

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN BENCH AT CHENNAI
Appeal No.18 of 2020**

IN THE MATTER OF:

SrideviDatla
W/o. DRSS Kumar Varma
R/o Door No.10-37-11
Ramnagar, Visakhapatnam - 530002
Andhra Pradesh.

... APPLICANT

VERSUS

1. Union of India
Through the Secretary
Ministry of Environment Forest
and Climate Change and 4 others

... RESPONDENTS

**ADDITIONAL COUNTER AFFIDAVIT FILED BY THE
RESPONDENT NO. 2, STATE OF ANDHRA PRADESH**

Date-25-08-2021



**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 RESPONDENTS 2 TO 4**

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- 1. Union of India**
Through the Secretary
Ministry of Environment Forest
and Climate Change
Indira Paryavaran Bhawan,
JorBagh, New Delhi – 110003
- 2. State of Andhra Pradesh**
Through the Chief Secretary
Secretariat Buildings
Hyderabad.
- 3. Andhra Pradesh Pollution Control Board**
Through the Member Secretary
D.No.33-26-14/D2, Near Sunrise Hospital
Pushpa Hotel Center, Chalamvari Street,
Kasturibaipet, Vijayawada – 520008.
- 4. The M/s.Bhogapuram International
Airport Corporation Ltd.,**
Through the Managing Director
1st Floor, FDC Complex
AC Guards, Hyderabad – 500 028.
- 5. GMR Visakhapatnam International Airports Limited**
Through Authorised Signatory
Mr. Manomay Rai, Registered Office
10-1-43, Flat No.202, Second Floor
Siripuram Fort, Siripuram
Visakhapatnam – 530 003.
Andhra Pradesh

... RESPONDENTS


R. KARIKAL VALAVEN, I.A.S.,
Special Chief Secretary to Government
Infrastructure & Investment Department

ADDITIONAL COUNTER AFFIDAVIT FILED BY THE
RESPONDENT NO. 2, STATE OF ANDHRA PRADESH

I, R. Karikal Valaven, I.A.S. S/o Sri C. Rama Krishnan, Aged 58 years, Special Chief Secretary to Government of Andhra Pradesh and Respondent No.2 do hereby solemnly affirm and submit as follows.

1. I am the Special Chief Secretary to the Government of Andhra Pradesh and I am filing this Affidavit on behalf of 2nd Respondent Chief Secretary to Government of Andhra Pradesh well acquainted with the facts of the case.

2. It is submitted that the Study of EIA had been undertaken and carried out in the year 2016. I state that since the year 2016 to August 2021, there have been several subsequent developments which are vital and relevant in so far as the water aspect is concerned in the present proceedings.

3. It is submitted that the present Affidavit deals with the subsequent developments *vis-a-vis* the current situation which are material and relevant in the present case, and hence, with the leave of this Hon'ble Tribunal are being placed on record.

4. It is submitted that the major sources of water in Vizianagaram District are Champavati, Gosthani and Nagarvalli Rivers along with other streams and Tributaries.


R. KARIKAL VALAVEN, I.A.S.,
Special Chief Secretary to Government

5. It is submitted that the current total estimated water demand of Vizianagaram District in 2021, is expected to be around 34 MLD.

6. It is submitted that apart from the above water sources, four reservoirs i.e. Thatipudi Reservoir, Nellimarla Reservoir are operating and Thotapalli Reservoir and Tharaka Rama Theertha Sagar Reservoir are under completion, which have already been mentioned in the earlier Additional Affidavit of Respondent No. 4 filed on 16.08.2021. Further, the work for augmenting the water supply from Gadigedda Reservoir is already in progress and under execution. Almost around 7 km pipeline in this regard has already been laid down and the remaining laying of the pipeline is in progress and ongoing.

7. It is submitted that in addition to the aforesaid, there is the Babu Jagjivan Ram Uttarandra Sujala Sravanthi Project, which is contemplated to lift 63.2 TMC of water from Polavaram left main canal to provide irrigation facilities to 8 lakh acres in the upland areas of Vishakhapatnam, Vijayanagar and Srikakulam District. I state that out of this 63.20 TMC, 53.40 TMC is meant for irrigating 8 lakh acres and 4.46 TMC for drinking water requirement for 30 lakh people. The requirement mentioned here is the projected requirement up to 2050. I further state that the said project is under execution stage and expected to be completed in 18 - 24 months' time.


R. KARIKAL VALAVEN, I.A.S.,
Special Chief Secretary to Government
Water Resources Department

8. It is submitted that the as a part of this project water is lifted in second stage and conveyed up to Gadigedda Reservoir in Vizianagaram district. Further, the monsoon season, for the area of Vizianagaram continues for October-November and the experience shows that all reservoirs achieve Full Reservoir Level (FRL) by February. The release of water from the reservoirs for agricultural purposes is generally from the month of June to November. The water stored in the reservoir is primarily allotted for drinking purposes being the priority area of allotment over and above the demand of agriculture.

9. It is submitted that there is sufficient amount of water available not only for release for Bhogapuram Airport but also for the Vizianagaram town and in any event of the matter as is seen from the aforesaid, supply of water to Bhogapuram International Airport will not have any impact whatsoever on either the municipal water supply or in the Vizianagaram District.

10. 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 Appeal No.18 of 2020 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.


R. KARIKAL VALAVEN, I.A.S.,
Chief Secretary to Government

Solemnly affirmed at Vijayawada
Andhra Pradesh on this the 25th
day of August , 2021 and signed
his name in presence

N. Karikal Valaven

BEFORE ME
R. KARIKAL VALAVEN, I.A.S.,
Special Chief Secretary to Government
Infrastructure & Investment Department
A.P. Secretariat, Velagapudi,
AMARAVATI - 522 238.

ADVOCATE, Vijayawada

VERIFICATION

I, R. Karikal Valaven , I.A.S. S/o Sri C. Rama krishnan, Aged 58
years, Special Chief Secretary to Government of Andhra Pradesh do
hereby state that what is stated above in paragraphs 1 to 10 are
true to the best of my knowledge and belief.

Dated at Vijayawada on this the 25th day of August 2021.

N. Karikal Valaven

DEPONENT
R. KARIKAL VALAVEN, I.A.S.,
Special Chief Secretary to Government
Infrastructure & Investment Department
A.P. Secretariat, Velagapudi,
AMARAVATI - 522 238.