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To

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Dear Technical Director, FCCID & Joint Director, Impact Assessment Division,

Sub: 1) REJECT EC RECOMMENATION OF TSEAC/TSEIAA DT 23.09.2020 Built up area changed from 66479.92 Sq.m. to 70315.19 Sq.m.

2) CANCEL EC DATED 01.09.2020 FOR PROPOSED SECRETERIAT COMPLEX OF TELANGANA STATE GOVERNMENT -

-- BOTH PROPOSALS AIM AT OBTAINING EC BY MISPRESENTATION AS CATEGORY B INSTEAD OF CATEGORY A - HIDING VITAL FACTS THUS AIMED AT CAUSING DAMAGE TO HEALTH AND ENVIRONMENT OF HYDERABAD

Ref: 1) EC Order No. SEIAA/TS/OL/HYD-47/2020-297 dated 01.09.2020 for proposal no. SIA/TG/MIS/169948/2020 received on 28.08.2020,

2) Proposal No. : SIA/TG/MIS/174043/2020 dated 19.09.2020 accepted for EC by Telangana EAC on 19.09.2020 and forwarded to TSEIAA for EC on 23.09.2020

We urge you to consider our submissions and cancel the 1) EC Order No. SEIAA/TS/OL/HYD-47/2020-297 dated 01.09.2020 for proposal no. SIA/TG/MIS/169948/2020 received on 28.08.2020; and, 2) reject the recommendation for EC in modified extension Proposal No. :

SIA/TG/MIS/174043/2020 dated 19.09.2020 accepted for EC by Telangana EAC on 19.09.2020 and forwarded to TSEIAA for EC on 23.09.2020

Objection 1: CATEGORY 'A' PROJECT THAT REQUIRES MoEF CLEARANCE AND PUBLIC HEARING BEING PASSED OF AS CATEGORY 'B' - FALSE REPRESENTATIONS BY GOVERNMENT OF TELANGANA

Note under head 8 titled 'Building /Construction projects/Area Development projects and Townships' under LIST OF PROJECTS OR ACTIVITIES REQUIRING PRIOR ENVIRONMENTAL CLEARANCE of EIA notification dated 14.09.2006 states as follows:

Note:-

General Condition (GC):

Any project or activity specified in Category 'B' will be treated as Category A, if located in whole or in part within 10 km from the boundary of: (i) Protected Areas notified under the Wild Life (Protection) Act, 1972, (ii) Critically Polluted areas as notified by the Central Pollution Control Board from time to time, (iii) Notified Eco-sensitive areas, (iv) inter-State boundaries and international boundaries.

a) As per CPCB report of 2018, Moosi Nadi that is declared as priority I polluted river stretch is around 5kms away, much within the 10kms stipulation of the notification. (document attached)

<https://cpcb.nic.in/wqm/PollutedStretches-2018.pdf>

b) and the project location is within a 5kms range eco-sensitive zone notified under wetlands inventory (document attached)

http://moef.gov.in/wp-content/uploads/2019/09/NWIA_Andhra_Pradesh_Atlas.pdf

Further we reproduce below the content from EIA 2006 the projects that entail public consultation and categorized as A:

'II. Stage (3) - Public Consultation:

(i) "Public Consultation" refers to the process by which the concerns of local affected persons and others who have plausible stake in the environmental impacts of the project or activity are ascertained with a view to taking into account all the material concerns in the project or activity design as appropriate. All Category 'A' and Category B1 projects or activities shall undertake Public Consultation, except the following:-

(ii)

(a) modernization of irrigation projects (item 1(c) (ii) of the Schedule).

(b) all projects or activities located within industrial estates or parks (item 7(c) of the Schedule) approved by the concerned authorities, and which are not disallowed in such approvals.

(c) expansion of Roads and Highways (item 7 (f) of the Schedule) which do not involve any further acquisition of land.

(d) all Building /Construction projects/Area Development projects and Townships (item 8).

(e) all Category 'B2' projects and activities.

(f) all projects or activities concerning national defence and security or involving other strategic considerations as determined by the Central Government.'

Prior to Built up area changed from 66479.92 Sq.m. to 70315.19 Sq.m. itself the EC is not granted in good faith as the 'General Condition' of categorization has been blatantly ignored not just by the project proponent, but also by the Accredited consultant who prepared the EMP and also by the TSEIAA and TSEAC who are charged with the sacred duty of to protect the environment that ensures right to life with dignity for every individual.

