

**BEFORE HON'BLE NATIONAL GREEN TRIBUNAL
(NEW DELHI)**

Original Application No. 170/2022

IN THE MATTER OF:

Anupam Verma

Applicant

VERSUS

The State of Uttar Pradesh

Respondent

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Place: New Delhi

Date: 19/01/2023

Through



(PANSHUL CHANDRA)

Advocate

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BEFORE HON'BLE NATIONAL GREEN TRIBUNAL
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The State of Uttar Pradesh

Respondent

**REPLY ON BEHALF OF UTTAR PRADESH EXPRESSWAYS AND
INDUSTRIAL DEVELOPMENT AUTHORITY (UPEIDA)**

MOST RESPECTFULLY SHOWETH:

1. That I Shrish Chandra Verma son of Late Someshwar Verma, Age-58 years, Educational Qualification - Post Graduate, R/o. J-65, Ashiyana, Lucknow - 226012, *Shrish Chandra Verma* working *in Delhi* on the post of Addl. Chief Executive Officer and as such, well conversant with the facts of the case on the basis of records thereof, and duly authorized and competent to swear this affidavit on behalf of UPEIDA in the above matter.
2. That I have read and understood the original application and filing this as reply thereto.
3. That the deponent craves liberty to raise additional submission or file additional affidavits in case need arises during the course of arguments.

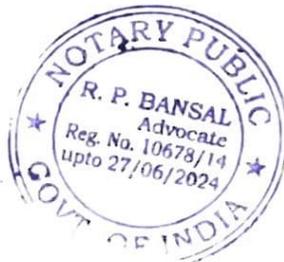
✓ *[Signature]*



4. **Brief Submissions on factual and action taken report:-**

- A. That Purvanchal Expressway is starting from NH-731, district Lucknow and ending in UP-Bihar border, in district Ghazipur, passing through the districts Lucknow, Barabanki, Amethi, Sultanpur, Ayodhya, Ambedkar Nagar, Azamgarh, Mau, Ghazipur covering the length of approximate 340.824 KM.
- B. That the Hon'ble NGT vide order dated 16/11/2022 asked the answering respondent to submit a detailed reply on recommendations by the joint committee that can be implemented by the answering respondent.
- C. That in compliance with recommendations as narrated in the Hon'ble NGT order dated 23.08.2022 "**12.1 Considering the data of the UP-Groundwater Department, the installation of groundwater recharge structures through recharge well is not required in the region of Purvanchal Expressway as artificial recharge to ground water is mandatory when the groundwater level is more than 8.00 mbgl during post monsoon period as per state government norms, whereas the area along the Expressway observed less than 8.00 mbgl during post monsoon period.**"

The answering respondent has engaged third party services for the collection of ground water data which has been collected at various locations of the project in question including toll plazas. The true copy of water level measurement data is annexed herewith and marked as **Annexure A/1**.



D. That in compliance with recommendation "12.2. *The existing 176 recharge structures can be converted for storing the collection of rainwater to utilize it for horticulture/ green belt development to minimise the fresh groundwater extraction besides surplus rainwater should be diverted in the natural water bodies viz. Ponds, Lakes, etc.*"

The answering respondent has plugged the existing 176 recharge structures for storing the collection of rainwater to utilize it for horticulture for green belt development to minimize the fresh ground water extraction. The true copy of list & photographs after plugging the recharge well are attached herewith and marked as **Annexure A/2.**

E. That in compliance with recommendation "12.3 *The NHAI/UPEIDA can be asked to monitor the water level data of Pre & Post monsoon period of every year through the borewell/piezometer installed at the toll plazas.*"

That the post monsoon water level has been monitored through the borewell/piezometer by third party and the reports are already annexed as **Annexure A/1.** The pre monsoon data will be collected in the month of May, 2023. This exercise will be conducted every year.

F. That in compliance with recommendation "12.4 *NHAI/UPEIDA can be asked to adopt at least 10 Hectare natural pond/lake in each semi-critical category blocks namely Ahirauala, Palhani and Sathiyaon in Azamgarh district and ensure the*

✓ 



recharging of groundwater through natural ponding and its annual maintenance before onset of monsoon."

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That the answering respondents have already developed several naturalpond/lakeduring construction of Purvanchal Expressway. The photographs are enclosed as **Annexure A/3**. In semi critical category blocks namely Ahiraula, Palhani&SathiyaoninAzamgarhdistrict,about 67.25 hectare area has been converted in ponds along the PurvanchalPxxpressway. The list is annexed herewith and marked as**Annexure A/4**.

G. The compliance with recommendation "**12.5. NHAI/UPEIDA can be asked for intensive afforestation with consultation of forest department suitable varieties of plant trees in appropriate places on the highway, which can be helpful in enhancing ground water recharge**"

That the answering respondent has planted 5,59,900 trees on Purvanchal Expressway, which can be divided into two main categories i.e Avenue and Median plantation. The Avenue plants consists of species like Sheesham, Jamun, Arjun, Neem, Siris, Chitwan, Kachnar, Cassia siamea, Pipal, Bargad, Goolar, Pakad and Kanji etc. which are approximate 3,74,110 in number whereas the Median plantation consists of species like Chandni, Kachnar, Manokamini, Bottlebrush, Tichoma and Gudhal etc. which are 1,85,790 in number. The above roadside planted species are also recommended in the working plans of the Forest Divisions which are coming in the alignment of Purvanchal Expressway. These working

✓ [Handwritten signature]



