

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, AT PUNE

ORIGINAL APPLICATION No. 89 OF 2020

IN THE MATTER OF:

SAMA SIDDIQ OSMAN

...APPLICANT

VERSUS

MINISTRY OF ENVIRONMENT, FOREST &
CLIMATE CHANGE & ORS.

...RESPONDENTS

AFFIDAVIT ON BEHALF OF RESPONDENT No. 2 -

DISTRICT COLLECTOR, MORBI

I, Harshad Kishorshai Adharya....., adult, having my office at Taluka seva sadan, Lal baug, Morbi, in State of Gujarat hereby solemnly affirm and state on oath as under:

1. I am presently serving as Deputy Collector & SDM, Halvad I have read copy of the application and the orders passed by this Hon'ble Tribunal on the application on various dates. I am conversant with the facts of the case having perused the record pertaining to the case available in my office and am competent to make the present affidavit.
2. The application complains about adverse impact on the environment and the ecology of the area because of (i) grant by the government of its un-surveyed coastal land on lease to private parties for salt harvesting, and (ii) construction of bunds, destruction of mangroves and obstruction of free flow of tidal waters by the private parties who have been given the land on lease. The applicant asserts that the grant of lease by the State

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Government is illegal, in as much as the grant of lease has adversely impacted the ecosystem. The applicant then alleges that the lease holders have, without obtaining prior clearances, destroyed the mangroves, built bunds, stopped the outflow of water from the river and estuaries and interfered with the inter-tidal flow of water, thereby violating the environmental laws and in particular the Coastal Regulation Zone Notification dated 18.01.2019.

Basing the case on assertions and allegations revolving around these two issues, the applicant has prayed for the following principal reliefs:

- “(a) Quash the orders granting leases in CRZ 1A area;
- (b) Issue directions to implement the directions issued by the Additional Chief Secretary, Environment Department dated 16.08.2019;
- (c) Direct respondent No. 7 and Respondent No. 9 to initiate legal action against R-4 and R-5 for building 28.52 sq km bund in the middle of Surajbari Creek and altering the creek system amounting to blatant CRZ violations in the ecologically sensitive CRZ-1A area;
- (d) Constitute an expert committee to determine the extent of damage to the coastal ecology by the salt companies and arrive at a prescriptive formula to assess compensation for loss of coastal ecology due to bunding and blocking of creeks (ex. per square meter / foot length of the bund) that can be applied to all such cases of bunding and blocking of creeks and mangroves destruction (Damage of mangroves per hectare for restitution of environment);
- (e) Issue direction to GPCB to initiate legal action against R-2 for allotting the CRZ-1A

category land to the salt companies and for preventing the course of justice by keeping the Joint Inspection pending till date without any reasonable cause or justification and despite the directions by the Additional Chief Secretary, Environment Department to cancel the leases with immediate effect. Further direct R-2 to pay part of the environment compensation from his salary."

GRANT OF LEASE

3. Separate applications were made by M/s Real Refined Salt & Allied Industries Limited and M/s Seaside Salt Private Limited to the Office of District Collector, Morbi for grant of un-surveyed in the coastal area for the purpose of salt manufacturing in the year 2018. Un-surveyed land are such lands for which the government has not conducted a proper legal designation of borders and has not registered the use and category of ownership for the land. Such land belongs to the government, and no private person can claim ownership over such land.
4. The application made by these private parties were examined by the Office of the District Collector, who is the custodian of all government lands falling within the territorial limits of the district. Noticing that the said land has not been previously allotted to any other party and is otherwise available for allotment, as also observing that the said land is suitable for making salt pans and carrying out activity of salt harvesting, the Office of the District Collector, Morbi recommended the proposal to the State Government.
5. The State Government independently examined the proposal, particularly in light of prevailing policy for allotting land on lease basis to private persons for salt work and salt harvesting. Being satisfied, the State Government decided to allot barren land in coastal area of Village Bagasara, Taluka Maliya, District Morbi on

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lease to the private parties. Accordingly, Government of Gujarat in its Revenue Department passed resolutions in the year 2019, resolving to allot government land admeasuring 1951 hectares to M/s Real Refined Salt & Allied Industries Limited and 902.48 hectares to M/s Sea Side Salt Private Limited for salt harvesting on lease for a period of 30 years.

6. The government resolution contained a directive to the District Collector, Morbi to execute the formal lease deed. Accordingly, a formal lease deed has been executed by the Office of the District Collector, Morbi with the respective private parties for the lands allotted to them. This indenture contains the terms and conditions governing the lease.

PERMISSIBILITY OF GRANT OF LEASE

7. The applicant has contended in the application that the grant of lease by the State Government is bad in law. The legal hypothesis put forward by the applicant is that it is not open or permissible for the State Government to grant lease of land falling within the Coastal Regulation Zone, particularly CRZ-1A area, for the purpose of salt harvesting.
8. There cannot be any debate on the legal proposition that all un-surveyed land belong to the government and that the government is free to deal with the barren or waste land in accordance with law. The only fetter on the power of the government is that the action of grant of government land should not be in violation of any declared state policy, prescribed procedure, or any other provisions of law.

ABSENCE OF LEGAL RESTRICTION

9. The applicant, in the entire memo of petition, has not highlighted any legal bar on the State Government from granting, by way of lease or otherwise, any surveyed or un-surveyed government

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land, even if such land is falling within the area of Coastal Regulation Zone.

