

Comments/ Suggestion received on Draft CRZ Notification, 2018

S. No.	Received from	Comment/Suggestion
1	Rajeev Naik Panaji, Goa - 403001 Mob: +91-9823020444 info@rajeevnaik.in	CRZ-III A NDZ should be up to 100 meters from HTL. CRZ-IIIB NDZ should be 50 meters from HTL. CRZ -III A and B should be used for temporary occupancy purposes only. Properties at a <u>height above sea level</u> should not be affected by the CRZ policy as the high tide water will never reach such properties.
2	Vijayalakshmi Narayanan deenviji@gmail.com	Sand dunes which is not part of ESA and only is geo morphological feature so construction must be allowed on stilts at least along this stretch Sand dunes in the first 100 meters are more than enough to protect the coast. As sand dunes are not as sensitive as mangroves, coral reefs, salt marshes etc.
3	Kevin Silveira kevinsil2510@gmail.com	Due to global warming, there is a rise in the water level construction beyond 50mts will destroy the sand dunes, natural beach vegetation which act as strong barriers against these natural calamities like, tsunami. Don't change the NDZ zone from 200 to 50mts which will have huge impact on the entire coastline.
4	Verner Da Costa frias Candolim -GOA verner@santana-go.com	Appreciate, reducing the present NDZ from 200 to 50 Mts in semi urban areas. Shacks and temporary huts in NDZ Areas These structures can be fully dismantled and made of wood or coconut palms and strictures should be purely of temporary nature and no concrete or steel should be allowed. They should strictly adhere to environmental norms and have sewage treatment plants, for their shacks/huts, renewable solar, Bio energy should be encouraged. Local communities, including fisherman being allowed to provide home stays in CRZ areas is the need of the hour.
5	Sushil Gupta skg.mangla@gmail.com	Don't change distance from HTL (100 metres to 50 metres) for tidal bodies.
6	David.A. Dsouza Goa 403509 david.dsouza@ymail.com	CRZ being implemented in a constitutionally fair sciento legal manner along with integration into the town & country planning laws (with building code where applicable) panchayat act and land revenue rules/code.
7	Advocate EBENSER C L, Cochin - 34 -Mob: 9447319820	Para 1 (ii) CRZ limit of 50 mts or width of the creek whichever is less, in these lines add "subject to a maximum of 8 KMS from the estuary" Para 5.3 sub para (b) and (c) clause iii

Page: - 295 - 363 No.

295

<p>(b) Agriculture, gardens, playfields and forestry "irrespective of distance from coast";</p> <p>(c) Include cottage industries mean small entrepreneurship engaging less than 10 people.</p> <p>In mainland island NDZ should be reduced from 20 mts to 10 mts and dwelling units should be permitted subject to plinth area of 100 sq mts.</p>	<p>The areas along Tidal Influenced Water-bodies should have a separate classification under CRZ to obviate confusion between situations overlapping with those of other classes.</p> <p>In the draft notification, these have been clubbed in CRZ-III with no clarification on Population Density basis.</p> <p>Applicants seeking permission to develop should be able to obtain salinity readings from a source nominated by MoEF.</p> <p>The High Tide Line maps ought to be made available to the Public.</p>	<p>Construction of New house building may please be limited to 2000Sqft and whole house construction within the limit 200mt from HTL limited to fishermen or their legal hire otherwise fishermen may be wiped out from that area.</p>	<p>Population density shall be computed based on cohesive area having such population density, which may be forming the contiguous area forming parts of one of more panchayat areas.</p> <p>Malavan, Achra and Ratnagiri have been declared as CVCA. However, it should be added that such CVCA areas from these talukas, shall be restricted to only "CRZ-I and CRZ-IV" (i.e. "intertidal and water body" area for special consideration and management. CVCA restrictions will not apply on Land areas either in CRZ-II or CRZ-III i.e. for "CRZ INLAND".</p> <p>FSI/FAR norms also shall be implemented "as applicable from time to time".</p> <p>The restriction "Without change in present land use" in clause 5.2(iv) is without any environmental ramifications and must be deleted and drafted that "Redevelopment only with permissible nonhazardous users shall be allowed".</p> <p>Clause 5.2(vi) about allowing Temporary tourism facilities "In the Beaches" is covered under CRZ-II. Beach areas in many cases are covered in CRZ-I. This requires more clarity that such temporary tourism facilities shall be allowed in Beaches in CRZ-II, CRZ-III and CRZ-I areas.</p> <p>Clause for CRZ-III areas beyond NDZ. It is not correct that the dwelling units shall be allowed to be constructed beyond 200m NDZ, only for local inhabitants. These words/restrictions must be deleted so</p>	<p>ebenser@gmail.com</p>	8	<p>Avchal Malik, New Delhi-110 017. avchal.malik@gmail.com</p>	<p>Rajesh TP rajeshpwc@gmail.com</p>	<p>G D Chiplunkar Wadala-31 Maharashtra gopaldc2005@gmail.com</p>	10
--	--	--	---	--------------------------	---	--	--	---	----

