

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE  
BENCH AT CHENNAI**

(Under Section 18(1) read with Sections 14, 15 of National Green Tribunal Act,  
2010)

**Original Application No. 137 of 2021**

**IN THE MATTER OF**

Gutha Gunasekhar & ORS

..... Applicants

**-Vs-**

Union of India & ORS

..... Respondents

**INDEX**

<b>S.No.</b>	<b>Description</b>	<b>Pg. No.</b>
1.	ADDITIONAL COUNTER AFFIDAVIT FILED ON BEHALF OF RESPONDENTS NO. 3 & 4	1-19
2	<b>Annexure-A:</b> A pictorial depiction stroke of flowchart showing the phase manner in which the project has been carried out	20

**Place: Vijayawada**

**Date: 07-02-2022**

*Madhuri Donti Reddy*

**M/S MADHURI DONTI REDDY**

**ADVOCATE**

**STANDING COUNCIL FOR GOVERNMENT OF**

**ANDHRA PRADESH**

**A.P. POLLUTION CONTROL BOARD**

**T.T.D. SUPREME COURT OF INDIA**

#S2, Royal Castle, 26, Gill Nagar Extension, Choolaimedu,

Chennai – 600 094. Mobile: 98407 98460 / 6383121322

**COUNSEL FOR RESPONDENT 3 & 4**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE  
BENCH AT CHENNAI**

(Under Section 18(1) read with Sections 14, 15 of National Green Tribunal Act,  
2010)

**Original Application No 137 of 2021**

**IN THE MATTER OF:**

**1 Gutha Gunasekhar,**

Age: 36 years,  
S/o. G. Rama Krishnama Naidu,  
Nagillavaripalli village, Peddauppara palli,  
SomalaMandal, Chittoor district,  
Andhra Pradesh – 517257,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9886681956.

**2 Gunturi Chandrababu,**

Age: 31 years,  
S/o. Gunturi Nagaraju Naidu,  
Ramakrishnapuram village,  
Avulapalle, Somala Mandal,  
Chittoor district,  
Andhra Pradesh – 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 7702822618.

**3 Sannapaneni Yadava Naidu,**

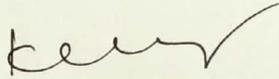
Age: 37 years,  
S/o. Sannapaneu Krishnama Naidu,  
Bayareddiapalli Village,  
Avulapalle, Somala Mandal,  
Chittoor district,  
Andhra Pradesh – 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),

**4 S. Lepakshi Naidu,**

Age: 39 years,  
S/o. S. Samkara Naidu,  
Ramakrishnapuram village,  
Avulapalle, Somala Mandal,  
Chittoor district,  
Andhra Pradesh – 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9989641278

**5 Banala Chandrachari,**

Age: 32 years,  
S/o. B. Ramalingachari,  
Bayareddy palle,  
Avulapalli Village,

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

Somala Chittoor- 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9989641278

**6 Sompalli Lakshmi Naidu**

Age: 64 years,  
S/o. Sompalle Lakshmaiah Naidu,  
Chinnadevulakuppam village,  
Avulapalle, Somala Mandal,  
Chittoor District,  
Andhra Pradesh - 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9908820279.

**7 Gutha Sundaraiah Naidu**

Age: 52 years,  
S/o. G. Srinivasulu Naidu,  
Nagillavari palle,  
Somala, Chittoor - 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9886681956.

**8 Sannapanenu Balaji,**

Age: 25 years,  
S/o. S. Markanda Naidu,  
Bayareddy palle,  
Avulapalli Village,  
Somala Chittoor- 517527,  
Phone No: 9886681956.

**9 Gutha Keshavulu Naidu,**

S/o. G. Srinivasulu Naidu,  
Nagillavari palle  
Peddauppara Palle,  
Somala, Chittoor -517257,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Mobile No: 9886681956.