- 9a. The applicant has not pointed out, either in the memo of application or even during oral arguments, any statutory provision putting an absolute embargo on the State Government from making allotment of government baren or waste land, if such land is situated in Coastal Regulation Zone. I assert that there is no excluding provision contained in any statute.
- 9b. The applicant has not spelt out any such bar as contained in the Coastal Regulation Zone Notification dated 6.01.2011 or 18.01.2019 issued by the Government of India.
- 9c. In absence of there being any legal restriction on grant of any government land, including land falling with the Coastal Regulation Zone area, there exists no legal restraint on the power of the State Government to make allotment of land, on lease or otherwise, to a private person for a specified purpose.
10. The applicant has not alleged, even cursorily, that the grant of coastal land on lease basis to the private parties herein is not in consonance with the declared policy of the government on the subject or that the defined procedure for making allotment of land has not been followed in the instant case.
11. Except a bald statement that the grant of coastal land by the State Government falls foul of law, nothing has been stated by the applicant to substantiate the said contention. I submit that the contention of the application lacks is bereft of any legal basis and deserves to be rejected by this Hon'ble Tribunal.

ABSENCE OF JURISDICTION TO REVIEW LEASE

12. The propriety of action of the State Government in granting lease of the un-surveyed land, which undoubtedly belongs to the State

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Government, cannot be questioned in proceedings before this Hon'ble Tribunal.

13. The National Green Tribunal Act, 2010 confers upon this Hon'ble Tribunal jurisdiction to hear and adjudicate all 'civil cases where a substantial question relating to environment (including enforcement of any legal right relating to environment) is involved and such question arises out of the implementation of the enactments specified in Schedule I'. Schedule I enumerates the following Acts:

- (i) Water (Prevention and Control of Pollution) Act, 1974;
- (ii) Water (Prevention and Control of Pollution) Cess Act, 1977;
- (iii) Forest (Conservation) Act, 1980;
- (iv) Air (Prevention and Control of Pollution) Act, 1981;
- (v) Environment (Protection) Act, 1986;
- (vi) Public Liability Insurance Act, 1991;
- (vii) Biological Diversity Act, 2002.

Undoubtedly, the Hon'ble Tribunal has wide jurisdiction in all cases involving violation of provisions of environmental laws; however, the jurisdiction would not extend to examining the legality, propriety and correctness of government action which does not violate any provisions of environmental laws.

14. The application does not indicate, much less with reasonable specificity, any provision contained in any of the abovementioned Acts prohibiting or restricting the State Government from granting, by way of lease or otherwise, any surveyed or un-surveyed government land, even if such land is falling within the area of Coastal Regulation Zone. The applicant, in the entire memo of application, has not alluded to any prohibitive or even restrictive clause contained in the Coastal Regulation Zone Notification dated 6.01.2011 or 18.01.2019 issued by the Government of India. I assert that the grant of waste / barren / government land is regulated by the policy framed in this behalf by the State Government and that exercise of discretion by the State Government of making allotment under such policy does not offend or fall foul of any provision contained in any of the above

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mentioned 07 Acts, thereby clothing this Hon'ble Tribunal with jurisdiction to hear and adjudicate the issue of permissibility and/or propriety of grant of lease in coastal area within the territorial limits of the State.

15. In absence of there being any legal restriction on grant of any government land, including land falling within the Coastal Regulation Zone area, no legal right is available to the applicant, which is sought to be enforced by way of present proceeding. Except bogus claims of violation of environmental laws by the action of grant of land simpliciter, the applicant has not been able to advance any legal submission justifying invocation of jurisdiction of this Hon'ble Court on the aspect on the challenge to the grant of lease. The application to the extent it calls for examination of the right of the State Government to make allotment of coastal land for salt harvesting as also propriety of the grant of lease to the private respondents by this Hon'ble Tribunal in the present proceeding is thoroughly misconceived and not tenable in the eye of law.

ABSENCE OF DIRECTION IN COMMUNICATION DATED 16.08.2019

16. The applicant has contended that it was obligatory for the District Collector, Morbi to cancel the lease, ordered to be allotted by the State Government, in light of the direction given "by the Additional Chief Secretary, Environment Department dated 16.08.2019". The applicant has not placed on record any communication dated 16.08.2019 authored by the Additional Chief Secretary, Government of Gujarat. I state that there exists no such communication. The applicant seems to be possibly making a reference to communication dated 16.08.2019 addressed by Deputy Director (CRZ) in the Ministry of Environment, Forest and Climate Change, Government of India. This letter is annexed at page 81 of the application. The letter is addressed to the Member Secretary, Gujarat Coastal Zone Management Authority. The communication mentions about receipt of complaint by the

Ministry from the applicant alleging "large scale destruction of Mangrove forest, Mudflats, river, Estuaries by salt lease holder companies in illegally allotted area by Revenue department of Gujarat" and requests examination of the said complaint by the Gujarat Zone Coastal Management Authority, which is the statutory authority entrusted with the duty of protecting the coastal regulation zones. The letter does not contain any direction, much less a direction to cancel the lease.