		<p>that even the “Non Local Inhabitant/Persons from nearby city and urban areas” can construct their “weekend home”, in CRZ-III areas, which is on the fringe of urban areas.</p> <p>Clause No. 5.2(iv) deals with reconstruction of authorized buildings. In Mumbai CESS buildings/old buildings exists prior to 1967 (First DP of Mumbai) and slums are identified as enumerated much prior to 6th Jan 2011 and therefore exists and protracted lawfully. However, building plans were never approved for such old buildings prior to 1967 or for slum areas. It is therefore necessary to add following with “authorized buildings” in clause 5.2(iv).</p>
11	<p>GTCS Consultant Shreeganesh V Nair waterandenvironmentgtcs@gmail.com</p>	<p>The Construction of the Bund and the Thottappilly spillway has adversely affected the bio diversity of the region by cutting off the saline water in this area and the justification is facilitation of livelihood of a large number of farmers in the region.</p> <p>The absence of a clarity in CRZ Rules Clause 4 (2) (vi) regulating activities within the Notified Wetlands as per the Gazette Notification G.S.R. 1203 (E) [Part II Section 3 (i)] (26/09/2017) lead to interpretations that are arbitrary in Kerala, causing a flurry of Court Cases and avoidable legal costs and delays. LSGD Authorities have gone to the extent of preventing any construction within 50m on the Landward Side of the water edge. Whereas the restriction intended by the Act is clearly and logically on the water-ward side of the edge.</p>
12	<p>Tejus tejusrs03@gmail.com</p>	<p>The draft CRZ notification speaks more of exploiting than the protection of coasts and its biodiversity. While the areas of CVCAs should be given maximum protection, and the management of these areas should be brought under Govt. than local fisher folks and other communities.</p> <p>The entire draft CRZ must be reconsidered for aiming at maximum protection and less exploitation.</p>
13	<p>Ratheesh.Raju, Kerala ratheeshij@gmail.com</p>	<p>I just express my comments about this draft notification as this is one of the good step for who living this area and helpful for their life, also not affect environment. Great focus.</p>
14	<p>Ramesh Narendran, Kollam-691008, Kerala. ramesh.n1962@gmail.com</p>	<p>There are a lot of places along the coast line and backwaters of Kerala which have an elevation of 30 meters to 100 meters above sea/water level. There is no mention in the CRZ regarding such areas which are elevated and distance for no development zone for such areas from the HTL.</p>
15	<p>Gautam Mirchandani gbmirchandani@yahoo.co.in +49 representations</p>	<p>CRZ should not apply to the land situated within 500m from HTL of sea, but located on hilltop with height more than 25 m, above the mean sea level.</p> <p>Revised CZMP shall be sent to MOEF for records only and not for approval.</p> <p>Buffer zone of mangroves, should not be considered as CRZ-I.</p> <p>Construction of buildings for residential purposes, schools, hospitals, institutions, offices, public places etc. should be permissible under local town and country planning regulations as applicable from time to</p>