**10 Sompalli Changalraya Naidu,**

Age: 46 years  
S/o Sompalle Rajendra Naidu  
TV Nagar, Subbarao Street, Tirupathi,  
Chittoor District, Andhra Pradesh - 517527,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Phone No: 9886681956.

**11 Sannapaneni Vasudeva Naidu,**

Age: 46 years,  
S/o. S. Venkaratham Naidu,

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

Chinna Devulakuppam,  
Avulapalli Village, Somala Chittoor - 517527,  
Mobile No: 9886681956.

**12 J. Chinni Krishnama Naidu**

Age: 62 years,  
S/o. Late J. Sankaraiah Naidu,  
Chinna Devulakuppam,  
Avulapalli Village,  
Somala Chittoor - 517527,  
Mobile No: 9886681956.

**13 Gutha Chandra Sekhar Naidu,**

Age : 62 years  
S/o. Late G. Munaswamy Naidu,  
Nagillavari Palli village, Peddauppara Palle,  
Somala, Madal, Chittoor - District,  
Andhra Pradesh - 517257,  
Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com),  
Mobile No: 9886681956.

**14 Tenkayala Somasekhar,**

Age 48, S/o. T. Rajanna,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 9573494776.  
Mail id: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**15 Nadimanti Danajaya Reddy,**

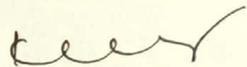
Age 42, S/o. N. Arjun Reddy,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 91771624466. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**16 Sannapaneni Lokaiah Naidu,**

Age:64,S/o. S. Akkulappa,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 9963156826. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**17 Sara Chinnabba,**

Age: 79, S/o. S. Pullaiah,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 8374834812. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

  
Special Chief Secretary to Gov.  
Water Resources Department  
A.P. Secretariat, Amaravathi

**18 Baddaluri Thygaraja Naidu,**

Age: 38, S/o. B. Sreeramulu Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9100232163. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**19 Badhuluri Ramesh Naidu,**

Aged: 41, S/o. B. Chengam Naidu,  
 Ramakrishnapuram, Avulapalli,  
 Patrapalle (P), Somala,  
 Chittoor, AP-517257, Mobile: 7893122835,  
 Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**20 Balana Munirathnam Achhari,**

Age: 72, S/o. B. Srinivasachhari,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 8106862866, . Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**21 Kollu Samantha,**

Aged 46, W/o. K. Muniraja Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 6300374146. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**22 Veerappagari Jayamma,**

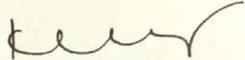
Aged: 49, W/o. V. Venkataramaiah,  
 Nagillavari Palli, Peddauppara palli (P), Somala,  
 Chittoor, AP-517 257, Mobile: 9704230041,  
 Mail Id: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**23 Ms. Shaik Shakeela,**

Aged: 38, D/o. Shaik gudu Saheb,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 8978429912. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**24 Mrs. Padamata Lakshamma, Age 49,**

W/o. P. Muniraja,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 8374834812. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

  
 Special Chief Secretary to Govt.  
 Water Resources Department  
 A.P. Secretariat, Amaravathi

**25 Mrs. Sannapaneni Nilavathi,**

Aged: 46, W/o. Doraswamy Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9866003208. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**26 Mrs. Baddaluri Parvatamma,**

Aged : 49, W/o. B. Sreeramulu Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9515780879. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**27 Arella Krishnama Naidu,**

aged 79, S/o. A. Chengam Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 8978984144. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**28 S. Krishnaiah,**

age 75, S/o. S. Pullaiah,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9705550185. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**29 Vediapati Guruswami Naidu,**

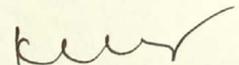
age: 63, S/o. V. Rama Naidu,  
 Chinnadevula Kuppam, Avulapalli,  
 Peddauppara Palli (P),  
 Somala, Chittoor, AP-517 257,  
 Mobile : 9010194365.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**30 Tenkayala Subramanyam,**

