

## Huge Impacts, but no assessment? Groups urge MoEF to correct its blunder on Yettinahole

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**Yettinahole Diversion Project** is being planned in the Western Ghats and Eastern Plains of Karnataka, by the Karnataka Neeravari Nigam Limited (KNNL) purportedly as a drinking water supply scheme to supply 24 TMC water to Kolar and Chikkaballapur Districts. The scheme involves 8 dams in Western Ghat forests, 250 kms long canals, 80 and 50 kms long raising mains, a reservoir that will submerge 1200 hectares of land and 2 villages. A closer look at the Project Report of the scheme indicates that of the 24 TMC to be diverted, assured drinking water to Kolar and Chikkaballapur is just 2.81 TMC! Rest is planned to be allocated for uses like river and tank rejuvenation, irrigation, industries, urban supply etc.



Gundia River, formed of headwaters of Yettinahole, Kerihole, Hongadhalla and Kadumanehole which will be diverted for the Yettinahole Diversion Project Photo: SANDRP

The Project has escaped appraisal by the Expert Appraisal Committee of the MoEF, claiming that it is a drinking water scheme ( as per the EIA Notification 2006, Drinking Water Supply Schemes are exempt from Appraisal and Environmental Clearance process.)

But analysis of the Project report indicates a different picture.

**More than 14 individuals, mainly from Karnataka have written to the Union Environment Minister, Secretary, MoEF and Director, Impact Assessment, River Valley Projects Division to appraise the Yettinahole Diversion Scheme entirely. Signatories include Dr. Ullas Karanth, former non-official member of the Forest Advisory Committee, MoEF, Praveen Bhargava from Wildlife First, Dr. T.V. Ramchandra from Indian Institute of Sciences, noted rainwater harvesting expert Vishwanath Srikataiah, Niren Jain of Kudremukh Wildlife Foundation, amongst others. While the signatories support long term and sustainable solutions to legitimate drinking water demands of drought affected regions in Karnataka, as the letter clarifies, Yettinahole Diversion Project does not seem to be an answer to that.**

To,

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Director (IA) River Valley Projects,  
Union Ministry of Environment and Forests, New Delhi, [bbbdx.dy@gmail.com](mailto:bbbdx.dy@gmail.com)

**Subject: Appeal for fresh Appraisal of the Yettinahole Diversion Project in Karnataka and withdrawal of the Letter/NOC which has been issued by the MoEF on the basis on inaccurate/insufficient information.**

**Respected Madame and Sirs,**

In the 63<sup>rd</sup> meeting of the EAC for River Valley and Hydropower projects, the committee considered Yettinahole Diversion Project by Karnataka Neeravari Nigam Limited, Government of Karnataka (Agenda Item: 2.11 (b) “Clarification on Drinking Water Supply Scheme to Tumkur, Bangalore (Rural), Kolar & Chikaballapur Districts by M/s. Karnataka Neeravari Nigam Ltd, Government of Karnataka for applicability of EIA Notification, 2006.)

The EAC concluded (emphasis added): “In view of the above, the **EAC expressed its inability to consider the project for the purpose of TOR/EIA/EMP etc as this does not fall within the preview and mandate of the EAC** although, there appear to be some environmental and R&R issues involved which may be appropriately addressed. Outcome of the WGEEP report may also have to be factored. The drinking water schemes, in fact, do not attract the provisions of EIA Notification, 2006 and its subsequent amendment, 2009... **The project neither proposes any hydro-electric power generation component nor comprises of any irrigation component and thus has no command area.**”

The EAC also recommended: “The Ministry of Environment & Forests may write to Karnataka Neeravari Nigam Ltd (KNNL), Government of Karnataka that the instant project does not attract the provisions of EIA Notification, 2006 and its subsequent amendment, 2009.” We understand the MoEF sent a letter to KNNL on these lines.

**This recommendation of the EAC and MoEF decision are both incorrect.** Looking at the facts mentioned below, the scheme is Category A project and needs to be appraised by the EAC

not only because it falls under the purview of the EIA Notification 2006, but also due to serious ecological and social impacts. This letter is based on a site visit to the region, discussions with local communities, perusal of the Project Report of the scheme as well as the minutes of 63<sup>rd</sup> EAC Meeting.

EAC considered the project only on the basis of the proponent's statements, without studying the Project Report.