- H. That Purvanchal Expressway is situated in Upper Gangetic Plains of Uttar Pradesh which comes under Sub-Tropical Deciduous Forest Category. The planted species are recommended in the IRC guideline no. IRC:SP:21-2009. Moreover the plantation activity and it's maintenance work will be executed for next five years to make the plantation establish. The plantation will play it's role in mitigating the air and noise pollution, they will also help in recharging the ground water. The true copy of the IRC guideline no. IRC:SP21-2009 is annexed herewith and marked as **Annexure A/6**
- I. That as far as the recommendation "**12.6 Detailed characterization study of surface runoff from the bitumen roads throughout the country can be conducted through the reputed organization having expertise in relevant field**" the answering respondent has engaged CSIR-Indian Institute of Toxicology Research, Lucknow for the characterization study of surface runoff available on the both sides of Purvanchal expressway. It is pertinent to mention that Indian Institute of Toxicology Research is a laboratory run under the aegis of Council of Scientific and Industrial Research and is a NABL accredited institute. The true copy of the letter dated January 12, 2023 CSIR-Indian Institute of Toxicology Research, Lucknow is annexed herewith and marked as **Annexure A/7.**
- J. That the contents of the present affidavit are true and correct to the 'best of my knowledge which is based on the official record available



in my office. Nothing material has been concealed there from, nor any part of it is false.

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DEPONENT
(Shrish Chandra Verma)
Addl. Chief Executive Officer
(UPEIDA)

VERIFICATION

Verified at Lucknow, on this the 12 3 day of JAN 2023 that the contents of the above Affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed there from.

DEPONENT
(Shrish Chandra Verma)
Addl. Chief Executive Officer
(UPEIDA)

Place: Lucknow 

Dated: 19/01/2023
12 3 JAN 2023

Through:

(PANSHUL CHANDRA)

Advocate

Place: Lucknow 
Dated: 19/01/2023


12 3 JAN 2023

ATTESTED
Notary Public, Delhi
(As Presented)
12 3 JAN 2023

Annexure-1

Rainwater Harvesting System converted into Storage tanks by plugging recharge bores at following locations:-

A. Package- 5 (All 17 Numbers of RWH constructed at following locations are being converted as Storage Tank for Irrigation Purpose of Avenue Plantation)

Sl.No.	Chainage (New)	Side	S.No	Chainage (New)	Side
1	192+770	RHS	10	201+260	RHS
2	193+040	RHS	11	202+780	LHS
3	193+270	RHS	12	204+780	RHS
4	193+770	LHS	13	205+020	LHS
5	194+020	LHS	14	208+020	LHS
6	196+250	LHS	15	209+020	RHS
7	196+530	LHS	16	213+520	LHS
8	197+270	RHS	17	215+270	RHS
9	197+520	LHS			

B. Package- 6 (No RWH is constructed in Package-6 based on U.P. Ground water department recommendations)

C. Package- 7 (All 32 Numbers of RWH constructed at following locations are being converted as Storage Tank for Irrigation Purpose of Avenue Plantation)

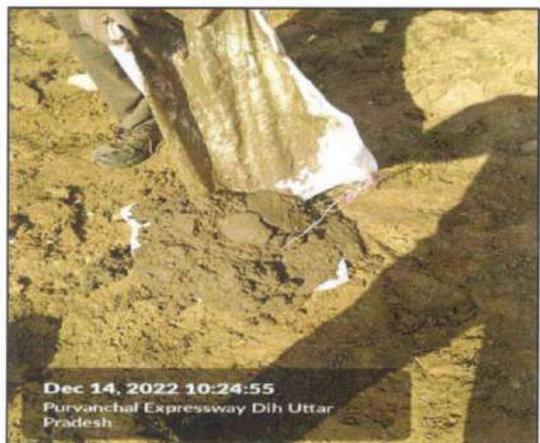
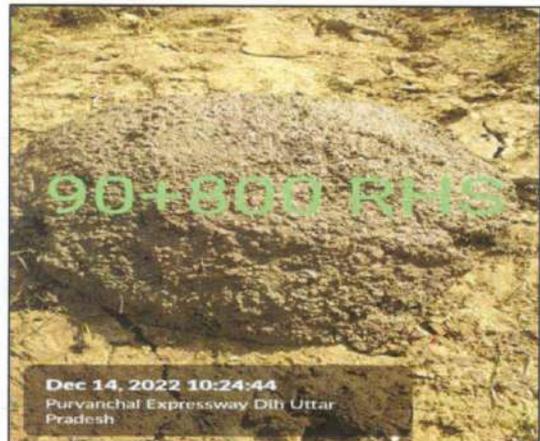
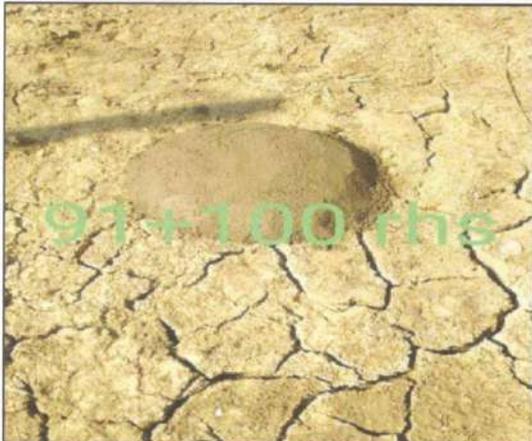
Sl.No.	Chainage (New)	Side	Sl.No.	Chainage (New)	Side
1	248+610	LHS	17	289+926	LHS
2	249+510	LHS	18	291+096	LHS
3	250+196	LHS	19	291+538	LHS
4	278+345	LHS	20	248+510	RHS
5	278+964	LHS	21	249+500	RHS
6	279+370	LHS	22	284+034	RHS
7	280+116	LHS	23	284+690	RHS
8	282+170	LHS	24	285+062	RHS