Age: 60, S/o. T. Rajanna,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9704031745. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**31 Sannapaneni Prabhakar Naidu,**

Age: 47, S/o. S. Doraiswamy Naidu,  
 Bayyareddy Palli, Avulapalli,  
 Peddauppara Palli (P), Somala,  
 Chittoor, AP -517 257,  
 Mobile: 9652088036. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)



Special Chief Secretary to Govt.  
 Water Resources Department  
 A.P. Secretariat, Amaravathi

**32 M. Manohar,**

Age : 44, S/o. M. Gurappa,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 7032968301. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**33 Sompalli Dorairaj,**

age 37,S/o. S. Rajendra Naidu,  
Chinnadevula Kuppam, Avulapalli,  
Peddauppara Palli (P),  
Somala, Chittoor, AP-517 257,  
Mobile : 9542551660.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**34 Chinnareddy Sreeramulu Reddy,**

Age: 75,S/o. C. Sidda Reddy,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 8897035848. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**35 Sompalli Mohan Naidu,**

age: 70,S/o. S. Lakshmaiah Naidu,  
Chinnadevula Kuppam, Avulapalli,  
Peddauppara Palli (P),  
Somala, Chittoor, AP-517 257,  
Mobile : 9908309135.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**36 G. Subramanyam Naidu,**

Age: 54,S/o. Srinivasulu Naidu,  
Nagillavari Palli,  
Peddauppara Palli (P),  
Somala, Chittoor, AP-517 257,  
Mobile : 9581629108.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**37 Kankanala Muneswar Naidu,**

Age : 73, S/o. K. Subbaiah Naidu,  
Nagillavari Palli,  
Peddauppara Palli (P),  
Somala, Chittoor, AP-517 257,  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**38 Bandlapalli Munaswamy,**

Aged: 66, S/o. B. Mallaiah,  
Rampalli, Avulapalli,



Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

Patra Palli (P),  
Somala, Chittoor, AP-517 257,  
Mobile : 9676213342.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**39 Sompalli Venugopal Naidu,**  
aged 67, S/o. S. Lakshmaiah Naidu,  
Chinnadevula Kuppam, Avulapalli,  
Peddauppara Palli (P),  
Somala, Chittoor, AP-517 257,  
Mobile : 9550040569.  
[sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**40 Mrs. Bathula Kamalamma,**  
Age: 64, W/o. B. Gangulappa,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 8978365863. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

**41 Bathula Gangulappa,**  
Age: 69, S/o. B. Venkataswami,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 8978365863. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

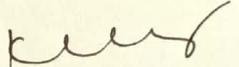
**42 Bathula Sreenivasulu,**  
Age: 33, S/o. B. Venkataramana,  
Bayyareddy Palli, Avulapalli,  
Peddauppara Palli (P), Somala,  
Chittoor, AP -517 257,  
Mobile: 8978365863. Mail: [sfavpbr@gmail.com](mailto:sfavpbr@gmail.com)

.....APPLICANTS

VS-

**1 Union of India,**  
Represented by its Secretary,  
Union Ministry of Environment, Forest & CC  
Indira Paryavaran Bhavan, Jorbagh,  
New Delhi - 110003  
Mail: [secy-moef@nic.in](mailto:secy-moef@nic.in)  
Phone No: 011-24695262, 24695265.

**2 Union of India,**  
Represented by its Secretary,  
Ministry of Jalshakti,

  
Special Chief Secretary to Govt  
Water Resources Department  
A.P. Secretariat, Amaravathi

Sharm Shakti Bhavan,  
New Delhi 110001  
Mail: [secy-mowr@nic.in](mailto:secy-mowr@nic.in)  
Phone No: 011-24695262, 24695265

**3 STATE OF ANDHRA PRADESH**

Represented by its Chief Secretary,  
Secretariat, Velagapudi,  
Guntur District,  
Andhra Pradesh - 522503  
Email: [cs@ap.gov.in](mailto:cs@ap.gov.in)  
Phone No: 863244461.