26

<p>time, Floor Space Index or Floor Area Ratio also shall be permitted as applicable from time to time. On landward side home stay for dwelling units shall be permitted and dwelling unit occupants may not be local residents/local community etc. Minor structural repairs to existing authorised structures without changes in external dimensions should not require CRZ clearances. CZMP should prepare in 1:4000 scale and shall be forwarded by concerned state CZMA to MoEFCC only for records not for approval. Comprehensive EIA, Disaster management plan, Risk assessment report, Social Impact analysis and consent to establish or NOC not required for building construction/ housing schemes projects. In case the CZMAs are not in operation due to their reconstitution or any other reasons such cases should be forwarded to respective authorities like local authority or SEIAA or MoEF as per the case. CVCA restrictions shall not apply on land, these projects should be processed (Except CRZ-I) as per CRZ-II or III provisions. In case of greater Mumbai, the condition of landward side of existing road or existing authorized fixed structure shall not be insisted; Mumbai is made of seven islands joined together.</p>	<p>Durai Amarnath amarsevaa@gmail.com +6 representations</p>	<p>16</p>
<p>Reduce the population density as 1000 per Sq. Km as per 2011 census in CRZ III A. Remove the word authorized in CRZ II as they cannot be any authorized structure as prior to CRZ- II this falls in CRZ III area and if the of property is assessed to tax the same has to be taken as authorized. Land ward side of existing road as defined in 5.2(ii) is to be construed as roads on North, South and West as held by the Madras High court judgment in W.P No. 2971 of 1995 and W A No. 1287 of 1995. As there is no 500mtrs from HTL in CRZ III A and III B in the proposed notifications which existed in CRZ notification 2011 the same barrier has to be removed in Clause 1(i). Under Para 2.2, in CRZ II, the villages also to be taken it to as existing legally designated Urban area for the purpose of CRZ II Areas. The National Green Tribunal Southern Zone in application No. 4/2017 dated 01.08.2017 held that if the Panchayat Area is developed then it has to be declared as CRZ II. The existing road mentioned in 5.2 (ii) to be taken as immediate prior to 2018, the date of present draft notification. This notification should be comprehensive in marking to be done by the State authorities in village map,</p>		

		<p>FMB, Registration office and at site in order the public to be aware of the distance.</p> <p>Guideline value of the property by the state authorities to be fixed differently for 'No development zone' and for other areas.</p> <p>The power to be delegated to the local authority for granting 400 Sq/mtr construction instead of 300 Sq. mts as permitted under Clause 7 (vi) (building/construction projects).</p> <p>In Clause IX (iv) instead of Traditional Coastal Communities, Residents to be substituted in order the general public to be benefitted.</p> <p>The area between Kovalam and Mahabalipuram comes with in 500mtrs from HTL. These areas belong to Trust and Temple authorities. In this area comprehensive plan to be prepared to bring in various facilities such as water sports, resorts, tourism etc., to attract more tourists.</p> <p>Since the draft notification is being issued only on 18.04.2018 the earlier notification dated 06.03.2018 for post facto permission to be extended for further period of one year.</p>
17	Ashwin Parekh ashwin.r.parekh@gmail.com	CRZ restrictions of 50 meters on the creek must be scrapped.
18	Vijay Oad vijayoad95094@gmail.com National Od Community NOC President of Gujarat State, Gujarat +1 representation	Suggestion for including of granting quarry lease of sand mining and lime mining to od and vanjara communities as it is traditional work of these communities in coastal regulation zone of Gujarat state.
19	Ram Pethe rampethe49@yahoo.com	<p>Prohibited activities within CRZ: Discharge of untreated waste and effluents from industries, cities or towns and other human settlements should not be allowed</p> <p>Port and harbour projects in high eroding stretches of the coast could not be under a prohibited activity</p> <p>Mining of sand, rocks and other sub-strata materials should be allowed with the permission from authorities not be in listed in prohibition.</p> <p>Regulation of permissible activities in the CRZ: Storage of non-hazardous cargo should not be allowed.</p> <p>Desalination plants and associated facilities should not be allowed in CRZ area</p>