17. The reliance being placed by the applicant on this communication for the purpose of seeking cancellation of the lease granted by the State Government is totally misplaced. As a corollary, the prayer for cancellation of lease on the basis of this communication lacks merit and deserves rejection by this Hon'ble Court.

OBJECTION BY DEENDAYAL PORT AUTHORITY

18. The applicant has stated that the Deendayal Port Authority had objected to the grant of land on lease to the private parties. It is pertinent to mention here that Deendayal Port Authority has not laid any challenge to the non-consideration of its objection or the subsequent decision of the State Government to grant un-surveyed coastal land on lease to the private parties. Further, Deendayal Port Authority does not appear to have authorised the applicant to espouse the cause of the Authority. If the Authority feels aggrieved by any action of the State Government, including the action of granting on lease to private parties any coastal land for salt harvesting, it would always be open to the Deendayal Port Authority to challenge the same in accordance with law. As and when such challenge is made by the Deendayal Port Authority, the same shall be suitably defended by the government.
19. An attempt on the part of the applicant to piggy-back on the objection raised by the Deendayal Port Authority to the grant of lease of coastal land is self-defeating. Deendayal Port Authority had objected to the grant of lease not on the ground of it being

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impermissible to make allotment of land in Coastal Regulation Zone area, but because the said area of land was previously allotted to it. There is an implicit recognition in the objection raised by Deendayal Port Authority about permissibility to given away coastal land, including one falling in the Coastal Regulation Zone, by the government.

IDENTIFICATION & MAPPING OF LEASED LAND

18. The Office of the District Inspector of Land Records, Morbi and Kutch have jointly carried out the exercise of identifying the area of 1951 hectares leased to M/s Real Refined Salt & Allied Industries Limited and area of 902.48 hectares leased to M/s Sea Side Salt Private Limited.
19. The present application pertains to the legality of grant of land on lease to the private parties. The applicant has not prayed for examining the legality of the grant of land on the ground that the leased land belongs to the Deendayal Port Authority and therefore the State Government had no authority in law to make allotment of such land on lease to the private parties for salt harvesting.
20. Nevertheless, a strange contention was raised by Deendayal Port Authority – as a respondent in the proceeding, during the course of hearing of the present application that the area of land leased by the State Government to the private respondents herein belongs to the Authority and therefore issue of ownership shall have to be settled between the parties. Such submission was wholly outside the scope and ambit of the petition.
21. The local administration, at all times, was confined to identifying the boundary limits of the land leased by the State Government to the private respondents herein for salt harvesting. However, insistence was made on the part of the Deendayal Port Authority to have their area of land be measured and demarcated by the local administration. As the request by Deendayal Port Authority was

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beyond the scope of the present proceeding, the said request was not accepted by the local administration. However, every attempt was made by the local administration to involve the Deendayal Port Authority in carrying out the exercise of demarcating the area of leased land. It is because of continuous raising of objections by the Deendayal Port Authority, coupled with the fact that some of the area under survey was affected by cyclone and torrential rains, some delay occasioned in completing the survey. Also, the enormity of the area under survey also consumed additional time for completing the assigned work. Additionally, the search and availability of record from the year 1955 onwards contributed to the delay. I submit that the delay was not deliberate or intended to defeat the orders of the Hon'ble Tribunal. I tender apology for the unintentional delay.

22. Today, the survey has been completed. The entire area of land leased to both the private respondents has been visited, identified and demarcated by the Office of the District Inspector of Land Records, Morbi.
- 22.1 The entire area of 1951 hectares leased to M/s Real Refined Salt & Allied Industries Limited and area of 902.48 hectares leased to M/s Sea Side Salt Private Limited is found situated within the limits of Morbi district.
- 22.2 The entire area of leased land is found to be within the notified port area limit of Navlakhi Port.
- 22.3 A claim was made during the conducting of survey and measurement by the Deendayal Port Authority that the area of leased lands actually falls within the limits of notified area of Deendayal Port Authority. Despite grant of reasonable opportunity, the officials of the Deendayal Port Authority could not produce any documentary material before the District Inspector of

Land Records showing or suggesting that any portion of the leased area falls within the limits of their notified area.

22.4 District Inspector of Land Records has informed that there appears to be overlapping of some area between the Navalakhi Port and Deendayal Port Authority. This overlapping is noticeable on superimposing the co-ordinate map of Navlakhi Port (Gazette Notification dated 21.11.1955) and co-ordinate map of Deendayal Port Authority (Gazette Notification of 1970). Also noticeable is overlapping of some area forming part of the Cher Reserved Forest and Deendayal Port Authority. Some portion of the leased land falls in the overlapping area between Navlakhi Port and Deendayal Port Authority; however, no area of leased land falls within the Cher Reserved Forest or the area overlapping between Cher Reserved Forest and Deendayal Port Authority.

23. A copy of the map sheet showing the area of land leased to both the private respondents is annexed herewith and marked as **Annexure R-1.**

SUPERIMPOSITION ON APPROVED CZMP

24. The leased area or the area under reference was superimposed on the approved Coastal Zone Management Plan of the area (GJ 203, GJ 204, GJ 219 and GJ 220) prepared by National Center for Sustainable Coastal Management, Chennai as per Coastal Regulation Zone Notification, 2011.