**4 District Collector**

Chittoor District  
New Collectorate Complex,  
Chittoor, Andhra Pradesh-517002,  
Mail: [collectorchittoor@gmail.com](mailto:collectorchittoor@gmail.com)  
Phone No: 08572240333.

**5 Krishna River Management Board,**

Represented by its Member Secretary,  
Govt. of India, Ministry of Water Resources,  
5<sup>th</sup> Floor, Jalasoudha,  
ErrumManzil,  
Hyderabad - 500082.  
Mail: [membersecretary-krmb@gov.in](mailto:membersecretary-krmb@gov.in)  
Phone No: 040 -23301858

**6 Central Water Commission,**

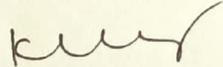
Represented by its Chairman,  
313, S, SewaBhavan,  
Sector 1, Ramakrishnapuram,  
New Delhi - 110066,  
Mail: [chairman\\_cwc@nic.in](mailto:chairman_cwc@nic.in),  
Phone No: 01126187232.

**7 Chief Engineer,**

NTR Telugu Ganga Project,  
Opp. S.V. Medical College, Old Alipiri,  
Tirupati, Chittoor Dist.517 507,  
Mail: [cetgpskht@yahoo.co.in](mailto:cetgpskht@yahoo.co.in)  
Mobile: 9440903871/08772220974.

**8 N. Jayamma,**

age: 49, W/o. Mr. N. Vankatswami,  
No.6-112, Peddaupparpalli,

  
Special Chief Secretary to Govt  
Water Resources Department  
A.P. Secretariat, Amaravathi

Somala, Chittoor District,  
Andhra Pradesh-517 257.  
Mobile: 9959056546.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**9 P. Krishnapa,**

Aged 60, S/o. Mr. P. Chinnappa,  
No.9-9, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 8106864564.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**10 P. Chandra Raju,**

Aged 60, S/o. Mr. P. Chinna Nagaraju,  
No.8-98, No.9-9, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 9640298037.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**11 G. Venkatramana,**

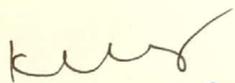
Age: 55, S/o. Mr. G. Ramachandraaiah,  
No.9/39, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 7287821317.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**12 C.P. Krishnaiah,**

Aged 75, S/o. Mr. C.P. Gangulappa,  
No.9/51/2, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 7898031268.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**13 D. Shankaraiah,**

Aged 55, S/o. Mr. D. Venkatannaboyudu,  
No.80-94, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 9000325598..  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

**14 D. Subrahmanyam,**

Aged: 37,S/o. Mr. D. Venkataswamy,  
No.9-34A, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 7702830305.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**15 S. Madhava Raju,**

Aged 60, S/o. Mr. S. Gopal Raju,  
No.9-2, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 7702824670.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**16 P. Gangaiah,**

Aged 70,S/o. Mr. P. Chinnabba,  
No.9-10, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 8106842219.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**17 P. Subramanyam Raju,**

Aged: 53,S/o. late: Mr. P. Chinna Nagaraju,  
No.11-565, Parvathi Nagar,  
Rajiv Nagar Panchayathi,  
Tirupati (Urban), Tirupati,  
Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 8897214559.  
Email. : [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**18 C.G. Chinna Reddy,**

Aged 49 years,S/o. Mr. C.G. Sreeramulu Reddy,  
No.9-56A, Bayyareddi Palli, Avulapalle,  
Peddappara Palle,  
Chittoor, AP -517 257,  
Mobile: 7893434824.  
Email. : [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**19 D. Peddabba,**

Aged 73, S/o. Mr. D. Venkata Boidu,  
No.8-92, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

Andhra Pradesh-517 257,  
Mobile: 9177467001.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**20 C.P. Haribabu,**

Aged 42, S/o. Mr. C.P. Krishnaiah,  
No.9-5A, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 7780515489.  
Email: [gautamraman@gmail.com](mailto:gautamraman@gmail.com)

**21 D. Venkatappa,**

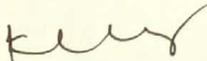
Aged 52, S/o. D. Ramaiah,  
No.8-92, Ramakrishnapuram,  
Avulapalle, Somala, Chittoor District,  
Andhra Pradesh-517 257,  
Mobile: 9704070599.