<p>Buildings permitted as in (ii) above, shall be subject to the local town and country planning regulations as applicable as on the date of this Notification</p> <p>Regulation of activities in the NDZ: Construction of dispensaries, schools, public rain shelter, community toilets may not be allowed in NDZ Construction of units or auxiliary thereto for domestic sewage treatment may not be allowed in NDZ</p> <p>CRZ-IV: Power by non-conventional energy sources and associated facilities. may be allowed</p> <p>Consent to establish" or NOC from the concerned State Pollution Control Boards or Union Territory Pollution Control Committees for the projects involving discharge of industrial effluents is not required for EC and should not be required for CRZ clearance also</p> <p>CRZ areas falling within municipal limits of the Greater Mumbai: (Construction of civic amenities, stadium and gymnasium meant for recreational or sports related activities may be conveniently used for residential or commercial purposes)</p>	<p>Atul Jangam atul.jangam@lodhagroup.co m +1 representation</p>	<p>20</p>
<p>2.1.1(a) (i) Mangroves. In case mangrove area is more than 1000 sq. mts, a buffer of 50meters along the mangroves shall be provided, and such area shall also constitute CRZ -I A. However, such mangrove buffer excluding the areas abutting CRZ II shall be categorised as CRZ II. (the bold matter shall be added)</p> <p>Reg 5.2 (ii) Reconstruction of authorized buildings shall be permitted, the word 'without change in the present land use' shall be deleted. Because the redevelopment will be subject to the local town and country planning regulations as applicable from time to time. If Industry is being demolished and residential or commercial user is proposed in the reconstruction, then such less polluting user may be permitted.</p> <p>Till the new CZMP as per the new notification is approved, the CZMP prepared as per CZMP2011 shall be in force except that the CRZ belt for the CREEKS shall be 50m instead of 100m as shown in that CZMP. As the HTL is unchanged, therefore, the CRZ belt only may be revised by the local CZMA.</p>	<p>Sachin Rajee raje.sachin@rediffmail.com G.D. Arch.Architect</p>	<p>21</p>

		roads etc. The CZMP plans and DP Sheets of Greater Mumbai shall be correlated. It means in DP Sheets, distinct boundaries of high tide line, mangroves, sea and creeks etc. shall be shown.
22	SARVESH.P. NAIK sarveshraddha@rediffmail.com Goa 9545769269 / 9422390847	The NDZ for the entire CRZIII should be 50m from the high tide line and should not be dependent on population density. Sparsely populated areas are better equipped to cater to more temporary occupancy than already congested beach areas. 50m HTL is the norm more 80% of the countries worldwide.
23	Dr. A. K. Rathoure	No specific suggestion & comment
24	Janak Vaswani 9820011342	Suggestion: Bund walls that are damaged be allowed to be repaired so that damage to property from seawater may be contained, and the High Tide Line is not shifted due to such damage to bund walls.
25	Nicholas Almeida/Godfrey Pimenta, Trustees	The applicability of CRZ to the land area between HTL to 50 mts or width of the creek whichever is less has been reduced from earlier limit of 100 mtrs buffer zone. This will put lot strain on the development particularly for Manori, Malad, Mahim creeks on in Western Suburbs and Thane (Thane Creek even has a Flamingo Sanctuary), Mahul creek in Eastern Suburbs and Vasai creek.
26	Dr. Prakash N. Mesta Marine Ecologist Karnataka 9342470560; 08386)223426	Please organise Tehsil or district level meeting/ suggestion counter for coastal stake holders. If you interested in conducting public awareness programme regarding new notification-2018, our team will help MOEF in Karnataka coast.
27	Narendra Gadh	It's a big n bold step to make latest notification. I appreciate n It should have done few years ago. 🖐
28	Dr. Raviraj.Gajanana. Kadle Ashwinidhama Ayurvedic Treatment Center Krnataka 9448526026	Construction of Ayurvedic Health Care Facilities should be permitted even in NDZ areas in all CRZ III. The local inhabitants of CRZ III 1 B area should be allowed to construct dwelling units in the NDZ area after 100metres, as per 2011 CRZ notification.
29	Kevin Silveira	Don't reduce theHTL from 200 mts to 50 mts. NDZ of 200 mts shall continue to apply.
30	Ms. Sampada Deshmukh	In 2018 notification it is mentioned that on landward side of national highway or state highway passing through the NDZ resorts and hotels are allowed to develop. If the road is not state or national high way but a coastal road which is used by state transport vehicle, is it allowed to develop a resort? e.g. konkan in Maharashtra. This area comes under CRZ III B There are many tar coastal roads in konkan area which are not state or national highway in NDZ area Suggestion - include these roads also in the above said clause to increase tourism in this rural area. As per 2011 notification small plot owners (under 1 acre) are not allowed to develop resort or hotel if