25. Based on analysis, it is observed that sizeable area of land leased to Seaside Salt Private Limited falls in CRZ-1 (A) area – areas that are ecologically sensitive. As against that, only a marginal area of about 3-4% of the total area leased to Real Refined Salt & Allied Industries Private Limited falls in CRZ-1 (A) area. A copy of the approved Coastal Zone Management Plan for the reference area with superimposition of the boundary of the leased land is annexed herewith and marked as **Annexure R-2 (colly.)**.

26. The approved maps with superimposition of the leased area together with the analysis shall be submitted by the Office of the District Collector, Morbi to the District Level Coastal Regulation Zone Committee and the Gujarat State Coastal Zone Management Authority for consideration while scrutinising and appraising the proposal of both the private respondents herein for grant of CRZ clearance for performing salt harvesting and salt works activity.

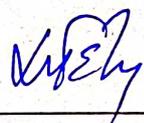
CONCLUSION

27. The Office of the District Collector, Morbi assures to extend all possible cooperation to the other statutory authorities in discharge of their official duty, and shall abide by all reasonable directions as may be issued by the Hon'ble Tribunal in the present proceeding.

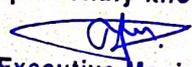

 (Harshdeep Kishorobhai Acharya)
 DEPONENT

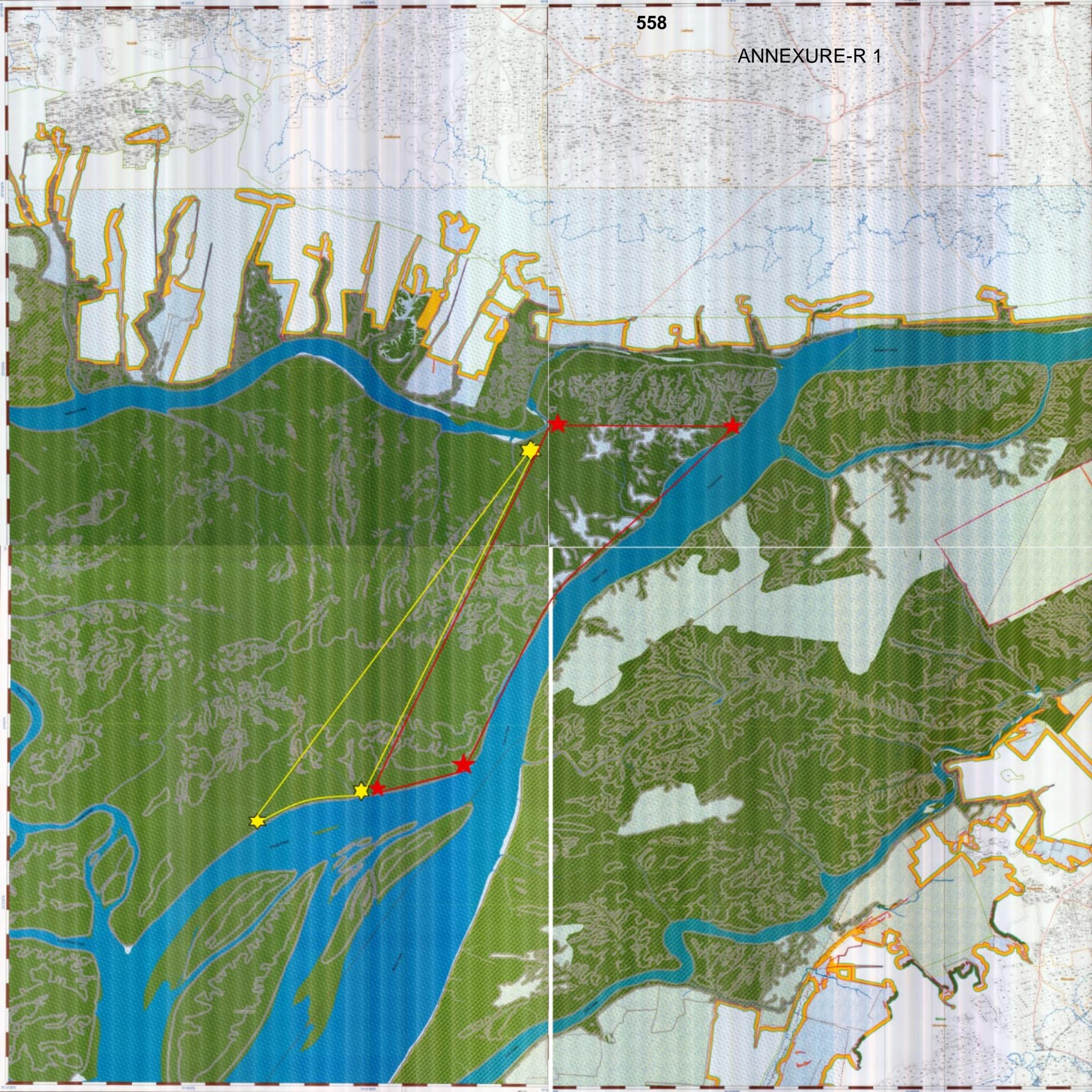
VERIFICATION

Verified at Morbi..... on this 15th day of August, 2023 that the contents of the above affidavit are true and correct, nothing stated therein is false and nothing material has been concealed therefrom.


 (Harshdeep Kishorobhai Acharya)
 DEPONENT

Solemnly affirmed before me
 by H.K. Acharya
 who is identified before me
 by Self (P.M. Nayakpan)
 Whom I personally know


 Executive Magistrate
 Morbi.