9	284+000	LHS	25	285+445	RHS
10	284+500	LHS	26	285+924	RHS
11	285+000	LHS	27	286+546	RHS
12	285+500	LHS	28	287+256	RHS
13	286+000	LHS	29	287+500	RHS
14	286+451	LHS	30	287+826	RHS
15	287+500	LHS	31	289+035	RHS
16	289+371	LHS	32	289+642	RHS
C. Package- 8 (All 7 Numbers of RWH constructed at following locations are being converted as Storage Tank for Irrigation Purpose of Avenue Plantation)					
Sl.No.	Chainage (New)	Side	Sl.No.	Chainage (New)	Side
1	293+380	LHS	5	308+900	LHS
2	294+880	LHS	6	310+550	LHS
3	294+880	RHS	7	317+620	LHS
4	307+735	LHS			

Note :- Total 56 Numbers of RWH Constructed from Package V to VIII are being converted as storage tank by plugging the recharge bore .Some Photographs are attached herewith for Package V,VII & VIII.

Development of Purvanchal Expressway (Package III) from Jaraikala (Dist. Amethi) to Sidhi Ganeshpur (Dist. Sultanpur) (Km 79+900 to Km 121+600) in the state of Uttar Pradesh on EPC Basis.

Compliance Photographs





Annexure-A



Ch-155.480 LHS

CORPORATE OFFICE :
Plot No.18, Sector-18
Novus Tower, 2nd Floor
Gurugram-122015
E-mail: delhi@grinfra.com
Website : www.grinfra.com

HEAD OFFICE:
GR House, Hiran Magri, Sector-11,
Udaipur, Rajasthan-313002, India
Phone: 0294-2487370, 2483033
Fax: 0294-2487749
E-mail: info@grinfra.com

REGISTERED OFFICE:
Revenue Block No. 223,
Old Survey No. 384/1, 384/2 Paiki
and 384/3, Khata No. 464, Kochariya,
Ahmedabad, Gujarat-382220, India





Ch-156.700 LHS

Annexure-A



Ch-157.050 LHS

CORPORATE OFFICE :

Plot No.18, Sector-18
Novus Tower, 2nd Floor
Gurugram-122015
E-mail: delhi@grinfra.com
Website : www.grinfra.com

HEAD OFFICE:

GR House, Hiran Magri, Sector-11,
Udaipur, Rajasthan-313002, India
Phone: 0294-2487370, 2483033
Fax: 0294-2487749
E-mail: info@grinfra.com

REGISTERED OFFICE:

Revenue Block No. 223,
Old Survey No. 384/1, 384/2 Paiki
and 384/3, Khata No. 464, Kochariya,
Ahmedabad, Gujarat-382220, India



JAS-ANZ



ISO 9001-2008
Reg. No. RQ91/6251

Photograph of RWH Bore Closed By Concrete of PKG-5





Photograph of RWH Bore Close By Concrete

Km:- 250+500 RHS



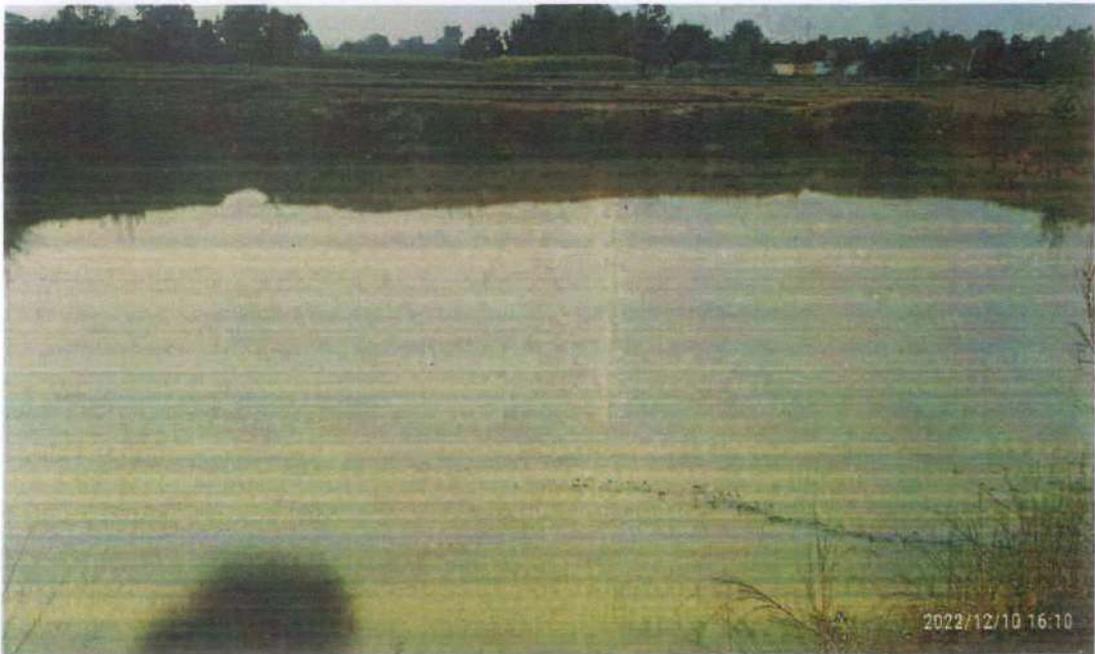
Photograph of RWH Bore Closed By Concrete of PKG-8