		he/she is not native or not local resident. Suggestion- Allow to develop resorts or hotels to these small plot owners also which will boost tourism and also job opportunities to local youth.
31	Babu Shetye + 6 Representations Panjim, Goa	Reduction of land area from HTL to 50 mts. CRZ Goa: No development activity shall be permitted in the Khazan land. No activity shall be permitted on sand dunes area.
32	K. T. Antony Kerala - 683517	To give concessions to natives of the islands. CRZ should be done away with in the case of islands. Local Panchayaths should be given powers to decide this matter. In the proposed amendments, CRZ is proposed to be reduced to 20 meters from the river, but even 10 meters will be against the needs of the poor villagers, because their houses are even closer to the river.
33	Domnic D Fernandes	Distance from HTL line should not be reduced.
34	David.A.Dsouza, 9370747549	No specific suggestion & comment
35	Durga Prasad Rath, Member Secretary, Prakriti, NGO Puri, Odisha	Prohibited activities within CRZ: Insert at point (x) that "In the area between 200 mts -500 mts zone the drawl of ground water shall be permitted only when done manually through ordinary wells for drinking, horticulture, agriculture and fisheries and where no other source of water is available and within 200 mts from HTL drawl of ground water is strictly prohibited. At clause 5.2 (ii) after "residential purpose" and in place of "school" the word "commercial purpose" need to be inserted. Clause 5.2 (iii) modified as "existing local town and country planning regulation i.e., on 19.02.1991 as modified from time to time, and the norms for the Floor space index or Floor area ratio, which shall be as per 1991 level. At clause 5.2 (v) add "subject to the Kisam in the Record of Right (ROR) should not be Bagayat or Bagan (land having trees).
36	C V R Murty, Mining Engineer (09787706206) Flat no: J-408, Comfort Homes, Purushottapuram Visakhapatnam, Andhra Pradesh	Atomic Minerals viz: Ilmenite, Rutile, Zircon, Monazite (Radio-active) are used for the strategic purposes and should be treated as the most valuable national mineral wealth. These reserves occur in the coastal stretches and finite in nature. The proposed draft CRZ-2018 notification requires a thorough review w.r.t. Mining of atomic minerals occurring as such or in association with other minerals in CRZ-IA, III and IV areas as they are permissible activities under CRZ. Hence we would request you to kindly consider our suggestions and incorporate the same in the draft CRZ-2018 notification.
37	Shekar Arolkar Mumbai	Plots within C.R.Z. - I especially, mangroves/ World Bank Projects where clarification was sought and development has been permitted prior to the year 1996. In these cases, pending works and grant of