..... **Respondents**

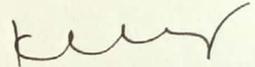
**ADDITIONAL COUNTER AFFIDAVIT FILED ON BEHALF OF  
RESPONDENTS NO. 3 &4**

I, Dr. K.S Jawahar Reddy, S/o Late. K.S Eswar Reddy, aged about 57 years, Occ: Special Chief Secretary, Water Resources Department, Government of Andhra Pradesh, R/o Vijayawada, do hereby solemnly affirm and sincerely state on oath as follows:

1. I am the Secretary, Water Resources Department to the Government of Andhra Pradesh and I am well acquainted with the facts of the case. I am authorised to depose on behalf of the 3<sup>rd</sup> and 4<sup>th</sup> Respondents.
2. It is submitted that the present affidavit is necessitated to bring about the inapplicability of the reliance of the Original applicant to the earlier orders passed by the Hon'ble Tribunal.

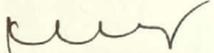
  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

3. It is submitted that the present case pertains to supply of drinking water to the upland severe drought prone areas of Chittoor District. For the purpose of present litigation, two projects undertaken by the State of Andhra Pradesh are alone relevant. These projects are called Galeru Nagari Sujala Savanthi (GNSS) and Handri Niva Sujala Sravanthi (HNSS), for which Environmental Clearances were already accorded by the MOEF.
4. It is respectfully submitted that these projects are gravity and lift irrigation projects respectively, and envisage lifting of surplus flood water from river Krishna for providing irrigation facilities to 3,49,000 hectares of area (both projects ) and to cater drinking water facilities to 43 Lakh population, in the drought affected areas of four number of Districts in Andhra Pradesh including Chittoor. These projects also envisage construction of Main canal and also Reservoirs.
5. It is submitted that the said projects intend drawing of water from a common source i.e., Srisailam Reservoir. The quantum of water to be drawn from Srisailam reservoir is fixed for the purposes of these two projects. A pictorial depiction stroke of flowchart showing the phase manner in which the project has been carried out hitherto is annexed hereto as **Annexure -A**.

  
Special Chief Secretary to Govt  
Water Resources Department  
A.P. Secretariat, Amaravathi

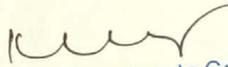
6. It is submitted that at this stage it is relevant to point out that the quantum of water in Srisailam Reservoir is filled up through various means and channels i.e., through natural flows of river, flood water and rain water. In the recent time, one scheme namely Rayalaseema Lift Scheme a new Lift Scheme, is being proposed in the foreshore of Srisailam Reservoir, depending up on the flood waters of Krishna as well as inflows from self catchment, to cater the needs of various canals. It is pertinent to mention here that the GNSS and HNSS projects are independently in operation and functioning from foreshore of Srisailam Reservoir well before the initiation of Rayalaseema Lift Scheme without any dependency on Rayalaseema Lift Scheme.