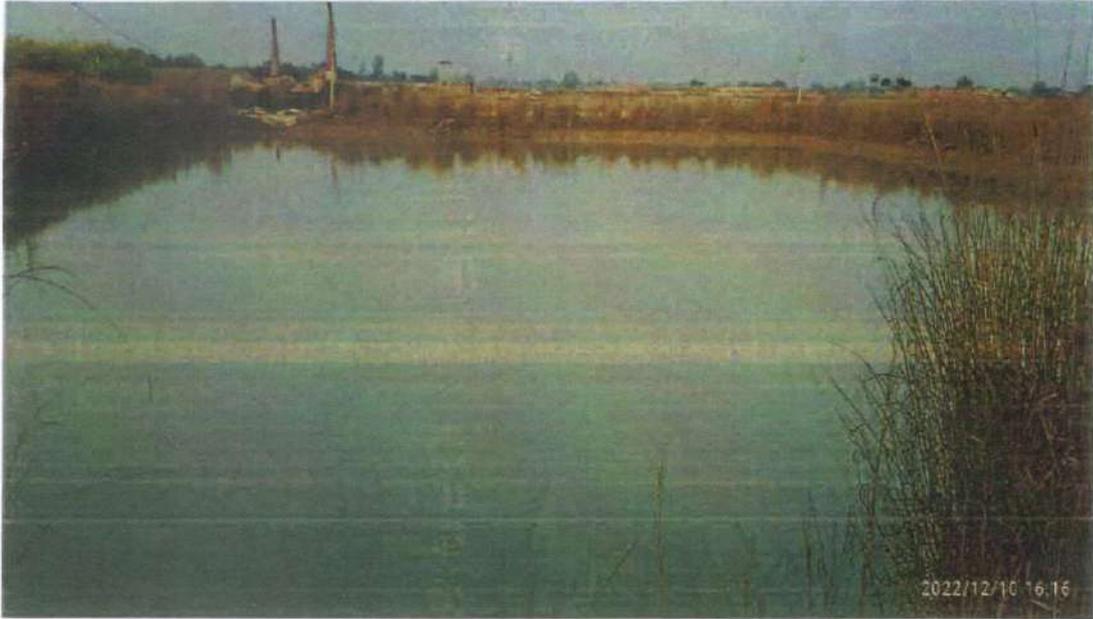
तालाब पटोना कि. मी. 195+500 के दाएं



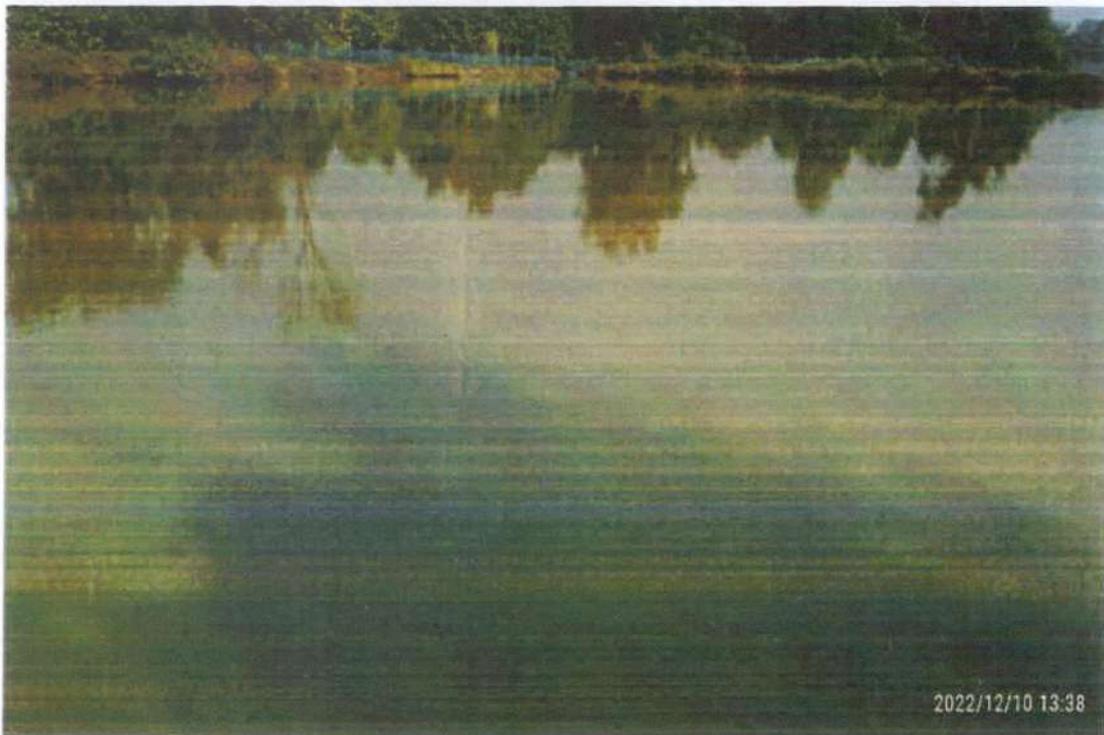
तालाब खंडोरा कि. मी. 183+400 के बाएं



तालाब हमीरपुर कि. मी. 184+600 के दाएं



तालाब नेमपुर कि. मी. 170+100 के बाएं



तालाब बारोली कि. मी. 177+100 के दाएं



तालाब धमरुआ कि. मी. 175+500 के बाएं



तालाब चदीपुर कि. मी. 179+000 के बाएं



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Borrow Area No. - 21, Lead- 1.0 Km, Village Gangotri, Block- Palhani, Tahasil- Sadar, Dist Azamgarh (UP)

(Pond)



Crangtia

Borrow Area No.45 Ch. 230+100 (RHS) (Lead 2.0 Km Village ~~Kichandapur~~ Block Palhani Tahsil Sadar Distt: Azamgarh (UP) Pond