Legend

- Lighthouse
- Port
- Fishing Harbours
- Fish Landing Centre
- Road
- Railway Line
- Bund
- High Tide Line
- Low Tide Line
- Municipal/Other Urban Areas
- Village Boundary
- Taluk Boundary
- State Boundary
- Survey Plots
- Port Limit
- Ecologically Sensitive Zone
- Breakwater or Jetty
- Diversion of Reserved Forest

CRZ Lines & Boundary

- Hazard Line
 - 100 m Line in CRZ III Area
 - 200 m CRZ Line - NDZ
 - CVCA Boundary
 - Sand Dune Beyond CRZ Boundary
 - CRZ Boundary
- (500m Line, 100m for Bay, 100 m or width of the creek whichever is less along the tidal influenced water bodies)

CRZ CATEGORY

- CRZ - I**
- CRZ - IA
 - 50 m Mangrove Buffer Zone - CRZ IA
 - CRZ - IB
- CRZ - II**
- CRZ - II
- CRZ - III**
- No Development Zone
 - 200 to 500 m from HTL
- CRZ - IV**
- CRZ - IVA
 - CRZ - IVB

DATA SOURCE

- I) National Center for Sustainable Coastal Management
 - 1) HTL, LTL, 2) CVCA, 3) CRZ Lines,
 - 4) CRZ - IA
 - 5) Infrastructure facilities such as Lighthouse, Breakwater or Jetty
- II) Survey of India
 - 1) Hazard Line
- III) Gujarat State Coastal Zone Management Authority
 - 1) Administrative Boundaries, 2) Infrastructure facilities such as Fish Landing Centre, Fishing Harbour,
 - 3) Ecologically Sensitive Zone etc

ABBREVIATIONS

- CRZ : Coastal Regulation Zone
- NDZ : No Development Zone
- CVCA : Critically Vulnerable Coastal Areas



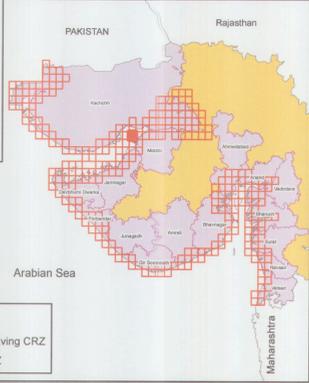
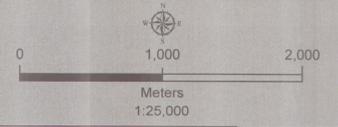
ANNEXURE R - 2(COLLY.)

COASTAL ZONE MANAGEMENT PLAN
GUJARAT

Sheet No: F 42 E 8/SE

Projection :- UTM Datum :- WGS 1984

Map No. : GJ 203



Legend
 Coastal Districts Having CRZ
 Districts Out of CRZ

Legend

- Lighthouse
 - Port
 - Fishing Harbours
 - Fish Landing Centre
 - Road
 - Railway Line
 - Bund
 - High Tide Line
 - Low Tide Line
 - Municipal/Other Urban Areas
 - Village Boundary
 - Taluk Boundary
 - State Boundary
 - Survey Plots
 - Port Limit
 - Ecologically Sensitive Zone
 - Breakwater or Jetty
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- CRZ Lines & Boundary**
- Hazard Line
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- CRZ - II**
- CRZ - II
- CRZ - III**
- No Development Zone
 - 200 to 500 m from HTL
- CRZ - IV**
- CRZ - IVA
 - CRZ - IVB

DATA SOURCE

I) National Center for Sustainable Coastal Management
 1) HTL, LTL, 2) CVCA, 3) CRZ Lines
 4) CRZ - IA
 5) Infrastructure facilities such as Lighthouse, Breakwater or Jetty

II) Survey of India
 1) Hazard Line

III) Gujarat State Coastal Zone Management Authority
 1) Administrative Boundaries, 2) Infrastructure facilities such as Fish Landing Centre, Fishing Harbour, 3) Ecologically Sensitive Zone etc

ABBREVIATIONS

CRZ : Coastal Regulation Zone
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 CVCA : Critically Vulnerable Coastal Areas