Unlike Rayalaseema Lift Scheme the proposed inter linked GNSS – HNSS Lift irrigation scheme takes off from GNSS Canal system depending not only on the flood waters of River Krishna but also on the inflows received from self catchment of River Penna. Hence, it is tangible that GNSS – HNSS Lift irrigation scheme is not reliance of Rayalaseema Lift Scheme and is not linked. This scheme is formulated chiefly to provide drinking water facilities to the tail end areas of HNSS project which are severe drought prone in Chittoor District to fulfill the scope and aim of HNSS project and as specified in the

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

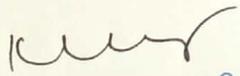
environmental clearance given by MOEF to HNSS project. This scheme utilizes the surplus flood water of River Krishna from GNSS main canal and also contemplates to lift water by restricting 38 TMC of water from Srisaillam Reservoir, for which Environmental Clearance is already accorded and it is a part of approved Projects of GNSS and HNSS to fulfill the drinking water needs of drought prone areas of Chittoor district, as covered in the approved Environmental Clearances. Hence there is no modification in the scope of both approved GNSS and HNSS projects. As such, the matter of record that an Original Application No. 71 of 2020 was filed by one Gavinolla Srinivas in which validity of Rayalaseema Lift Scheme was questioned on the ground that such water pumping schemes should be mandatorily allowed only with the prior Environmental Clearance, **is not applicable to the proposed GNSS-HNSS Lift Irrigation Scheme.**

7. It is submitted that the applicant in the present case is trying to induce the thought that judgment of OA No. 71 of 2020 is applicable on the sole ground that the source of both the GNSS and HNSS projects and Rayalaseema Lift scheme is Srisaillam Reservoir. As a matter of fact GNSS & HNSS projects are functioning independently well before the formulation of Rayalaseema Lift scheme without any dependency on it. The GNSS-HNSS Lift Irrigation Scheme is

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

proposed to utilize the self catchment inflows of Penna basin in addition to flood waters of Srisaillam Reservoir. **Further, it is submitted that GNSS-HNSS Lift Irrigation Scheme is not dependent upon the Rayalaseema Lift Scheme.** The GNSS-HNSS Lift Irrigation Scheme is not linked with Rayalaseema lift scheme and can function even without the existence of Rayalaseema Lift scheme. Hence, it is to state that there would be no comparison between Rayalaseema Lift Scheme with the GNSS-HNSS Lift Irrigation Scheme.

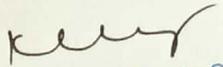
8. It is respectfully submitted that, it is not in dispute that the Chittoor district is located at a higher elevation and identified as a severe drought affected area, which is in dire necessity of drinking water. In order to protect the drinking water needs of the tail end areas of HNSS i.e., five lakh people in six mandals of Chittoor district in an effective manner, it is felt essential to improve three reservoirs namely (i) Nethiguntavaripalli (ii) Mudivedu and (iii) Avulapalli Reservoirs to store water in the flood season and to utilize same for the rest of the period, which is in the scope of approved Environmental Clearance given by MOEF to the HNSS project. The said three reservoirs are initially existing MI tanks and improvements are being now proposed. As such, the said three reservoirs are not the new reservoirs but a part of irrigation planning to link canals to the existing tanks to cater the drinking water needs.

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

9. It is respectfully submitted that, the proposed three reservoirs are covered under the distributory network of the contemplated scope of the HNSS project under the sub component '**Drinking water**', for which MOEF has already accorded Environmental Clearance. For this purpose no extra water and ayacut is being proposed and there is no change in scope of HNSS project. **Hence there is no necessity of fresh appraisal, as stated in Clause (6) of Part (B) General Conditions of Environmental Clearance.**

10. It is submitted that the scope of approved Projects i.e., GNSS and HNSS, intends to supply drinking water to 43 Lakh population spread over in the drought prone areas of 4 districts which is not being fulfilled even to a small extent. The tail end areas of HNSS Scheme i.e., Chittoor district are not being provided with drinking water and as the GNSS Canal system is relatively at a lower elevation than that of HNSS, the Government accorded approval to divert 2000 cusecs of water from GNSS Main Canal to HNSS Main Canal by means of closed 'Pressure conduits', without having any impact on environment. Further, it is to submit that the components of work involved in GNSS-HNSS Lift Irrigation Scheme are similar to the components involved in the approved GNSS & HNSS projects, for which EC was already accorded such as ,