Photograph of Pond

Village:- Sihi, Block:- Sathiyaon, Km:- 255+100 RHS



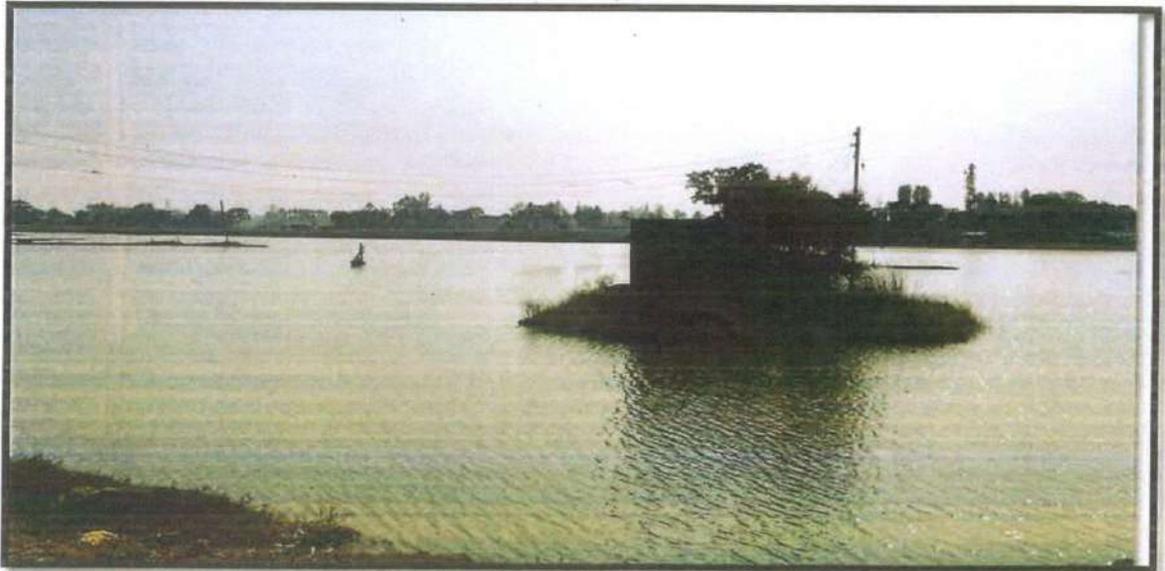
Photograph of Pond

Village:- Lohra, Block:- Sathiyaon, Km:- 252+000 RHS



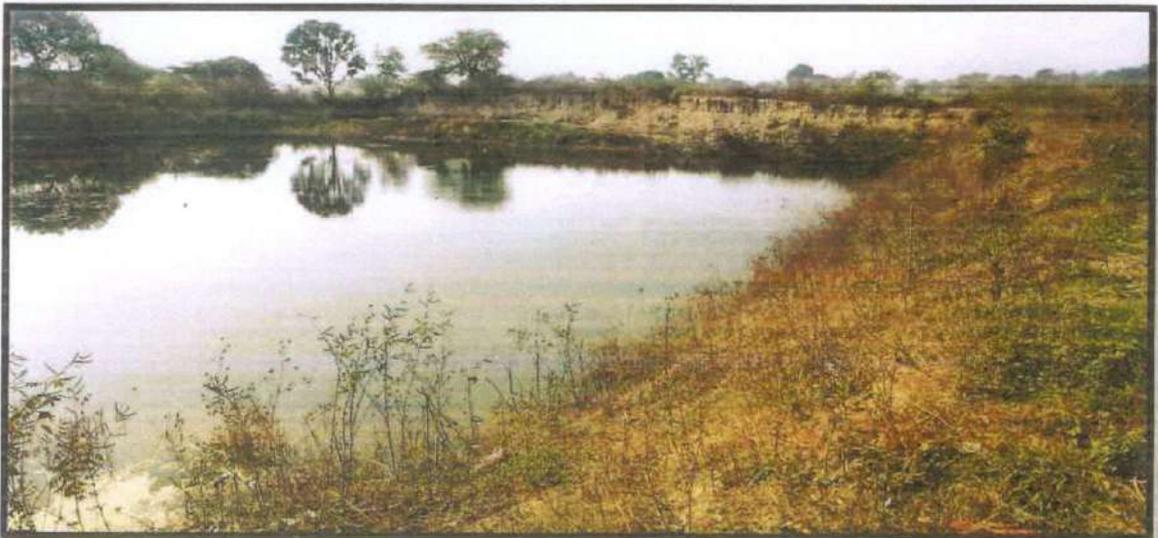
Photograph of Pond

Village:- Kerma, Block:- Sathiyaon, Km:- 261+100 RHS



Photograph of Pond

Village:- Bajha Khas, Block:- Jahanaganj, Km:- 255+100 RHS



Granghiq

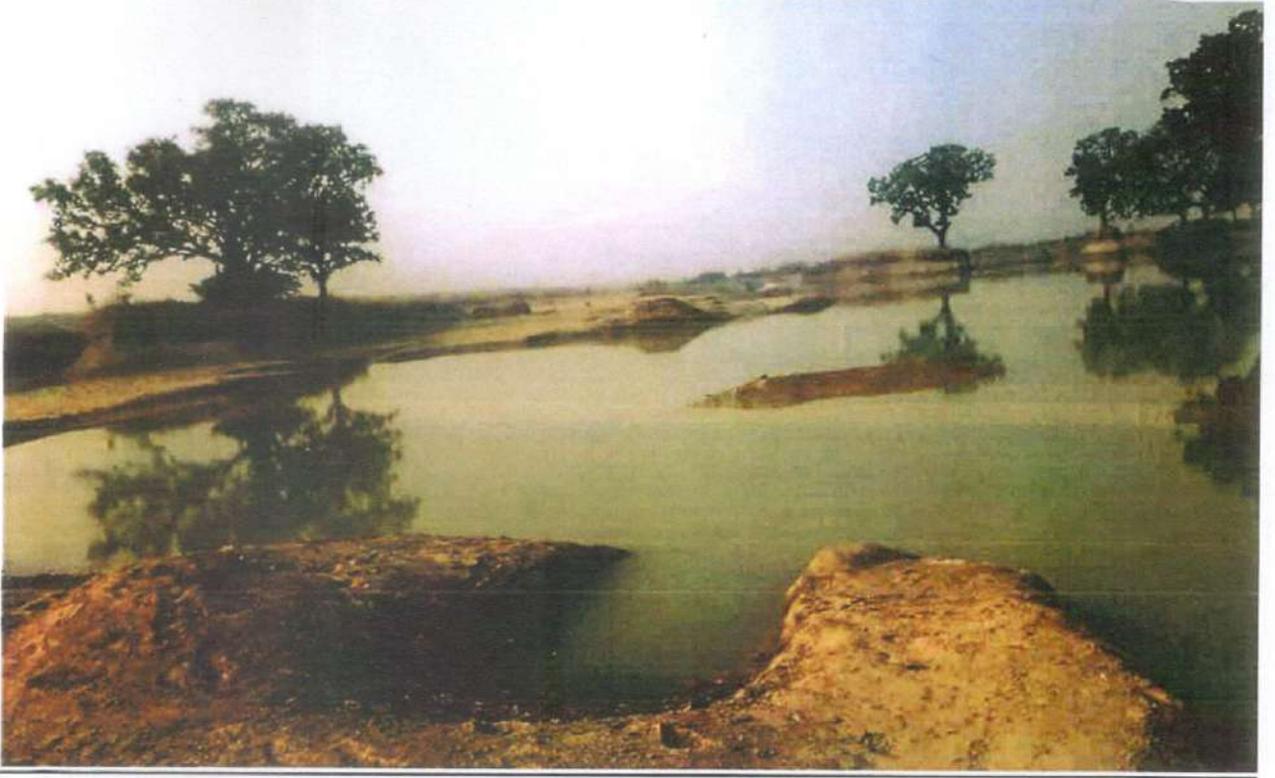
Borrow Area No.45 Ch. 230+100 (RHS) (Lead 2.0 Km Village ~~Kishorepur~~ Block Palhani Tahsil Sadar Distt: Azamgarh (UP) Pond



