

SOUTH ASIA NETWORK ON DAMS, RIVERS AND PEOPLE

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Concerns regarding Rampur Hydropower Project On Sutlej River in Himachal Pradesh

February 21, 2006

To
Secretary,
Ministry of Environment & Forests, New Delhi

Secretary,
Department of Science, Technology and Environment
Shimla, Himachal Pradesh

Chairman and Member Secretary,
Himachal Pradesh Pollution Control Board
Shimla, Himachal Pradesh

Copy to: President and Country Director,
The World Bank

Dear Sir or Madam,

I am sending to you a letter of concern about the above subject from the people to be affected by the proposed 412 MW Rampur Hydropower Project in Himachal Pradesh in Northern India. You will find a photocopy of the original letter in Hindi along with English translation of the letter. The letter is copied to the World Bank President and Executive Directors as the World Bank is proposing the fund the project. I am also copying this letter to the India Country Director of the World Bank with a request to send to appropriate persons within the Bank and to the offices of Executive Directors of the World Bank.

We would like to endorse the concerns expressed by the letter and also reiterate the demand from the affected people that full EIA and EMP must be made available to the local people in their language, facilitation meeting conducted by credible independent agencies must be held in the affected villages to explain to the people the project, its impacts and also about the rights of the local people around the public hearing and EIA process. Only a month after this has been accomplished should a public hearing should be conducted. The public hearing, if it has not remain credible, should be conducted by credible independent panel where no govt officials or political functionaries should be present. Only after such process is completed, should the project be considered for environmental clearance. Any clearance given without such a due process would not have credibility and is bound to create problems, including misgivings and opposition from local communities.

Moreover, having had a quick look at the EIA document that was put up on the website of the HPPCB, we find that the EIA is fundamentally flawed in following respects, in addition to having a number of other basic deficiencies:

- ⇒ The EIA needs to study the project area at least across one year, but it is based on observations done at just two dates. This is clearly not acceptable from an EIA and this alone disqualifies the EIA to be adequate for impact assessment or for preparing mitigation plans.
- ⇒ The EIA does not have impacts of the proposed transmission line
- ⇒ The EIA does not have impact assessment due to the quarry to be used for the project (see page 6 of executive summary).
- ⇒ The EIA does not have disaster management plan
- ⇒ The EIA does not include an impact assessment study of the various projects existing, under construction and planned in the Sutlej basin. Nor does it have the carrying capacity studies.
- ⇒ The EIA does not analyse the situation about the possible land slides, erosion and such impacts that would happen in the project area and the consequences thereof
- ⇒ The EIA does not have clear maps of the proposed dumping sites, the protective measures required to ensure that the dumped material does not enter the river nor a clear information if the dumping sites are indeed above the HFL mark.
- ⇒ The EIA should exaggerated energy generation figures. For example, it says that 90% dependable energy generation would be 2077.84 MU (on page 1-2 of salient features, 2021.98 MU on page 1-5 of salient features), whereas the World Bank Project ID gives the same figure as 1800 MU. If we look the performance of the upstream

NJP (also WB funded and Rampur is supposed to depend on NJP for water flow for power generation), we see that this level of power generation is impossible.

⇒ The EIA says (page 1-4 of salient features) that it has used discharges observed from 1970 to 1986 to generate the discharge series from 1963 to 2004. This is very strange. Why have the actual discharge figures from 1986 to 2004 also used?

⇒ The cost figure of Rs 2424 crores for a 412 MW HEP without having to construct a dam or a desilting mechanism is very high. None of the project features justify such a high cost. The EIA does not go into the issue of options assessment in any credible manner to assess the non project options of comparable costs and benefits. Himachal Pradesh already being power surplus, does not need the project its own requirements. Moreover, most HEPs in North India, as is the case with Rampur, do not provide peaking power, which is in short supply in Northern Grid. Under the circumstances, there are serious question marks about the justification of such a high cost project.

⇒ The statement (page 1-6 of salient features) that "The cost per MW of installation works out Rs 5.39 crores." is wrong if we care to look at the previous page, where the per MW figures are indicated to be almost Rs 6 per MW.

⇒ The EIA shows its biases (see bottom of page 1-6 of the salient features) when it concludes that "The project features suggest that the scheme is technically feasible and economically attractive and should be immediately implemented". This is a shocking statement to be in EIA in any case. Moreover, there is absolutely no material before the EIA to reach such a conclusion. This in fact makes the EIA agency as unacceptable to take up the task of taking up EIA.

⇒ The design flood figure given on page 1-4 (salient features) is 7151 cumecs and on page 1-7 (salient features) as 5660 cumecs. This clearly shows the callousness and ignorance of such crucial factors of the project on the part of EIA agency.

⇒ The callousness of the EIA agency is also reflected at many other places, including: Table 2 on page 2-3 of Executive summary has no units for water flow discharge figures, table 4 on page 5 of Executive summary has no units for the figures given,

⇒ The EIA says that more land will be required for the project "temporarily... for storage of quarried material", but it does not give how much, where, what will be impact, etc. The EIA should have full information about the land requirement, which it does not have.

⇒ The EIA makes a number of statements that shows that the EIA agency has no idea about the reality or is trying to mislead the people. For example on page 7 of Executive summary it says "However, downstream of NJ dam site sediments get settled in the reservoir. Thus, water is relatively silt free downstream of dam site." This statement is not only wrongly constructed, but it also gives wrong impression as the fact is that silt separated from water at NJP is released to the river downstream from the diversion site.

⇒ If we look at the fact that only 18.3593 ha of land is to be used for disposal (see page 7 of Exec Summary) of 2.76 million cubic meters of muck, we see that average height of muck at the sites would be 15 mts, which is too high considering the terrain of the project area.

⇒ We have seen that many of the crucial measures of EMP for NJP are yet to be completed even two years after project completion. Moreover, NJP faced a lot of surprised during project construction and operation due to inadequate appraisal. We see that worse mistakes are being committed in case of Rampur.

Under the circumstances, there is need for a fresh EIA to be done by a more credible agency, in full consultation with the people of the area and others concerned and only on the basis of such an EIA and EMP can the project be considered for clearance. Till such time, all works related to the project should be stopped in the interests of the people of the area, state, country and in the interest of power sector.

We would be happy to answer any questions you may have. Looking forward to your acknowledgement and responses,

Yours sincerely,

Himanshu Thakkar
For SANDRP

Enclosures: As mentioned above.