Prepared as per Coastal Regulation Zone Notification, 2011

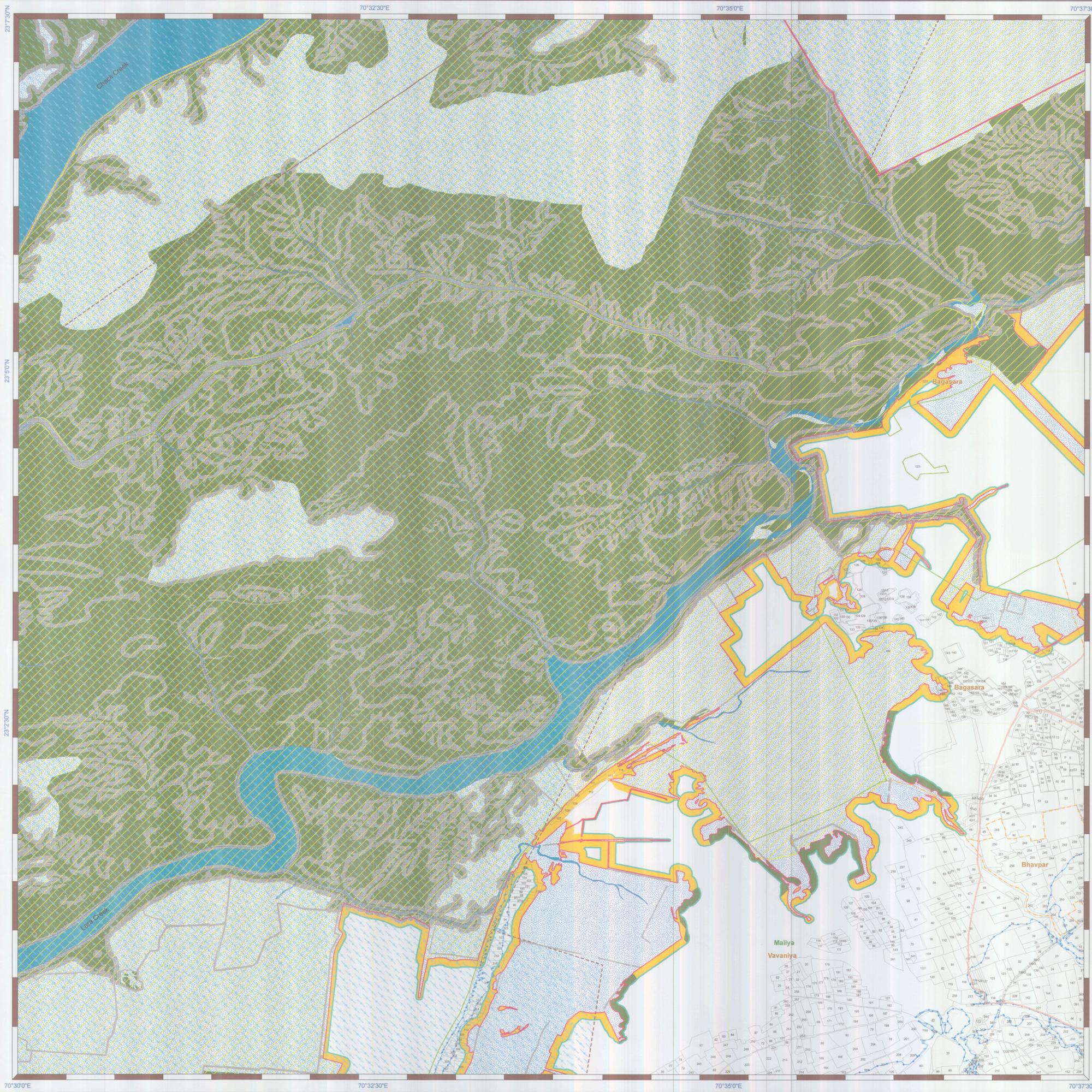
Scrutinized by	Certified by	Concurred by	Approved by
 Technical Scrutiny Committee National Centre for Sustainable Coastal Management, MoEF & CC	 DIRECTOR National Centre for Sustainable Coastal Management, MoEF&CC	 Director (Environment) Government of Gujarat Forest & Environment Department Gandhinagar.	 National Coastal Zone Management Authority MoEF & CC, Government of India

Prepared by

National Centre for Sustainable Coastal Management
 (Ministry of Environment, Forest & Climate Change)
 Chennai - 600 025

Prepared for

FORESTS AND ENVIRONMENT DEPARTMENT
 Government of Gujarat



COASTAL ZONE MANAGEMENT PLAN

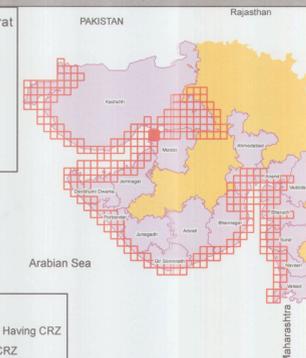
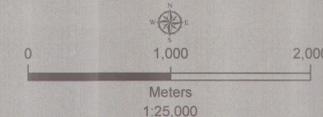
GUJARAT

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Sheet No: F 42 E 12/SW

Projection - UTM Datum - WGS 1984

Map No. : GJ 204

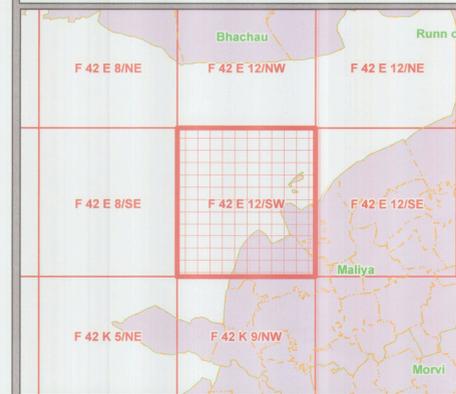


Legend

- Coastal Districts Having CRZ
- Districts Out of CRZ

Legend

- Lighthouse
- Port
- Fishing Harbours
- Fish Landing Centre
- Road
- Railway Line
- Bund
- High Tide Line
- Low Tide Line
- Municipal/Other Urban Areas
- Village Boundary
- Taluk Boundary
- State Boundary
- Survey Plots
- Port Limit
- Ecologically Sensitive Zone
- Breakwater or Jetty
- Diversion of Reserved Forest



