

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE AT  
CHENNAI**

Original Application No. 152 of 2023

Kumaresan Sooluran

...Applicant

Vs

The Tamilnadu Coastal Zone

Management Authority & Ors

...Respondents

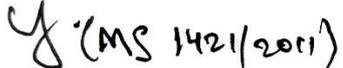
**MEMO FILED BY APPLICANT**

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Certified to be true copies of the respective originals

Dated on this the 24<sup>th</sup> day of June, 2025 at Chennai

 (MS 1421/2023)

Counsel for the Applicant

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1. The 4<sup>th</sup> Respondent filed a report dated 28.11.2024, undertaking to dredge the Kosasthalaiyar at three specific locations, viz. Kattupalli, Puzhuthivakkam, Athipattu areas, commencing from 30.11.2024, in order to remove the charu mussel / kaakka aazhi / mytella strigata, and this Hon'ble Tribunal recorded the above undertaking in its order dated 29.11.2024.
2. Over three months after the undertaking and over three months after the date on which dredging was to commence (i.e. 30.11.2024), the 4<sup>th</sup> Respondent filed a report dated 17.03.2025, stating that the work in the above locations "*shall be initiated based in the approval and allocation of necessary funds.*"
3. The Applicant has filed a list of dates of events dated 24.06.2025, which demonstrates that the state government has miserably failed to honour their own undertakings recorded by this Hon'ble Tribunal in orders dated 24.09.2024, 03.10.2024, and 29.11.2024, among others.

4. The spread of the kaakka aazhi has only increased with the passage of time, and the livelihood of fishers in the Ennore-Pulicat wetlands is being adversely affected with every passing day.
5. The 4<sup>th</sup> Respondent has filed a map at pg. 9 of the typed set dated 18.03.2025, on which the area being dredged has been marked. The Applicant filed a map at pg. 157 of the original application, classifying the entire stretch into areas of high infestation (marked in red), medium infestation (marked in orange) and low infestation (marked in yellow). The above maps would show that the dredging is not even taking place at highly infested sites such as karukkumaram kandachedi paadu, jalli kuli paadu etc.
6. The limited dredging that is taking place at the 1700 m stretch from the railway bridge to Athipattu bridge is in compliance with the orders of this Hon'ble Tribunal in O.A. No. 8 of 2016, pertaining to the removal of ash in the Kosasthalaiyar river due to the leaky ash slurry disposal pipelines of the Tamil Nadu Generation & Distribution Corporation Limited's (TANGEDCO's) North Chennai Thermal Power Station (NCTPS). It is submitted that the State Government has combined the dredging operations for the removal of the kaakka aazhi and fly ash, pursuant to orders of this Hon'ble Tribunal in two separate proceedings, without any application of mind whatsoever.
7. Even the dredging that is currently taking place is happening in a completely unsystematic manner, which has led to different points of the subject area being dredged to different extents. The ideal depth for fishing grounds in this area is 3.2 – 5 ft. However, the ongoing dredging work has led to vast differences in the depth of the waterbody in the very

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same area, ranging from 14.75 feet to 1.29 ft. As a result of this, the boats of artisanal fishers are not able to pass through large stretches of the waterbody, particularly during the low tide. It is submitted that dredging conducted without any consultation of the fishers has seriously damaged their fishing grounds or paadu.

8. A tabulation of the depth of various points in this area and the uneven dredging taking place, as recorded on 24.06.2025, is produced below for convenience:

<b>Sl.No.</b>	<b>GPS Point</b>	<b>Measured Depth (in feet)</b>	<b>Original Depth (in feet)</b>
1	13.224717 N, 80.319733 E	4.08	3.28
2	13.225033 N, 80.319683 E	14.75	3.28
3	13.225100 N, 80.319583 E	6.58	6.56
4	13.225800 N, 80.319550 E	7.33	4.10
5	13.226383 N, 80.319700 E	7.67	4.10
6	13.227300 N, 80.318183 E	6.00	4.10
7	13.228300 N, 80.318700 E	10.08	5.74
8	13.230067 N, 80.317550 E	8.33	4.92
9	13.229933 N, 80.317267 E	3.58	2.46
10	13.230433 N, 80.315617 E	5.25	2.46
11	13.233267 N, 80.316300 E	10.00	3.28
12	13.233933 N, 80.314833 E	8.83	4.92
13	13.235117 N, 80.315383 E	5.67	6.56
14	13.235433 N, 80.315750 E	10.17	4.92
15	13.236883 N, 80.315083 E	9.00	6.56
16	13.238000 N, 80.316233 E	5.67	4.92
17	13.239267 N, 80.315750 E	4.67	6.56
18	13.241783 N, 80.315433 E	8.33	4.92
19	13.241950 N, 80.315917 E	6.00	6.56