तालाब केलही 293+600 दाई



तालाब सिधउत 304+600 बाएं



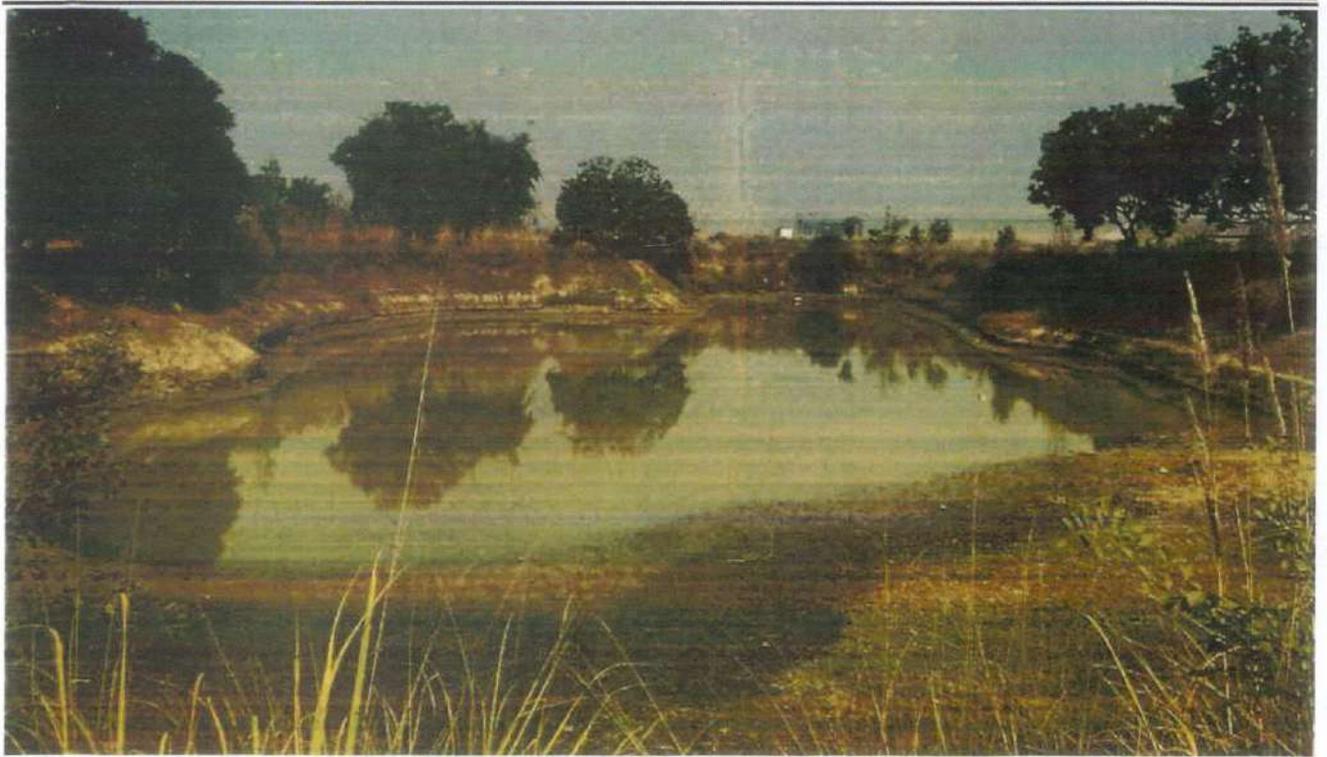
तालाब सिंगेरा 301+000 बाएं



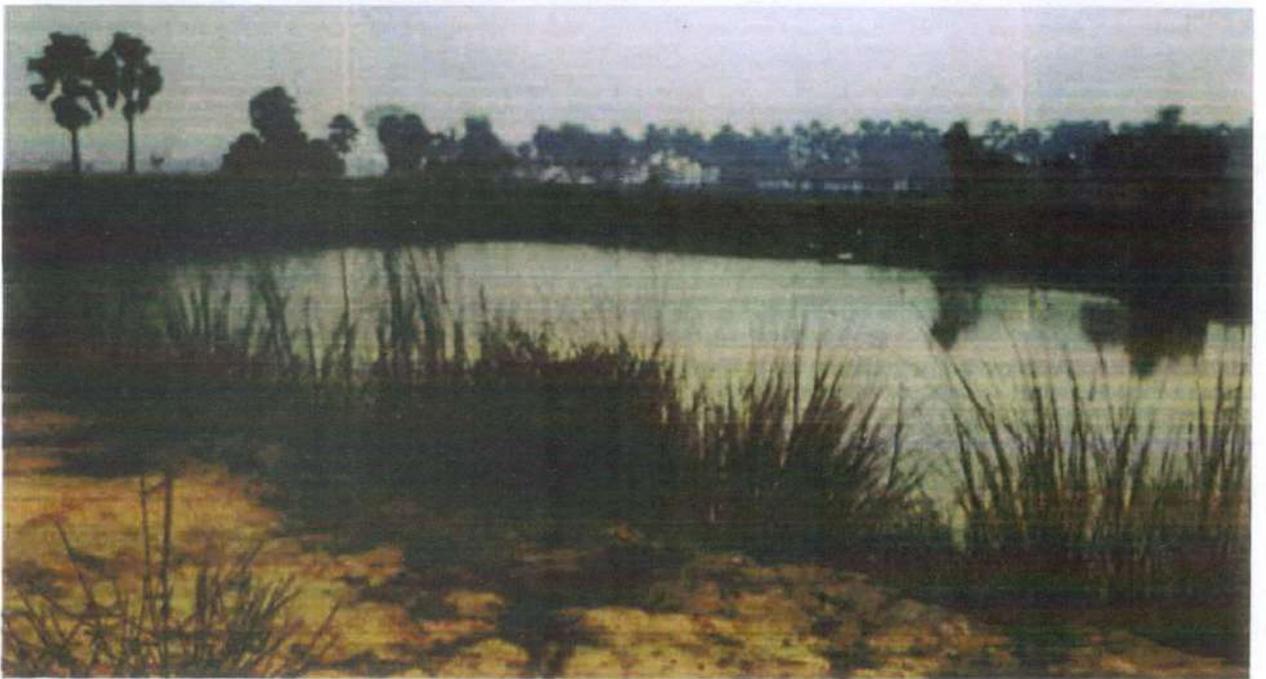
तालाब सुरजीपट्टी 316+600 दाई



तालाब मोगा सराय 329+800 दाई



तालाब धरवार खुर्द 307+000 दाई



तालाब महुवारी नौकटी 306+700 बाएं



तालाब धरवार कलां कि.मी.309+100 के बाएं



तालाब रूपईपुर कि. मी. 201+000 के बाएं



चलवाक श्राद्ध कि.मी. 206+600 के बाए



List of Pond Developed during construction of Purvanchal Expressway in Package 5 ,6,7 & 8 from Borrow Areas .

A. Package- 5 (Around 9 Major Ponds of Total 20.55 Hectare area are developed in Package-5 including Ahiraula Block) as per details given below :-

Sl. No.	District	Block	Tehsil	Village	Area (Hectare)	Approved Borrow Area No.
1	Azamgarh	Ahiraula	Phulpur	Rupaipur	4.47	38
2	Azamgarh	Mahul	Phulpur	Chakbalshah	5.12	59