CRZ Lines & Boundary

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- CRZ - IV**
- CRZ - IVA
 - CRZ - IVB

DATA SOURCE

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 - Hazard Line
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 - Administrative Boundaries, 2) Infrastructure facilities such as Fish Landing Centre, Fishing Harbour,
 - Ecologically Sensitive Zone etc

ABBREVIATIONS

- CRZ : Coastal Regulation Zone
- NDZ : No Development Zone
- CVCA : Critically Vulnerable Coastal Areas

PREPARED AS PER COASTAL REGULATION ZONE NOTIFICATION, 2011

Verified by	Certified by	Concurred by	Approved by

Prepared by
NCSCM
 National Centre for Sustainable Coastal Management
 (Ministry of Environment, Forest & Climate Change)
 Chennai - 600 025

Prepared for

FORESTS AND ENVIRONMENT DEPARTMENT
 Government of Gujarat



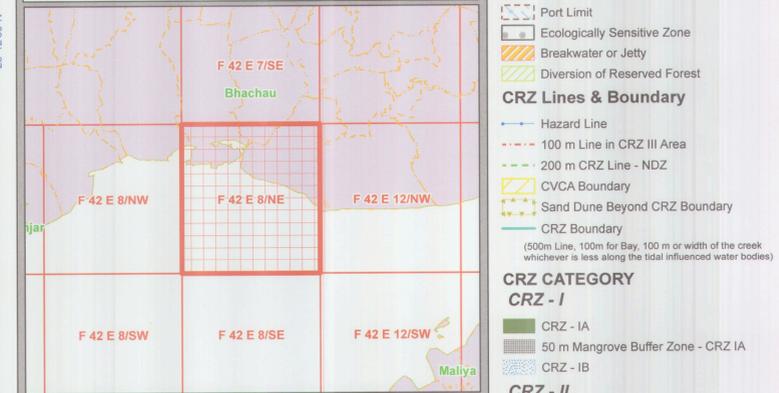
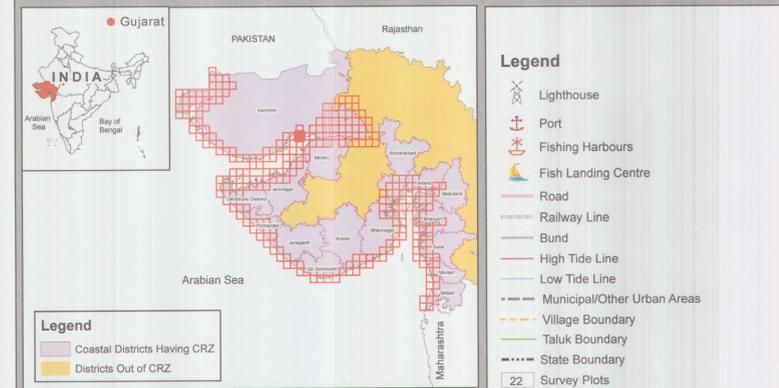
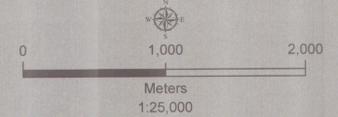
COASTAL ZONE MANAGEMENT PLAN

GUJARAT

Sheet No: F 42 E 8/NE

Projection :- UTM Datum :- WGS 1984

Map No. : GJ 219



- Legend**
- Lighthouse
 - Port
 - Fishing Harbours
 - Fish Landing Centre
 - Road
 - Railway Line
 - Bund
 - High Tide Line
 - Low Tide Line
 - Municipal/Other Urban Areas
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Mapped During 2017-18