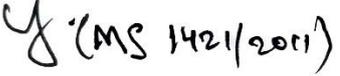
20	13.241617 N, 80.316350 E	4.33	6.56
21	13.242317 N, 80.316300 E	1.29	6.56
22	13.242817 N, 80.315117 E	10.33	4.92
23	13.243000 N, 80.315317 E	9.33	5.74
24	13.243417 N, 80.316167 E	2.92	6.56
25	13.243933 N, 80.315217 E	8.50	5.74
26	13.244183 N, 80.314350 E	2.83	4.92
27	13.245750 N, 80.314650 E	9.50	4.92
28	13.246683 N, 80.313900 E	2.58	6.56
29	13.247517 N, 80.314750 E	4.42	4.92
30	13.247733 N, 80.314333 E	7.50	6.56
31	13.248450 N, 80.314200 E	4.00	8.20
32	13.248450 N, 80.314400 E	5.83	6.56
33	13.248417 N, 80.314800 E	5.58	4.92

9. Vide judgment dated 23.07.2024 in OA Nos. 67 of 2022 and 93 of 2022, this Hon'ble Tribunal had found that the Tamil Nadu Transmission Corporation (TANTRANSCO) had erected transmission towers in the CRZ area and in deviation from the original locations, and had also imposed a penalty of Rs. 25,00,000/- on TANTRANSCO. However, the abject failure of TANTRANSCO to remove the illegal dumped debris has led to the further spread of the kaakka aazhi, since the debris is a conducive substrate for new colonies of the mussel.

Photographs of the infestation in the subject area taken on 10.06.2025 and 24.06.2025 during the high tide, as well as a map plotting the areas where the movement of boats is obstructed and where the dredging is taking place, have been filed along with this memo.

It is therefore prayed that this Hon'ble Tribunal may be pleased to take this memo on record, and pass such orders as it deems fit, proper and necessary in the interest of justice.

Dated on this the 24<sup>th</sup> day of June, 2025 at Chennai

 (MS 1421/2021)

Counsel for the Applicant

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Kattupalli Road, Puzhuthivakkam,  
Kattupalli, Tamil Nadu 600120,

Lat: 13.291210, Long: 80.329549

10 Jun, 25, 01:09 pm, Tuesday



33.9°



NE



GPS Map Camera

### Athipattu, Tamil Nadu, India

68x7+gr2 Power Station Road Bridge, Nctps Rd,  
Athipattu, Tamil Nadu 600120, India

Lat 13.248372° Long 80.314602°

11/06/2025 04:35 PM GMT +05:30



8



Kattupalli Road, Kattupalli, Tamil  
Nadu 600120, India,

Lat: 13.295655, Long: 80.328467

10 Jun, 25, 01:20 pm, Tuesday



33.9°



NE

9



Puzhuthiyakkam, Tamil Nadu,  
India,

Lat: 13.262656, Long: 80.320881

10 Jun, 25, 12:29 pm, Tuesday



35.11° NE

10



Ash Pipeline Rd, Puzhuthivakkam,  
Tamil Nadu 600120, India,

Lat: 13.267342, Long: 80.324074

10 Jun, 25, 12:45 pm, Tuesday

   
35.1° NE

11



Ash Pipeline Rd, Puzhuthivakkam,  
Tamil Nadu 600120, India,

Lat: 13.258983, Long: 80.318497

10 Jun, 25, 12:24 pm, Tuesday



0°



NE

12



GPS Map  
Camera (Lite)

