Comments on the Response from APGCL for the Proposed Lower Kopili HEP on Kopili River in Assam

Issues for Expert Appraisal Committee

The Lower Kopili Hydro Electric project on Kopili River in Assam will be considered for TOR clearance in the 69th EAC on 11-12 Nov 2013. But including the project in the agenda of the meeting just five day before the meeting, i.e. on November 6, 2013 is clearly a wrong practice on the part of EAC. The statutory body should refrain from such activities in future.

The inclusion of Lower Kopili in the 69th EAC meeting agenda has been done on the basis of the letter from Resident Engineer (Liaison), of Assam Power Generation Corporation Limited (Letter no APGCL/CGM(H)/W/140/Pt-III/65) which was dated on 01/11/2013 (available at http://environmentclearance.nic.in/writereaddata/Public%20Hearing/Folder7/1111412412121LowerKopili.pdf). This implies that the Lower Kopili project should not have been in the agenda of forthcoming EAC meeting, since it gives very less time to deal with the relevant issues.

In the same letter APGCL has also answered some of the questions raised in the submission made by SANDRP in the 68th EAC meeting (submission on the project is available at - http://sandrp.wordpress.com/2013/09/21/eac-must-address-issues-first-before-clearing-lower-kopili-hep/) but their answers and responses are far from being called as satisfactory. APGCL has agreed with several of our concerns and agreed to take them into account in the EIA study(additional aspects to be covered in the TOR for CEIA study are given below). The response also mentioned about the loan of US$ 300 million sought for the construction of Lower Kopili HEP. This in our view will further increase the cost of the project and also have foreign exchange risks. There are several concerns which need urgent attention along with a new threat of from acidic contamination of Kopili waters.

Newer Threats from Acidic Contamination in Kopili The issue of acidic contamination in Kopili river was reiterated by a front page news published in Asomiya Pratidin on 25/10/2013 with the headline "Maratmok Acidor Roop Loise Kopilir Paniye(The waters of Kopili have become dangerous acid)". The news report said that a report was submitted to APGCL by noted engineer Jyotindra Narayan Khatoniyar on the issue of acidic contamination in the river Kopili after a long term study. The news report stated that due to acidic contamination, equipments of the hydropower project which were under water had been damaged. These equipments include power house pipe, fuller tube, turbine and parts of the generator. According to the report NEEPCO is spending Rs. 35 crores in repairing these equipments.

The report also made a shocking revelation that the acidic contaminated waters have put an acidic layer on the concrete dam removing the cement layer of the dam. This poses serious threat to the safety of existing Kopili dam. This threat need to be thoroughly assessed and any probably impact on the proposed Lower Kopili HEP should also be included in the assessment. The findings of the assessment should be put in public domain. Seeking a copy

of the report submitted by engineer J.N. Khatoniar, we had written to the Chief General Manager(Hydro) of APGCL on 26/10/2013 but got no response.

Inadequate spillway capacity at proposes Lower Kopili project We had stated this concern in our earlier submission as well but APGCL's reply does not at all answer the question. The catchment area of upstream Khandong is 1256 sq km whereas the same for proposed Lower Kopili HEP is 2076.62 sq km. The spillway capacity of the upstream Khandong dam 15471.3 cumecs(as stated the National Register for Dams of CWC) but then the spillway capacity for Lower Kopili is only 11030 cumec. This surprising since Lower Kopili HEP with a greater catchment area than upstream Khandong dam, should have larger spillway capacity. The response from APGCL doesn't at all answer this question.

No Mention of Options Assessment In our previous submission we have written in detail about options assessment which must be done for the Lower Kopili HEP. The options assessment is must for this project keeping in mind the huge costs and area required for the project. We have also received a letter from APGCL asking for detail reference provided in the options assessment section in the previous submission dated 23/09/2013. We had sent them a detailed reply on 25/10/2013. But even after that to find no mention of options assessment for the proposed project is really surprising.

Impacts Climate Change The APGCL response does not mention anything about the possible impact of the climate change on the dam as well as on the Kopili River. In our previous submission also we have mentioned about this. Besides, it should also include the impacts of the dam on adaptation capacity of the local people.

Additional Aspects to be Covered in the TOR for CEIA based SANDRP Submission
Following the submission by SANDRP on Lower Kopili HEP to 68th EAC meeting APGCL has agreed to include the following additional aspects in the TOR of environment impact assessment study of the project.

1. Cumulative impact of the operation of Kopili reservoir of Khandong dam, Longku dam and Lower Kopili hydroelectric projects.

2. The rights of Dimasa people shall be protected and the same shall be covered as a part of R&R Plan. In addition, any measure suggested by the state government of Assam, for PAFs of Dimasa tribe shall also form part of R&R Plan.

3. The geo-morphological and neo-tectonic mapping shall be done as a part of the study. These maps alongwith site specific studies shall be included in the documents for appraisal by EAC for River Valley Projects of Ministry of Environment and Forest and National Committee on Seismic Design Parameters, Central Water Commission. The recommendations of these agencies will be suitably incorporated in project design, construction as well as operation.

4. Downstream impacts assessment study shall be conducted.

5. Impacts on hydrological regime and aquatic ecology due to peaking power operation.

6. Assessment of optimum reservoir operation.
7. Management of impacts due to silt flows downstream from desilting chamber, silt flushing in monsoon.
8. Impacts on groundwater level in downstream areas.
9. Impacts due to tunneling and blasting.
10. Impacts due to mining for abstraction of construction material.
11. Impacts due to backwater effect especially during monsoon.
12. Impacts due to filling up of reservoir upto MWL.
13. Existence of wetlands, water courses and other water bodies in the study area.

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