Thus, the project falls under category A and all stages of scoping, public consultation and as laid down in EIA notification have to be complied with, that have been shockingly overlooked by the TSEIAA and TSEAC.

Objection 2: BLATANT CONTEMPT OF SUPREME COURT ORDERS NOT TO CONSTRUCTIONS IN ON OR AROUND THE LAKE:

Stop Contempt of Supreme Court Order SLP 5595-96 of 2004 DATED 25.04.2005 and High Court Case 25073/2003 dt 25 april 2005 'no further constructions shall be carried out except with leave obtained from this Court, in, on or around the lake'.

We submit below and reproduce excerpts of the Supreme Court Orders below and attach the same for your ready reference.

i) Submission 1:

On 25 april 2005 Surpeme court in SLP 5595-96 of 2004 ordered(attached):

'2- By way of an interim order an pending disposal of appeal, no further construction shall be carried out except with leave obtained from this Court in, on or around the lake'

ii) Submission 2:

On 16 january 2014 Supreme court in civil appeals 2905-2906 pf 2005 ordered: (attached)

'The interim order of Aprl 25, 2005 shall remain in operation till the matter is finally disposed of by the High Court'

iii) Submission 3:

Further, Andhra High Court in its judgement on 15 June, 2001 had ordered as follows:(attached)

'29. We, therefore, are of the opinion that no further permanent structures including those involving commercial activities may be allowed to be raised on or near the water spread or catchment area.'

iv)Submission 4:

We also attach the Supreme Court appointed 3-member Committee Report that was returned to the High Court in 25073/2003 on 16 January 2014 for further hearing and early closing of case:

v) Submission 5:

Whereas there is an ongoing stay in, on and around Hussain Sagar government of Telangana has undertaken massive constructions/demolitions in, on and around Hussain Sagar.

Objection 3: HEAVY POLLUTION OF MORE THAN 5000 VEHICLES FROM THE PROPOSED SECRETARIAT COMPLEX ILLOGICAL WITHOUT APPLICATION OF MIND:

As per the project plan the more than 30,000sqmtrs area is meant for parking for more than 2000 four wheelers and more than 3000 two wheelers . The vehicular traffic pollution cannot be sustained by Hussain sagar or any water body. Any government that cares for lakes would not have the location of secretariat in such a eco sensitive zone.

Hussain Sagar with its catchment area of around 287 sq kms is a major contributor of pollution to Moosi nadi that is a tributary to Krishna river. Instead of focusing to restore Hussain sagar and Moosi nadi, government of Telangana is creating and establishing a permanent source of pollution in Hussain sagar by way of 71,000sqmtrs of built up area right inside eco-sensitive Hussain Sagar . This same is against lake conservation and lake health. Such continuous and connected pollution and concretization is right at the Hussain Sagar which is a death knell for the lake. And this corroborates with the land manufacturing being done by government of telangana by creating islands inside the FTL of lake for which no document is available in public domain nor has any Joint Committee obtained the same. Two joint committees have given reports one that submitted on 17 August 2020 in NGT OA 85 of 2015 and second committee that recently visited in September 2020 in NGT OA 107/2020.

Objection 4: UNSEEN and UNSANCTIONED DISPOSAL OF CONSTRUCTION DEBRIS OF DEMOLISHED SECRETARIAT

As informed by the government itself more than 3000 trucks would be involved and further that more than 80% of debris cleared. As gathered from news reports who have taken from experts more than 2.2 lac metric ton of debris generated from the demolition of around 11lac cubic ft of construction.

Not a single journalist or citizen has documental information or pictorial information regarding the site where the debris has been disposed. Nor has the government of telangana placed any information regarding the project of demolition of secretariat premises, that includes where and how the vast volumes

