth of 5 m in a very hot climate, getting hotter by the day), pollution concentration (all the rivers of the area are known to bring huge amount of untreated industrial and urban sewage toxics, accentuated by the upstream dams), inherent salinity of the soils and geology of the 200 000 ha of proposed reservoir land and questions as to how it will go away in four years, impact on various livelihoods including salt workers, estuarine fisherfolk, among others, issue of increasing sea level rise due to climate change, issue of drainage congestion that the project will create all along the reservoir rim and also Saurashtra coast, impact of the project on climate change (the huge, shallow reservoir with the rivers bringing organic matter leading to methane emission), among others. While the EIA TOR lists some of these issues, most of these issues raise question about the very viability of the project and hence need to be resolved before the project TOR comes for approval before MEF.

The whole idea of this application seems to get some sort of official sanction for a half baked proposal of far reaching implications. To consider approval of even TOR of the EIA of this half baked proposal would be a complete misuse of the process to get currency for an unviable idea and it would only mean completely avoidable wastage of public resources and violation of the EIA notification and Environment Protection Act. We would request the EAC to reject the proposal and ask the proponents to come back only when complete feasibility is ascertained in a credible & transparent way, feasibility report is ready and the proponents are ready to share a copy of such a complete report.

We would be happy to meet the EAC and present our case if necessary. We would EAC to kindly apply its mind even after getting the responses of the project proponent as to what extent the reply satisfactorily addresses the issues we have raised and we hope EAC meeting minutes reflects such application of mind.

Thanking you,

Yours Sincerely,

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