3	Azamgarh	Pawai	Phulpur	Patona	2.57	41
4	Azamgarh	Pawai	Phulpur	Hamirpur	0.48	2
5	Sultanpur	Akhandnagar	Kadipur	Baroli	1.48	6
6	Ambedkar Nagar	Akbarpur	Jalalpur	Dhamrua	1.28	10
7	Sultanpur	Akhandnagar	Kadipur	Chadipur	3.5	31
8	Sultanpur	Akhandnagar	Kadipur	Nempur	1.23	100
9	Azamgarh	Pawai	Phulpur	Khandora	0.42	1
				Total	20.55	

B. Package- 6 (Around 4 Major Ponds of Total 18 Hectare area are developed in Package-6 including Palhani Block) as per details given below :-

Sl. No.	District	Block	Tehsil	Village	Area (Hectare)	Approved Borrow Area No.
1	Azamgarh	Palhani	Sadar	Gangtia	7.2	21
2	Azamgarh	Palhani	Sadar	Gangtia	4.2	45
3	Azamgarh	Palhani	Sadar	Gangtia	3.8	45
4	Azamgarh	Palhani	Sadar	Gangtia	2.8	45
				Total	18	

C. Package-7 (Around 4 Major Ponds of Total 18.176 Hectare area are developed in Package-7 including Sathiyaon Block) as per details given below :-