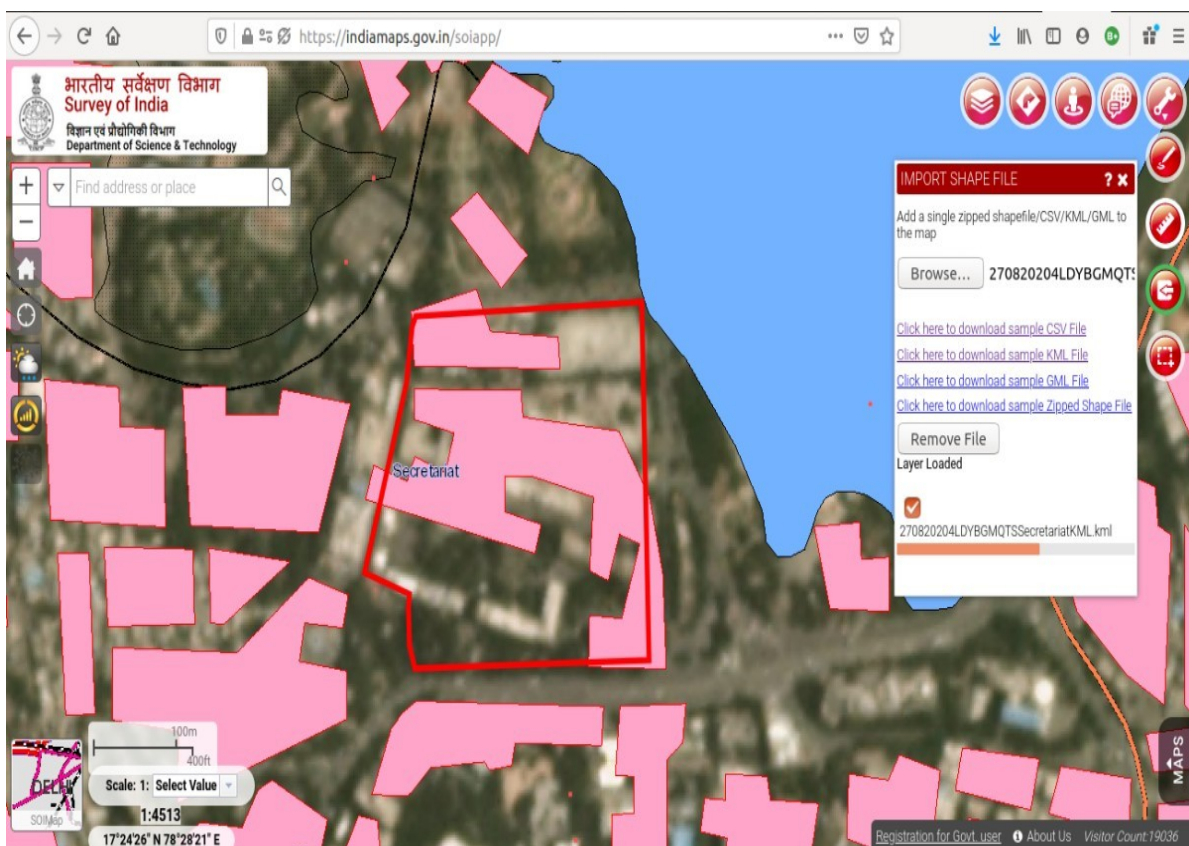
of construction waste been disposed. It has not submitted any information either to the Joint Committee in OA 85/2015 nor to the Joint Committee in OA 107/2020. It has not even applied for permission to the Supreme Court /High Court as specifically required in the SC order of 2005.

Thus the only conclusion that can be drawn that the CMO office that has taken the entire responsibility of demolition has dumped the entire debris in the Hussain Sagar.