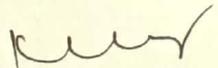
- a. Construction of lifts
- b. Construction of canals/ reservoirs
- c. Construction of tunnels etc.,

  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

11. It is submitted that the purpose of the proposed diversion and improvements to 3 reservoirs, does not involve any new activity & without any modification from original scope of GNSS & HNSS projects. Also construction of this scheme is not detrimental to the environment and there would be no impact on the environment, hence environment friendly. The following may kindly be noted.

- a. The quantum of water allocated cumulatively under both the GNSS & HNSS projects does not alter.
- b. The purpose for which these projects were undertaken also does not have any effect but instead will be full filled.
- c. The diversion of water is being used only for the purpose of drinking water in the first phase, to the tail end drought prone areas of Chittoor District, to avoid migration of People, in the welfare of humanity. After completion of distributory system, the irrigation needs will be fulfilled under second phase.
- d. It is undertaken that if this diverted water if used for any other purposes other than drinking, under second phase if necessary, relevant permissions including EC shall invariably will be applied accordingly.

12. In view of the above, it is respectfully submitted that reliance on the earlier orders is completely mistaken and is only done to create a prejudice and that too, for personal interest of applicant. It is submitted that the projects undertaken by the

  
Special Chief Secretary to Govt  
Water Resources Department  
A.P. Secretariat, Amaravathi

Govt. of Andhra Pradesh are purely meant in Public interest and relate to basic needs of supply of drinking water to the drought affected tail end areas of Chittoor District. Further, it is respectfully submitted that there would be no change in scope against the approved EC accorded by the MOEF.

13. It is submitted that this respondent craves leave of this Hon'ble Tribunal to raise additional counter in the course of proceedings, if required. In the above circumstances, it is humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the above Original Application No.137 of 2021 and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.



**Deponent**

Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravati

Solemnly affirmed at Vijayawada  
Andhra Pradesh on this the 7<sup>th</sup> day  
of February 2022 and signed his name  
in my presence.

**BEFORE ME**



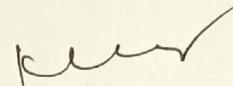
**ADVOCATE**

**PENUMAKA AJAY BABU**  
ADVOCATE M.A.,L.L.M.,  
HIGH COURT OF A.P.  
CELL: 9493494444, 9966370959

**VERIFICATION**

I, Dr. K.S Jawahar Reddy, S/o Late. K.S Eswar Reddy, aged about 57 years, Occ: Special Chief Secretary, Water Resources Department, Government of Andhra Pradesh, R/o Vijayawada, do hereby verify that the contents of Paras of Counter Affidavit are based on record and information are true to the best of my knowledge and belief.