Sl. No.	District	Block	Tehsil	Village	Area (Hectare)	Approved Borrow Area No.
1	Azamgarh	Sathiyaon	Sadar	Lohra	4.08	84
2	Azamgarh	Sathiyaon	Sadar	Singhi	4.80	207
3	Azamgarh	Sathiyaon	Sadar	Kerma	6.04	368
4	Azamgarh	Jahanaganj	Sadar	Bajahan Khas	3.256	232
				Total	18.176	

D. Package-8 (Around 8 Major Ponds of Total 10.524 Hectare area are developed in Package-8) as per details given below :-

Sl. No.	District	Block	Tehsil	Village	Area (Hectare)	Approved Borrow Area No.
1	Gazipur	Mardah	Kasimabad	Kelhi	0.424	126
2	Gazipur	Kasimabad	Kasimabad	Sidhaut	3.73	93
3	Gazipur	Mardah	Kasimabad	Singera	0.48	162
4	Gazipur	Barachwar	Kasimabad	Surjipatti	3.53	147
5	Gazipur	Muhammdabad	Muhammdabad	Moga Sarai	0.5	84
6	Gazipur	Kasimabad	Kasimabad	Dharwar Khurd	0.375	17
7	Gazipur	Kasimabad	Kasimabad	Mahuari Naktu	0.375	99
8	Gazipur	Kasimabad	Kasimabad	Dharwar Kala	0.75	4
				Total	10.524	

Note :- Around 25 Major Ponds are developed in Package 5 to 8 of about 67.25 Hectare Area. Some Photographs of Pond are attached herewith for Package V, VII & VIII.





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Annex C
(Clause 11.11.1)

Trees suitable for Indo Gangatic Plains of Uttar Pradesh,
Punjab, Bihar and West Bengal

Botanical Name	Common Name
1. Albizzia lebeck	Siris
2. Albizzia proeera	Safed Siris
3. Butea monosperma	Palash
4. Bauhinia variegata	Kachnar (Pink)
5. Cassia fistula	Labernum/Amaltash
6. Cassia siamea	Siamese Cassia
7. Cedrela toona	Toon
8. Chikrassia tabularis	Chikasi
9. Calistemon lanceolatus	Bottle Brush
10. Dalbergia sissoo	Sheesham
11. Emblica officinalis	Aonla
12. Ficus sp	Peepal, Bagad, Pakur, etc
13. Gravellea robusta	Silver Oak
14. Hardwickia pinnata	Malabar Mahagani
15. Lagerstroemia thorli	Pride of India/Jarul
16. Lagerstroemia floriginea	-do-
17. Morus alba	Shahtoot
18. Mengifera indica	Desi Mango
19. Pterospermum acerifolium	Kanak Champa
20. Putranjiva	
21. Polyalthia longifolia	Ashok
22. Syzigium cumini	Jamoon
23. Terminalia arjuna	Arjun
24. Terminalia belerica	Bahera
25. Terminalia chebula	Harr/Myrobalam
26. Tecoma argentia.	

SHRUBS

1. Bauhinia alba	
2. Bauhinia acuminata	
3. Bougainvella	Garden glory
4. Cassia biflora	
5. Cassia alata	
6. Cassia lavigata	

7.	Calliandra	
8.	Duranta	
9.	Gardenia floria	
10.	Hamelia	
11.	Hibiscus sps.	
12.	Ixora	
13.	Nerium oleander	Kaner
14.	Thevetia nerifolia	Yellow Kaner
15.	Tecoma stans	
16.	TMS single and double	

Annex D
(Clause 11.11.1)

List of Trees suitable for North Eastern States, North Bengal, Assam, etc.

Botanical Name	Common Name
1. Alstonia scholaris	Chatuni/Saptarni
2. Albizzia lebeck	Siris
3. Cryptomeria japonica	Dhupi
4. Colvelia racemosa	
5. Cratevea religiosa	Barna
6. Cinchona sps	Cinchona (Quinine tree)
7. Lagerstroemia floriginea	Pride of India
8. Lagerstroemea thoralis	-do-
9. Michelia champaka	Champa
10. Pterospermum acerifolium	Kanak Champa
11. Shorea robusta	Saal

SHRUBS

1. Bauhinia alba	
2. Bauhinia acuminata	
3. Bougainvella	Garden glory
4. Calliandra	
5. Duranta	
6. Gardenia floria	
7. Hibiscus sps.	
8. Ixora	
9. Nerium oleander	Kaner
10. Thevetia nerifolia	Yellow Kaner
11. TMS single and double	

Ref No 7415 / 2637/ UPEIDA/Parya/2022

Dated- 12 January, 2023

To,

The Director,
CSIR-Indian Institute of Toxicology Research,
Vishvgyan Bhawan, 31-Mahatma Gandhi Marg,
Lucknow-226001.

Sub:-Characterization Study of surface runoff available on the both sides of
Purvanchal Expressway.

Ref:-Your invoice no.-CSIR-IITR/RPBD-21/2023 dated January 02, 2023.

Dear Sir,

In reference to your above cited invoice it is to inform that UPEIDA has deposited the total charges for collection and characterization study of grab samples in the given bank account through RTGS to conduct the analysis of surface runoff (water) on the six different sites of Purvanchal Expressway.

It is humbly requested to provide the characterization study report of surface runoff (water) samples available on the Purvanchal Expressway as early as possible.

Regards


(Shrish Chandra Verma)
IAS
Addl. Chief Executive Officer

Copy to:-

- 1- Chief Executive Officer, UPEIDA, Lucknow.
- 2- Chief Engineer, Purvanchal Expressway, UPEIDA, Lucknow

Addl. Chief Executive Officer