Ennore, Chennai, Tamil Nadu, India

Latitude  
13.229974°

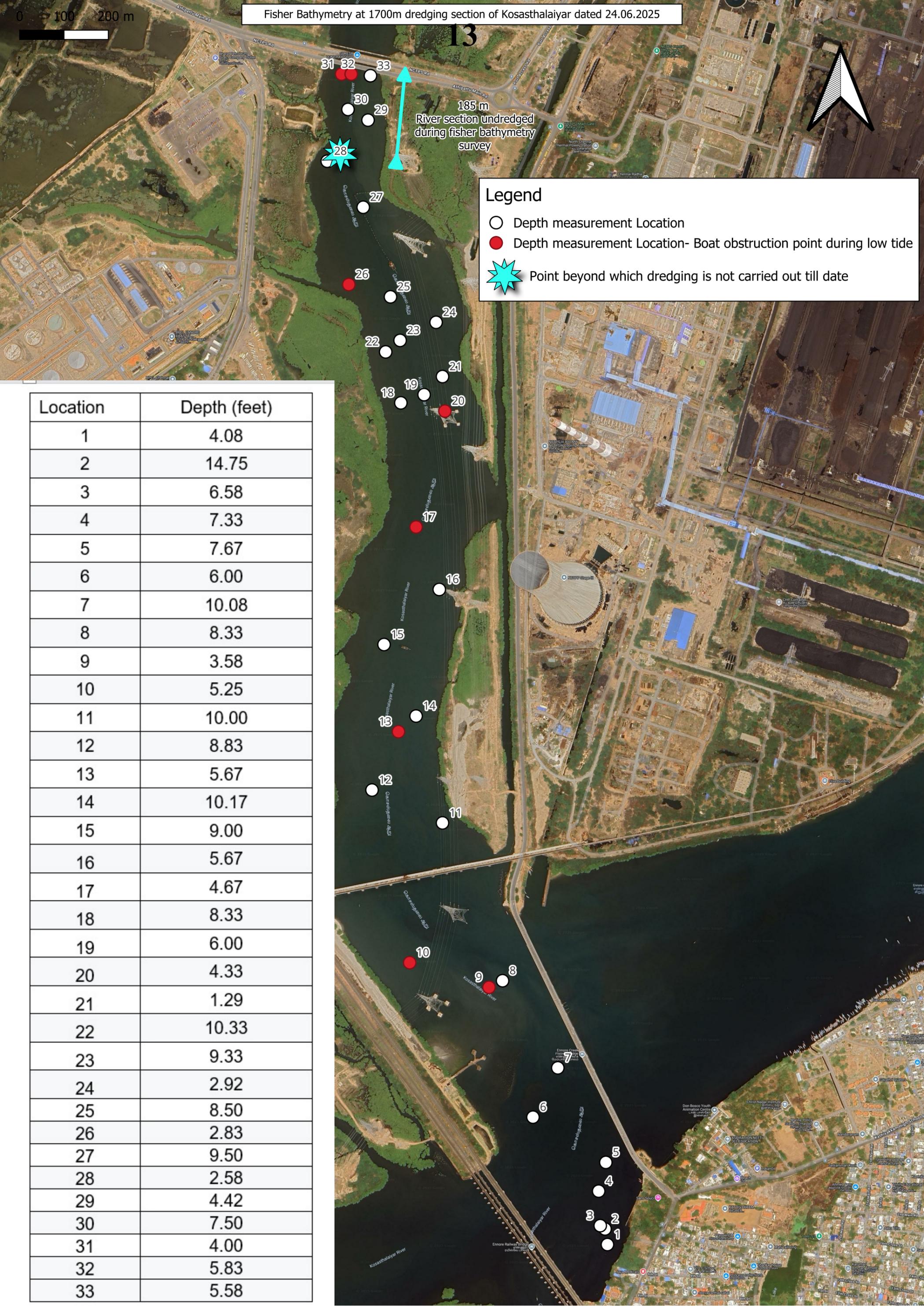
Longitude  
80.317180°

Local 07:47:32 AM  
GMT 02:17:32 AM

Altitude 3.6 meters  
Tuesday, 06/24/2025

0 100 200 m

Fisher Bathymetry at 1700m dredging section of Kosasthalaiyar dated 24.06.2025



**Legend**

- Depth measurement Location
- Depth measurement Location- Boat obstruction point during low tide
- ★ Point beyond which dredging is not carried out till date

Location	Depth (feet)
1	4.08
2	14.75
3	6.58
4	7.33
5	7.67
6	6.00
7	10.08
8	8.33
9	3.58
10	5.25
11	10.00
12	8.83
13	5.67
14	10.17
15	9.00
16	5.67
17	4.67
18	8.33
19	6.00
20	4.33
21	1.29
22	10.33
23	9.33
24	2.92
25	8.50
26	2.83
27	9.50
28	2.58
29	4.42
30	7.50
31	4.00
32	5.83
33	5.58