PREPARED AS PER COASTAL REGULATION ZONE NOTIFICATION, 2011

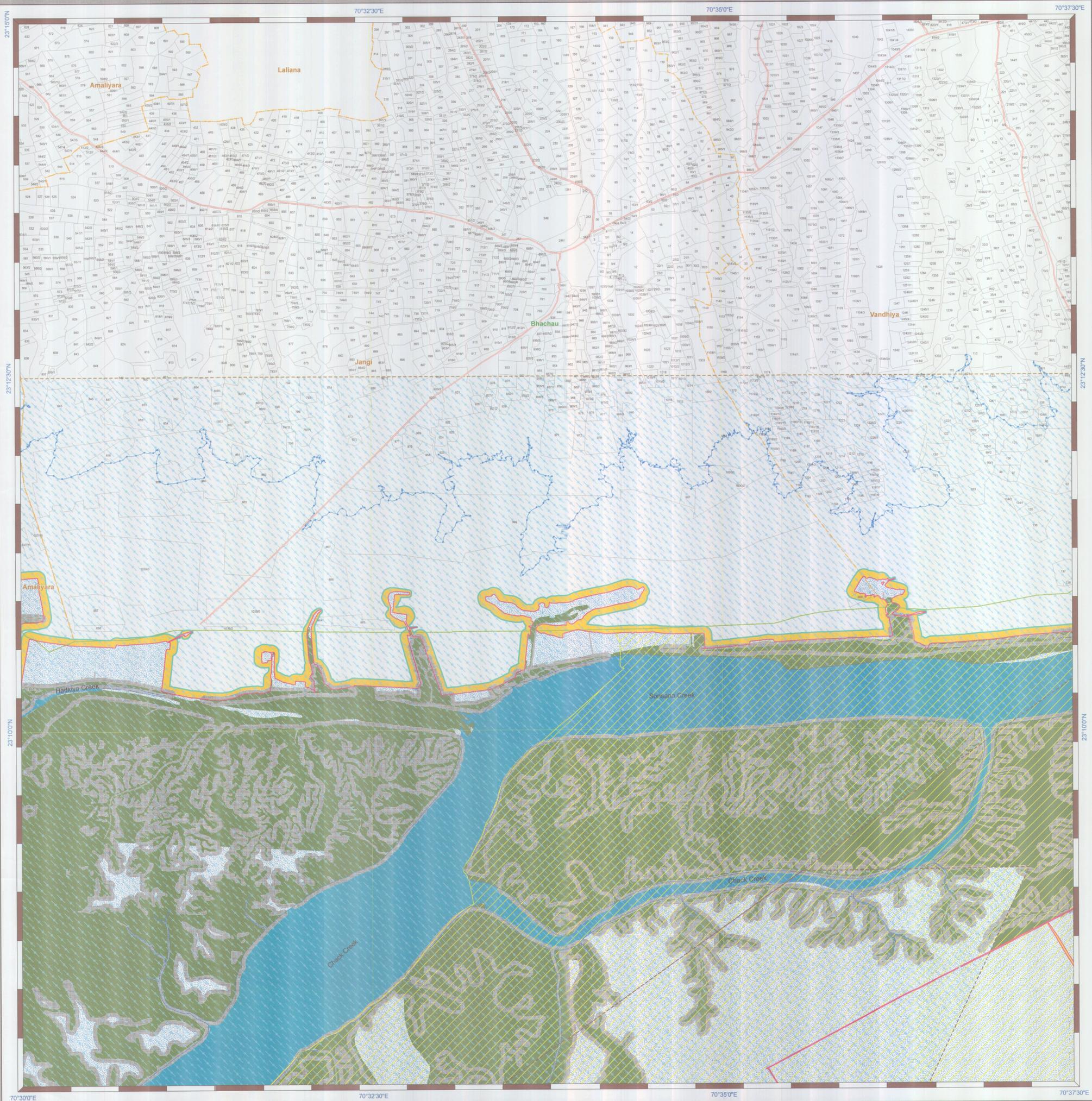
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National Centre for Sustainable Coastal Management
 (Ministry of Environment, Forest & Climate Change)
 Chennai - 600 025

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FORESTS AND ENVIRONMENT DEPARTMENT
 Government of Gujarat



COASTAL ZONE MANAGEMENT PLAN

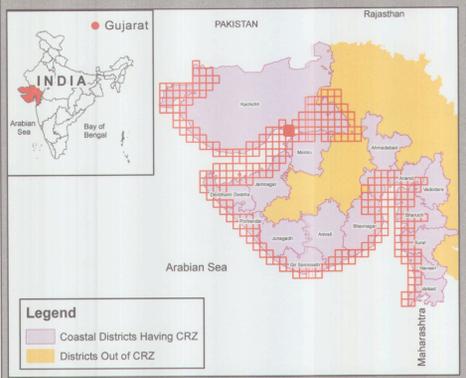
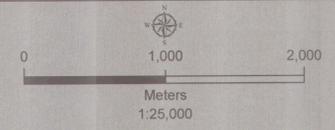
GUJARAT

Revised

Sheet No: F 42 E 12/NW

Projection : UTM Datum : WGS 1984

Map No. : GJ 220



- Legend**
- Lighthouse
 - Port
 - Fishing Harbours
 - Fish Landing Centre
 - Road
 - Railway Line
 - Bund
 - High Tide Line
 - Low Tide Line
 - Municipal/Other Urban Areas
 - Village Boundary
 - Taluk Boundary
 - State Boundary
 - Survey Plots
 - Port Limit
 - Ecologically Sensitive Zone
 - Breakwater or Jetty
 - Diversion of Reserved Forest



- CRZ Lines & Boundary**
- Hazard Line
 - 100 m Line in CRZ III Area
 - 200 m CRZ Line - NDZ
 - CVCA Boundary
 - Sand Dune Beyond CRZ Boundary
 - CRZ Boundary
- (500m Line, 100m for Bay, 100 m or width of the creek whichever is less along the tidal influenced water bodies)

- CRZ CATEGORY**
- CRZ - I**
- CRZ - IA
 - 50 m Mangrove Buffer Zone - CRZ IA
 - CRZ - IB

- CRZ - II**
- CRZ - II

- CRZ - III**
- No Development Zone
 - 200 to 500 m from HTL

- CRZ - IV**
- CRZ - IVA
 - CRZ - IVB

- DATA SOURCE**
- National Center for Sustainable Coastal Management
 - HTL, LTL, 2) CVCA, 3) CRZ Lines, 4) CRZ - IA, 5) Infrastructure facilities such as Lighthouse, Breakwater or Jetty
 - Survey of India
 - Hazard Line
 - Gujarat State Coastal Zone Management Authority
 - Administrative Boundaries, 2) Infrastructure facilities such as Fish Landing Centre, Fishing Harbour, 3) Ecologically Sensitive Zone etc.

- ABBREVIATIONS**
- CRZ : Coastal Regulation Zone
 - NDZ : No Development Zone
 - CVCA : Critically Vulnerable Coastal Areas

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