Comments on the proposal for extension of validity of TOR and reduction of Installed Capacity of Dinchang project from 360 MW to 252 MW

The Dinchang hydropower project is a hydropower project on Digo River 4.5 km downstream of Selari village, near Bomdila town in West Kameng District. The project is being constructed by KSK Dinchang Power Company Private Limited from Hyderabad. The project was given ToR clearance on 8th November 2011 to construct a concrete dam with 360 MW installed capacity and 69 m high from deepest foundation level (42 m high above riverbed level). Though the ToR was given for 360 MW, the MoA signed with Government of Arunachal on 11.09/2007 was initially for 90 MW.

The Bichome basin study by WAPCOS says (p 32) about the Dinchang project: "The Diversion Site is located about 2 km downstream of Selari Bridge on the river Digo".

Delay Uploading the Necessary Documents in MoEF website The Form I and Background information of the project was uploaded on the MoEF website on 8th and 9th of November 2013, just three days before the project being considered by EAC. The MoEF should refrain from this ill practice of delay in uploading necessary project documents. The necessary documents should be uploaded at-least two weeks before any EAC meeting.

A letter of Sept 2013from CEA states three reasons for reduction in installed capacity:

1. Submergence of Selari Bridge

2. To have a free riverine reach of 1 km between tail race of upstream Khuitam project and reservoir tip of Dinchang

3. Due to land occupied by Ministry of Defence (DLRA) for the establishment of DRL

This was mentioned in a letter from project proponent (MoE&F,ND/SKDT/1550101/20) dated on 3rd October 2013. There are some serious critical issues here which are listed below.

Critical Issues

What is the actual FRL level before the reduction: The minutes of 46th EAC meeting states "Dinchang project is planned with FRL of 1160 m there by leaving no riverine stretch free between the two projects."

But the letter sent from project proponent KSK Group mentions this as 1157 m. But the letter from CEA (letter no No. 2/ARP/46/CEA/11-PAC/5443-44 dated 13th September 2013) states "the developer revised the FRL from 1190 m to 1138 m." All these figures are very contradictory and without confirming the exact figure of the previous FRL. This also means that possibly the project proponent had provided wrong information to the EAC and they should be questioned on this. This is particularly since a technical body like CEA is saying that the FRL earlier was 1190 m. This is also shocking since the TWL of upstream Khuitam

project is 1173 m. If that is the case, how come the Dinchang was being designed with FRL of 1190m?

Doubts on the free flowing length of the river between upstream Khuitam and Dinchang There is contradictory information about the length of free flowing river between upstream Khuitam project and Dinchang. The letter from the project proponent mentioned "that based on the Revised Full Reservoir Level(FRL) at El. 1138 m, the submergence area gets reduced to 6.71 ha as against earlier 23.3 ha and also leads to increased free Riverine flow of approximately 2.4 km (against earlier 1 km) up to the TWL of upstream Khuitam project." This seems in contradiction with the discussion in the EAC regarding this in its 46th meeting. The EAC said "It is considered that Alternative-6 is more preferred proposal with FRL lowered to 1120-1130 m resulting in 2.0 km of free riverine reach." Now if EAC has sad that 1130 m FRL level would lead to a free riverine stretch of 2.0 km, than the claim of FRL of 1138 m leading to 2.4 km of free riverine stretch is questionable.

Besides, the letter from CEA (letter no No. 2/ARP/46/CEA/11-PAC/5443-44 dated 13th September 2013) also mentioned that the developer revised the FRL from 1190 m to 1138 m to "have a free riverine reach of 01 km between tail race of Khuitam (u/s project of Dinchang) and reservoir tip of Dinchang…" This shows that the claim of the PP is questionable and this repeated tendency of the PP to mislead EAC by feeding wrong information is unacceptable.

No mention of the projects in the downstream and free flowing river below Dinchang In the letter sent by project proponent, a letter from MoEF (F. No. J-12011/50/2010-IA-I) dated 8th November 2011 is also attached which is the TOR clearance of the project. But this letter hides information about projects downstream of Dinchang. The letter states "As the downstream Salal HEP is 30 km away and there is not planned project in between, therefore the downstream impact on the river will be studied up to the reservoir tip of Salal HEP." But the minutes of 47th EAC meeting held on 26th February 2013 states a complete different picture regarding downstream dams. The minutes states "FRL of downstream Bichom Dam is El 770 m. This would allow free flow of approx. 3.74 km between Dinchang tail and Bichom Dam reservoir tip." The TWL of Dinchang is El. 800 m as stated in the letter by the project proponent. Was the wrong statement in the TOR Clearance letter of MoEF due to wrong information by the PP? This is another issue that needs resolution.

EAC warning earlier Minutes of 46th EAC meeting of Jan 2011 said while discussing this project: "The EAC was of the opinion that it means the installed capacity may be changed again. In that case the proponent has to come with fresh proposal." EAC needs to put such promises in practice.

Capacity goes down, reservoir area goes down, but land requirement goes up? The new proposal is for reduced capacity from 360 (90X4) MW to 252 (84X3) MW, with reduced reservoir submergence from 23.3 ha to 6.71 ha, forest land requirement is down from 36 ha to 31 ha. And yet the total land requirement for the project has gone up from 82.13 ha to 105.2 ha! This sounds strange and no reasons are given. The PP must answer why this is the case.

Wrong answers in form 1 There are several wrong answers in new form 1. For example the answer for long term decommissioning issues in points 1.26 and 1.27 is given no, which is not correct. The EAC must ask the PP to submit correct answers.

Fish ladder The FRL of the new proposal above the river bed level is 20 m and the PP must be asked to put a fish ladder and allow 30 % flows in monsoon and 25-50% flows in non monsoon months.

Adequate spillway capacity The PP must be asked to put sufficient spillway capacity. Earlier proposal had provision for 5 gates of 10 m (w) X 14 m (H), which should be kept in mind.

Additional TORs The PP must be asked to include additional TORs including impact of climate change on project, impact project on adaptation capacity of the people, impact of mining of materials for the project, impact of changed sedimentation, and include compensatory measures for those who lose out on fisheries, among other TORs we suggested earlier for other projects.

Conclusion The EAC must try to address these concerns and bring the actual facts to light. In light of these the EAC should ask the proponent to first clarify all such important issues before considering the proposal for revised capacity or extension of TOR. How did the EAC approve the earlier TOR, violating its own rather weak norms (1 km distance between projects) is also an important point that EAC should look into. The repeated attempt by the PP to mislead the EAC should also be looked into.

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