

Report on the site inspection of limestone mining proposals (ML no. 121/92, 19/93 and 59/87), Kotri-Chechat, Ramganj Mandi, District Kota, Rajasthan.

Background:

Standing Committee of the National Board for Wildlife in its 28th meeting held on 20/3/2013 decided that Dr. Divyabhanusinh Chavda, Member NBWL and an officer of National Tiger Conservation Authority (NTCA) shall undertake the site inspection and submit the report before further consideration of the proposals for renewal/capacity expansion of limestone mining *lease no. 121/92, (M/s Abdul Sattar S/o Abdul Karim) & 59/87 (M/s Goodwill Advance stone company)* at Kotri-Chechat, Tehsil Ramaganj Mandi, District Kota in Rajasthan. The necessary instructions were issued vide MoEF letter no. S. No. 6-43/2007-WL/ (28th Meeting) dated 5th April, 2013 & even no. letter dated 18th June 2013. *Lease no. 19/92, (M/s Abdul Sattar S/o Abdul Karim)* was not directly referred to the team by NBWL vide above letters, however the copy of the proposal was sent to the team by CWLW, Rajasthan, vide letter no. F 4(T).../2013/5371 dated 12/7/2013. After perusal of Minutes of 28th meeting of NBWL, it was seen that this proposal too was recommended for the inspection by NBWL. Hence this ML site was also inspected during the present visit.

The field visit and the submission of report were delayed because Mr. Sanjaykumar, AIG, NTCA who was initially nominated could not join the team due to his compulsory Mid-Career Training. Subsequently AIG, NTCA was nominated by NTCA vide letter no F. No. 7-9/2010 NTCA (Vol. III) dated 4 July 2013 with a direction to submit the report to NTCA.

The team completed the site inspection between 11/8/2011 to 13/8/2013.

Line of Action:

Detailed project proposals were obtained from the Chief Wildlife Warden, Rajasthan. During the perusal of the maps in the proposal and the landscape level maps available in the report 'Status of Tiger in India'- 2010, it was observed that Madhya Pradesh state boundary limits the Southern side of Kota district close to the mining site. Hence Chief Wildlife Warden, Madhya Pradesh was also contacted and after confirmation of presence of sanctuary in Mandsaur district,

MP; further correspondence was made to the, DFO Mandsaur division, the in-charge of Gandhisagar sanctuary- which is contiguous with the Kota district towards the Kotri-Chechat area.

The team visited the proposed mining sites, nearby PAs including Jawahar Sagar & Darra Sanctuary, Mukandara National Park (now Mukandara hills tiger reserve) and Gandhisagar sanctuary. Detailed discussion with the CCF (Wildlife) Kota, DCF (Wildlife) Mukandara Hills Tiger Reserve & other field officers and the lease holders were also held during the field visit.

Details of Field Visit:

The AIG, NTCA visited the area of Gandhisagar Sanctuary on 11 & 12 August 2013. Sanctuary boundaries towards Kota were also inspected and interaction was held with the local forest staff as well as residents of bordering villages *Kani & Harigad*.

Dr. Divyabhanusinh Chavda arrived to the mining site directly from Kota. The team along with CCF Wildlife Kota and DCF Mukandra inspected the mining sites. *Mr. Abul Sattar, S/o Abdul Karim*, proponent of the limestone mining lease no 121/92 & 19/93 was present on the site and confirmed the localities. Owner of M/s Goodwill advanced stone (ML no. 59/87) was not present despite the advance notice sent by the DCF Mukandra Hills. His field assistant showed the site.

GPS reading were recorded at various places to confirm the sites *vis-a-vis* locations given in the proposal.