Hence, verified on the day 7<sup>th</sup> of February 2022 at Vijayawada



**Deponent**  
Special Chief Secretary to Govt.  
Water Resources Department  
A.P. Secretariat, Amaravathi

# FLOW DIAGRAM SHOWING THE H.N.S.S & G.N.S.S PROJECTS

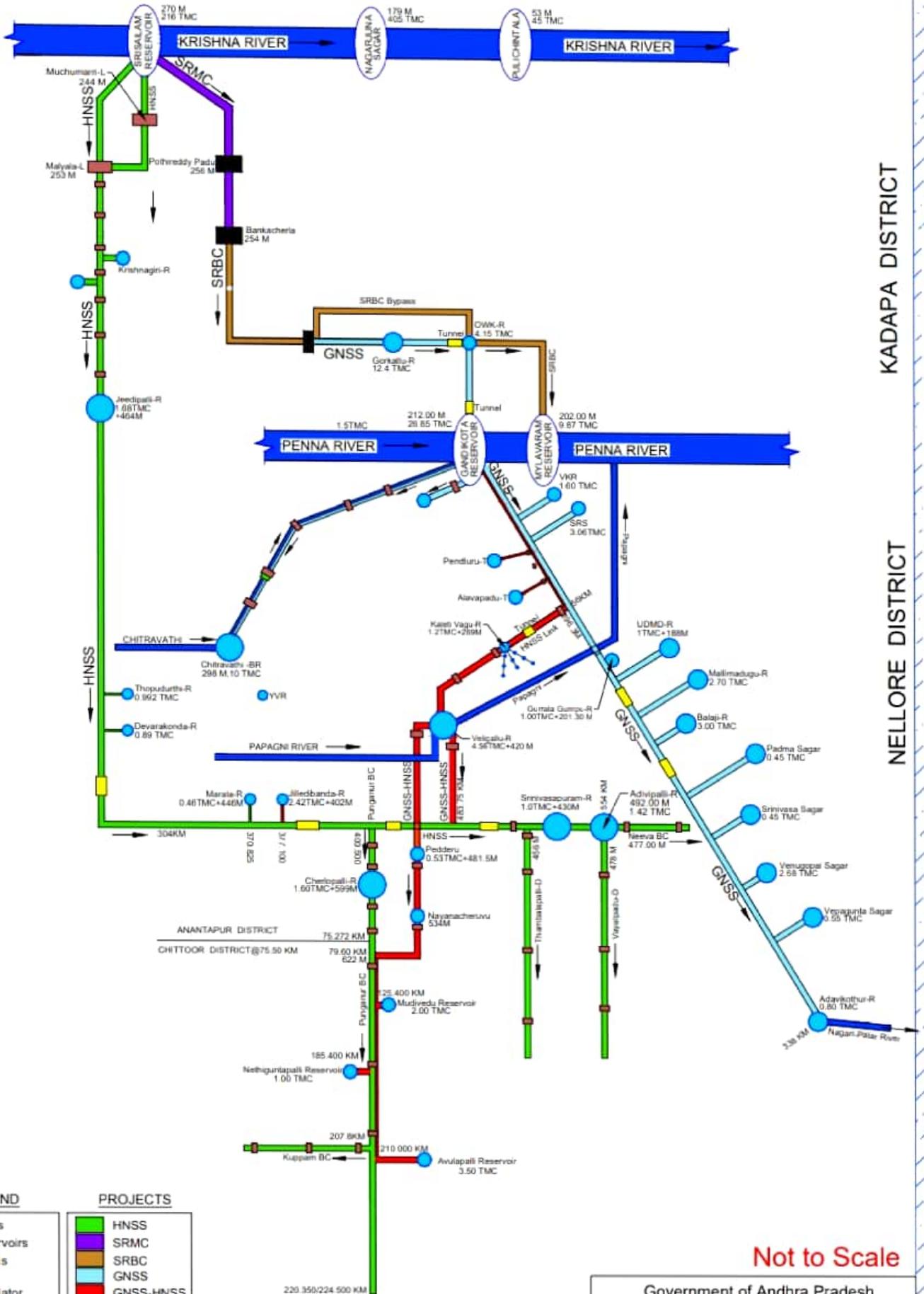
KARNATAKA

KADAPA DISTRICT

NELLORE DISTRICT

BAY OF BENGAL

ANANTAPUR DISTRICT



**LEGEND**

- █ Rivers
- █ Reservoirs
- █ Canals
- █ Lifts
- █ Regulator
- █ Barrage/Anicut
- █ Tunnels

**PROJECTS**

- █ HNSS
- █ SRMC
- █ SRBC
- █ GNSS
- █ GNSS-HNSS LINK CANAL

Not to Scale

Government of Andhra Pradesh  
Water Resources Department  
CHIEF ENGINEER, NTR-TGP, TIRUPATI

CHITTOOR DISTRICT