An analysis of the Project Report (Version June 2012, prior to EAC Meeting) it is clear that:

**1. Irrigation Component:** The project aims to supply water to 337 minor irrigation tanks and Zilla Parishad Tanks in Kolar and Chikkaballapur. The command areas of these 337 minor irrigation tanks, as mentioned in the Project Report (Volume I, Annex 3) come to **29,182 hectares. This is higher than command area of 10,000 hectares; hence this is a Category A project which comes under the purview of EIA Notification 2006 and will have to be considered for Environmental Clearance by Expert Appraisal Committee of the MoEF.**

**2. Hydropower Generation:** The Project Report claims that it can generate **125-150 MW** of power through gravity canals. Location details are also made available in the Project report (Page 59, Volume I). **As this is higher than 25 MW, the project comes under the purview of EIA Notification 2006 and will have to be considered for Environmental Clearance by the Expert Appraisal Committee of the MoEF.**

**Thus, the Project comes under the purview of EIA Notification 2006 and should be considered by the EAC, urgently taking back any letter sent to Karnataka Government to the effect that the project does not require an EC as per EIA notification 2006.**

In addition to technicalities about qualifying under the EIA Notification 2006, the project has severe socio ecological impact, which cannot be sidelined by the EAC and the MoEF.

1. Majority of the project falls in Ecologically Sensitive Zone I as per the WGEEP, where any large infrastructure project is banned. In addition, WGEEP bans any inter-basin transfer of water. MoEF has as yet not decided on WGEEP recommendations. In the absence of this, the MoEF cannot provide any letter to the state about not requiring an Environmental Clearance. MoEF will need to consider the WGEEP Report while making its recommendations, as also directed by NGT, which MoEF has not done.
2. The project plans to divert 24.01 TMC water from 4 streams in Western Ghats, without making any study of eflows for the downstream Eco Sensitive Zone.
3. The project does not divulge forest land required. Only by estimating heads under 'cutting thick forests' in its estimates, it will require **107.27 hectares land with thick forest** cover only for laying raising mains. The Hon'ble Supreme Court has formulated Guidelines in the Lafarge Judgment which mandate that projects that require both forest and environment clearance must first secure forest clearance. This has not been complied with.
4. Gravity Canal from Harvanahalli (Sakaleshpur) to Tumkur will require a minimum of **400 hectares land**

5. Reservoir at Devarnyadurga will **require 1200 hectares of land, including 50% forest land and will submerge at least 2 villages.**

Though the project claims to be a scheme for drinking water of Kolar and Chikkaballapur Districts, actual dedicated drinking water allocation of these districts is only 2.81 TMC of the 24.01 TMC diverted which works out to less than 10%. Rest will go for irrigation, river rejuvenation, urban areas, industrial areas, etc. Signatories support long term and sustainable solutions to drinking water crisis. While provision of drinking water to the said districts is a legitimate necessity that we do not object to, what we are questioning is the justification of this ill-conceived project whose cost-benefit analysis is extremely skewed and the ecological and social impacts are horrendous.

Alternative and feasible proposals that will provide the 2.81 TMC feet of water for the said districts have, in our considered view, not been explored. Furthermore, the feasibility of large-scale land acquisition required for the project must be considered in the context of the amendments to the Land Acquisition Bill that has just been passed by Parliament.

Considering all these serious issues, the EAC's appraisal of this project has been incorrect technically as well as wrong on facts and law.

**We urgently request the MoEF to:**

1. Withdraw any letter/NOC etc., that it may have sent to Karnataka Government in this regard as the current decision of the EAC and MoEF may not stand the test of legal scrutiny and may lead to some wholly un-necessary litigation.
2. Direct the State of Karnataka to present a detailed project report that includes the plans for phase II and III that are sure to follow.
3. Ensure that the EAC considers the DPR and appraises project for Environmental Clearance in its entirety.

Looking forward to your response and appropriate action to points raised above. **Thanking you,**

**Yours Sincerely,**

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([kudremukh.wildlife@gmail.com](mailto:kudremukh.wildlife@gmail.com))

**Dr. Ullas Karanth**, Director, Centre for Wildlife Studies, Bangalore

**Praveen Bhargav**, Trustee, Wildlife First, Bangalore

**Kishore Kumar Hongadhalla**, Malanada Janapara Horata Samiti, Sakaleshpura, Karnataka

**Panduranga Hegde**, Parisara Sanmrakshana Kendra, Appiko Movement, Sirisi, Karnataka

**Dr. T.V. Ramachandra**, Energy and Wetlands Group, Centre for Ecological Sciences, Indian  
Institute of Science, Bangalore, Karnataka

**Vishwanath Srikantaiah**, Water and Rainwater Harvesting Expert, Bangalore, Karnataka)

**Dr. Jagdish Krishnaswamy**, Eco-hydrologist, Bangalore, Karnataka

**Dr. Shrinivas Badiger**, Water and Irrigation Expert, Bangalore, Karnataka

**Dr. Bhaskar Acharya**, Bangalore, Karnataka

**Dr. Sharad Lele**, Atree, Bangalore, Karnataka  
**Nachiket Kelkar**, Wildlife researcher, Bangalore, Karnataka  
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