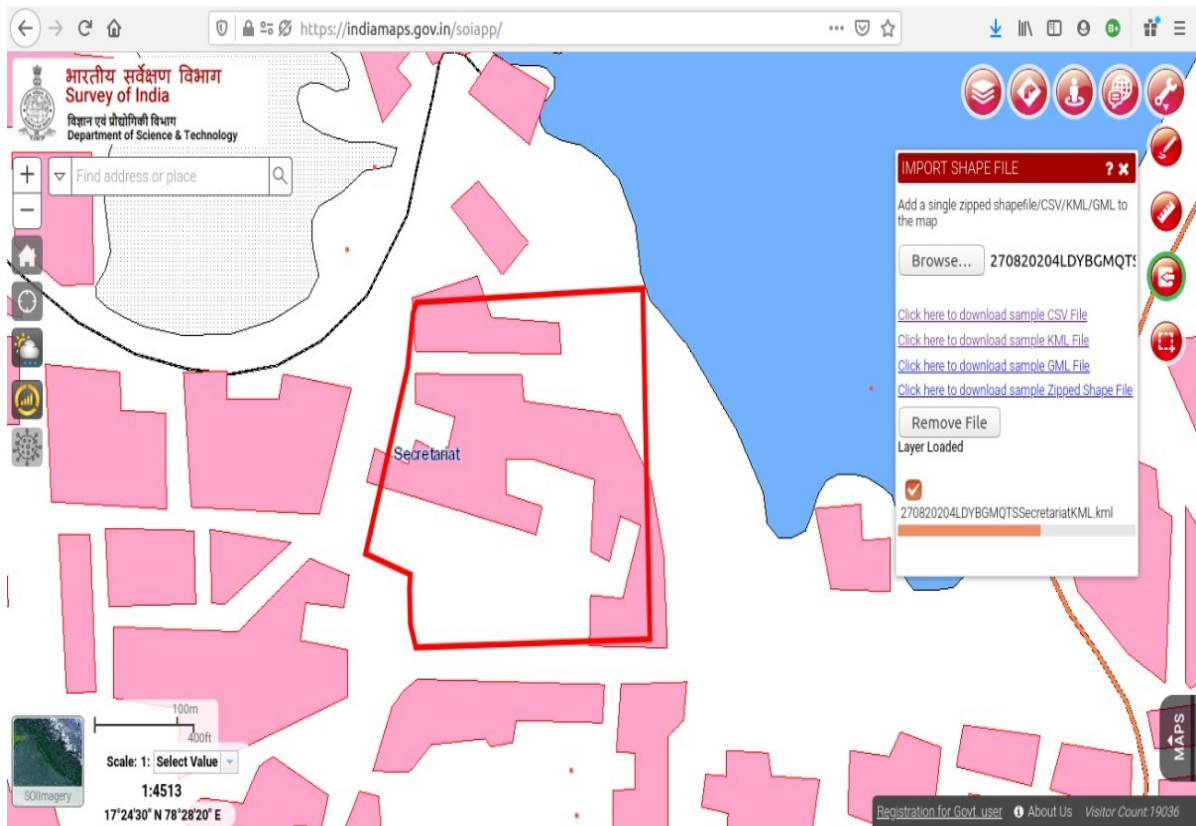
This matter needs urgent probe and facts to be placed before the public and the courts that are handling the Hussain sagar pollution and encroachment cases. CM office and Hussain sagar lake officials should be held accountable.

Objection 5: MAPPED LOCATION OF PROPOSED COMPLEX THAT WOULD SHOCK THE CITIZEN CONSCIENCE – DEATH KNELL FOR THE LAKE

The location of 71,000sqmtrs secretariat complex undertaken by government of telangana would shock the citizen'S and Court's conscience. The images below are startling and revealing. The official kml file downloaded from the environmentclearance.nic.in and overlaid it on Survey of India topomap available at indiamaps.gov.in is appended below for ready reference:



Picture: site location as given by govt of telangana imposed on the official survey of india satellite maps



Picture: site location as given by govt of telangana imposed on the official survey of india maps

We now urge the MoEF&CC authorities Technical Director, FCCID & Joint Director, Impact Assessment Division, to

- (a) Cancel the EC dated 01.09.2020 and reject the recommendation of SEAC dated 23.09.2020 .
- (b) Implement the SC Order of stay of constructions in, on or around Hussain Sagar;
- (c) A high level probe be ordered on all the works in, on and around Hussain Sagar lake including mammoth 71000sqm construction, as contracts being given are highly ambiguous with a drain on public exchequer, violating laws/SC orders and damaging lake,
- (d) the respondents be directed to give details of the demolished waste of more than 2.2 lac metric tons which the State government itself has informed that it has been transported,
- (e) as the site location of proponent government of telangana falls in Hussain sagar governmnet be ordered to drop the secretariat plan and to run an ethical governance and transparent governance and responsible & responsive governance from the existing facilities.
- (f) dissolve the Telangana SEIAA and Telangana SEAC, proceed against their action lacking good faith, and constitute new team.

(g) revoke license of accreditation to the Pridhvi consultants who have given false narrations in documents submitted for EC.

Best

Dr Lubna Sarwath, State Gen Secy, Socialist Party(India), Telangana

Dr Jasveen Jairath, Founder convenor, save our urban lakes

Dr Baburao kalapala, retd chief scientist, IICT, hyderabad

Shri VS P Sastry, retd IRS, founder president, Voice of Indian citizens everywhere (VOICE)