Findings:

1. As certified by DCF (WL) Kota, all the proposed ML sites are in the *revenue land*. However the proponents claimed it as a *private land*. The surrounding area is agricultural holding, a part of triangular basin formed by two ranges of *Vindya*, the northern range forming Mukandara Hills TR & Southern hills forming *Mandsaur* division (MP) & *Chitaurgarh* forest division (Rajasthan). (Image no. 7 & 9 below.)
2. There are about 20 existing mining leases of various sizes which are clustered in Kotri-Chechat area, about 5 Km in length and 1.5 km in width north to Chechat village. Entire mining zone has a typical opencast set-up of several dug up pits and mounds of overburden. (Image no. 5, 6 & 8 below). Some plantation has been found raised at the

existing ML near 121/92 of M/s Abdul Sattar. Total number of existing MLs in *Chechat-Modak-Ramganjmandi* zone is 52 including 51 building quality and 1 cement bed limestone. (Confirmed through the office of Mining Engineer, Ramganjmandi). The Cement factory is 3 km away from the proposed ML site at Modak. This entire mining zone runs almost parallel to the Mukandara hill NP.

3. Towards north, within the zone of 10 km Radius from ML, falls the core area of recently proposed Mukandara hills tiger reserve. The area of tiger reserve which falls in 10 km zone is about 50 sq. km (estimation based on the map scale). The boundary of Darra sanctuary/Mukandara National park is about 6 Km from 121/92, 6.25 km from 19/93 and 6.8 Km from 59/87. Certificate given by DCF Wildlife Kota vide letter no. 6971 dt. 14.11.2011 in the proposal has wrongly mentioned mining lease as 59/78 which actually should be 59/87. Again in the same ML, project proponents have wrongly mentioned the distance between buffer zone of ML & boundary of National park as 5.5 km, which is actually 1.8 km because the distance between ML core and Mukandara National park boundary is 6.8 km-(see EIA pro-forma item no. 8 page Q-4). Similarly, certificates given by DCF Wildlife for ML 121/92 & 19/93 do not mention the ML number and have incorrectly certified that there is no archeological site in the area. There are archeological sites within the buffer zone of ML.
4. There is no buffer zone to the tiger reserve on the Southern side near ML, except a small patch near Amjhar. (About 7.5 Km from all MLs). The eco-sensitive zone around the National Park is not yet notified, but proposed width is about 1-2 km.
5. Gandhisagar sanctuary, in Madhya Pradesh is about 8 km away from the proposed ML towards South. (Confirmed by AIG, NTCA). The area under 10 km zone is about 15-20 sq. km. (estimation based on the map scale). None of the proposals/maps submitted by the proponents & forest department to the State Level Appraisal Committee/MoEF/NBWL has mentioned this fact. The map appended in lease no 59/87 is simply the copy of maps in proposals of ML 121/92 & 19/93. The radial zone from this particular ML site actually differs from what is shown in the map.
6. During the scrutiny of the proposals, it was found that historic Darra-Mukandara temple (including small fortress called *Shikargarh –Ablee Ka Mahal* of late medieval

period & stone temple *Bhim ki Chauri* & statues of Gupta period) which is notified in 1951 by the Archeological Survey of India as Nationally important monument (N-RJ-96) is within 10 km of the core zone & within 5 km of the buffer zone of the ML sites. (Confirmed from the Archeological Survey of India, Jaipur circle office). *Shahar Panah/Darah fortification* is listed under state dept. of Archeology & museum as well. This fact has also not been mentioned in the EIA/EMP reports. (See EIA pro-forma for ML 59/87 item no. 8 page Q-5 & Certificates given by DCF Wildlife Kota).

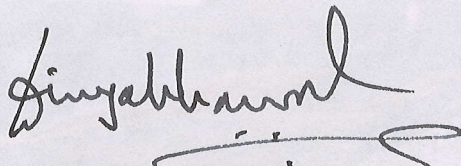
7. The entire area of Mukandra hills National Park, which was shown within 10 km zone from the ML site, now falls in the newly declared Mukandara hills tiger reserve.
8. Interaction with the field staff of Gandhisagar sanctuary (Forester, *Kethuri* circle, Mr. Prajapati K. L.) & villagers of *Kani & Harigarh* village along the Gandhisagar boundary, AIG, NTCA found that a tiger presence was reported at *Harigarh* nala sometimes in 2003. There was no other tiger habitat nearby in MP. During the same period, tiger was reported from the Mukandara hills, which subsequently got killed in the train accident near Darra. Although tiger was sighted in Gandhisagar by the villagers and pugmark tracings and plaster casts were collected by the field staff, tiger presence was not followed further considering its sudden appearance and disappearance. It is possible that the tiger which was strayed into Mukandara went further south to Gandhisagar and then travelled back to Darra where he was subsequently killed. The Report on the '*Status of Tiger in India- 2008*' (pp-54) has also highlighted the potential for movement of tiger from Mukandara hills to Mandsaur division in MP.
9. There is limited institutional mechanism of monitoring restorative & remedial activities and compliance for existing mines as required under the lease conditions.

Recommendations:

1. The ML proposals, submitted to the State level Expert Appraisal Committee /MoEF/NBWL as required under Forest Conservation act 1980 & Environmental Protection act 1986 and the rules thereunder by the state government/lessee are factually incorrect at some places. (This can attract the provision of clause no. 4 of EIA notification S. O. 60 (E) dated 27/1/1994 which may result in the cancellation of lease

subsequently) Therefore the proposals may be returned to the state government/agency for the corrections of the facts highlighted above.

2. Since the distance between two PAs i.e. Mukandra NP & Gandhisagar sanctuary is about 10 to 15 Km and since Mukandara is declared as tiger reserve recently, state forest department may be directed to explore possible corridor connectivity/ stepping stones between these two areas based on the empirical/scientific data. These studies will be also be useful in identifying/suggesting further mitigating measures while considering the revised lease proposals for sanction in the future.
3. Considering the fairly large patch involved in the mining activities around Chechat area, presence of cement factory nearby, past empirical data of presence of wildlife and large number of vehicles carrying minerals through Mukandara tiger reserve; it is recommended to consider the cumulative/strategic impact of the entire mining activities in that region (as raised in TORs of SEAC for EIA/EMP).
4. Approval to the present ML proposals may be considered in future only on the basis of revised proposals and revised comments/conditions of the state government, including those of authorities of Mukandara tiger reserve. Prescriptions under Tiger Conservation Plan - Core, buffer and corridor- prepared as per the NTCA guidelines or the general principles of landscape level management of tiger habitat may be considered by authorities while providing comments. The approval will be further subject to the Hon. Supreme court's orders delivered in various mining cases.
5. State may be directed to ensure the periodic monitoring and compliance of terms & conditions given to the existing mining leases on the backdrop of declaration of the nearby area as a tiger reserve. Tiger reserve authorities should also be included in the monitoring team.



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2/8/13

Maps & Photographs

<p>1. Googleearth Map showing Mukandara tiger reserve 10 km radial zone from mining sites (towards North)</p>	<p>2. Googleearth Map showing Gandhisagar sanctuary 10 km radial zone from mining sites (towards South)</p>
	
<p>3. Gandhisagar sanctuary (hills), as seen from Chechat side (seen Harigarh village Agri. Fields)</p>	<p>4. Bird's eye view of Kotri-Chechat basin, (as seen from the hills near Eklingpura)</p>
	
<p>5. Existing mines (M/s Abdul Sattar)</p>	<p>6. Existing Mine (M/s Goodwill advance stone)</p>
	

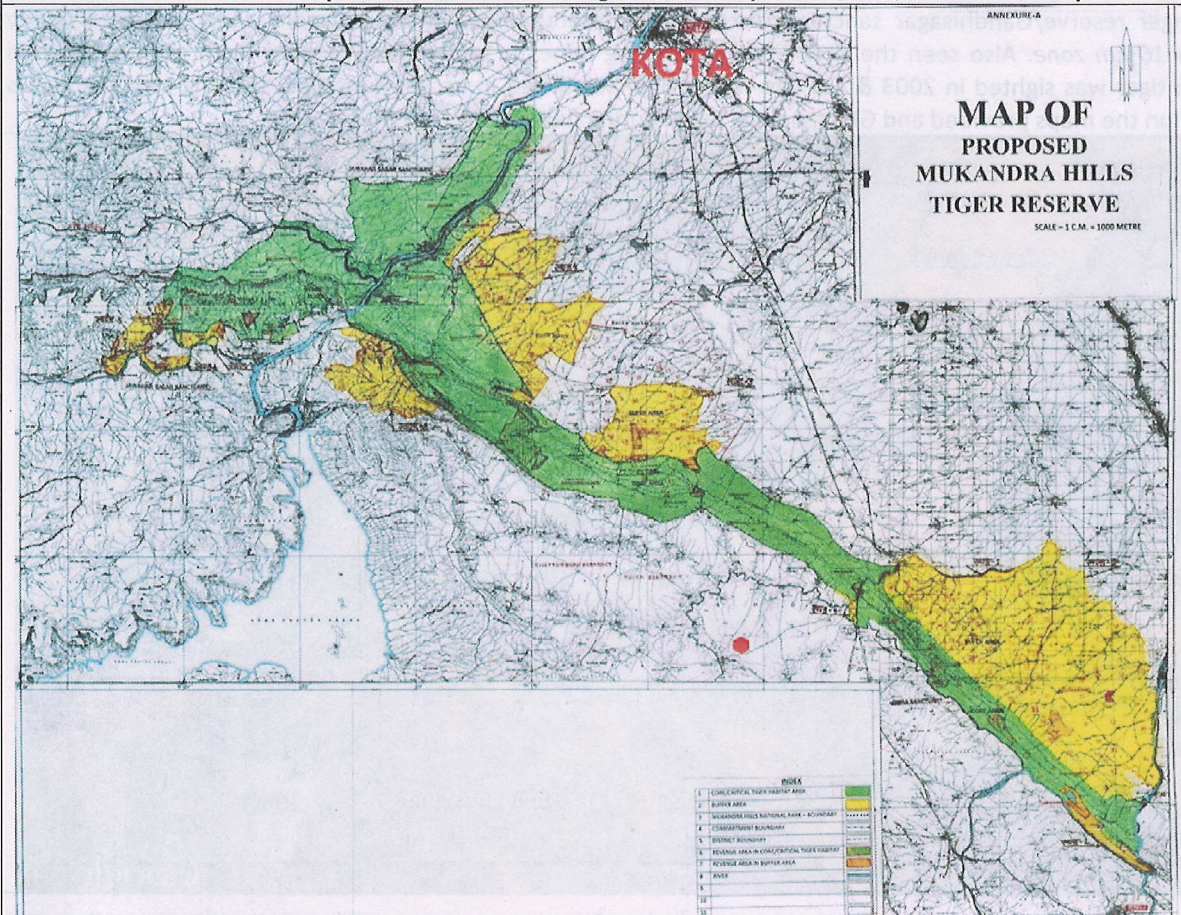
7. Google-earth map around mining sites. Red lines show 10 km distance between mining sites & Mukandara hills tiger reserve/Gandhisagar sanctuary/Archeological monuments. *Yellow polygons show the area falling within 10 km zone.* Also seen the sites of other existing mines in white tone, cement factory, Harigarh nala where tiger was sighted in 2003 & rail line where tiger was killed in accident in 2003. (Mining area marked is based on the maps provided and GPS readings taken during field visit)



8. Arial view of entire mining zone near Chechat village (about 5 km x1.5 km)



9. Map of Mukandara Hill Tiger Reserve (Green-Core, Yellow-Buffer)



10. A Part of MHTR & location of ML sites