		<p>occupation certificates are pending. The procedure to implement provisions of C.R.Z. norms in these cases govt has allowed development prior to 1996 and such developments may be considered at M.C.G.M/ Hon'ble Mc's level.</p> <p>Plots within C.R.Z- I/II developments granted approval by way of I.O.D/ C.C under provisions of M.M.C. Act / M.R. & T.P. Act prior to 2002 on basis of valuation be considered at M.C.M.G/Hon'ble Mc's level without insisting fresh N.O.C.</p> <p>All such pending cases are disposed at Municipal level.</p> <p>In case of notified/ Declared Dilapidated structures in C.R.Z.-I/II should be considered for redevelopment as per applicable F.S.I/ F.A.R norms with incentives and these N.O. C's under M.C.Z.M.A/ C.R.Z provisions be given within stipulated periods as determined by govt.</p> <p>Plots within C.R.Z-I/II falling in Gaothan should be exempt from any N.O.C. if plot area is below 500 m².</p> <p>Cognizance to provisions as made out in Hon'ble High Court orders in W.P (Lodging) no.3246 of 2004.</p>
38	<p>Maharashtra Mumbai Association of Realtors +1 representation</p>	<p>5.2 (ii) Construction of buildings for residential purposes, schools, hospitals, institutions, offices, public places etc shall be permitted only on the landward side of the existing road, or on the landward side of existing authorized fixed structures; provided that no permission for construction of buildings shall be given on landward side of any new roads which are constructed on the seaward side of an existing road. Additionally, such constructions shall also be permitted on landward side of existing authorized fixed structures or landward side of existing structures eligible for rehabilitation under scheme of state government notified under state laws.</p> <p>5.2 (iii) Buildings permitted as in (ii) above, shall be subject to the local town and country planning regulations as applicable from time to time, and the norms for the Floor Space Index or Floor Area Ratio prevailing as on the date of this Notification as applicable from time to time.</p> <p>5.3 (iv) Reconstruction of authorized buildings shall be permitted, without change in present land use in consonance with the land use permitted in the local development plan, subject to the local town and country planning regulations as applicable from time to time, and the norms for the Floor Space Index or Floor Area Ratio, prevailing as on the date of this Notification as applicable from time to time.</p> <p>10.3 (i) In order to protect and preserve the 'green lung' of the Greater Mumbai area, all existing and unencumbered open spaces, parks, gardens, playgrounds indicated in development plans within CRZ-II shall be categorized as No Development Zone. A Floor Space Index up to 15% shall be allowed only for construction of civic amenities, stadium and gymnasium meant for</p>

299

recreational or sports related activities and the residential or commercial use of such open spaces shall not be permissible. All proposed reservations in the development plan and encumbered designations shall be developed as per the norms of local regulations subject to the local town and country planning regulations as applicable from time to time, and the norms for the floor space index or floor area ratio as applicable from time to time. 10.3 (iii) For successful implementations of slum rehabilitation scheme in Mumbai the protected structures in viable stretch or slum shall be deemed authorised structures for the purpose of clause 5.2 (ii) of this notification. Or 1. Slum Rehabilitation Schemes: In the greater Mumbai area there are large slum clusters with lakhs of families residing therein and the living conditions in these slums are deplorable and the civic agencies are not able to provide basic infrastructure such as drinking water, electricity, roads, drainage and the like because the slums come up in an unplanned and congested manner and the slums in the coastal area are at great risk in the event of cyclones, storm surges or tsunamis, in view of the difficulties in providing rescue, relief and evacuation. 2. The state government may implement slum rehabilitation schemes as per prevalent local town & country planning norms/regulations including FAR/FSI norms.	39	Pravir Garg (Proprietor) Sunderban Tiger Camp, Kolkata	Definition of Coastal Area as mentioned in the above mentioned draft has to be redefined. NGO & other local private bodies have planted mangrove should be removed from the mangrove area. The clearance permission should be simplified as much as possible & should be done under one roof & minimum expenditure to the stake holder & should be affordable & within the reach. Back water area which is more than 10 km from the CRZ notification should be removed from CRZ notification.	40	Dr. Udaysankar Roy 36 L Mahanirban Road, Kolkata	Throughout the world resorts made in Sea water. Only in India CRZ is Implemented.	41	Nayroh Goa Resort Pvt. Ltd Land situated on cliff with height of more than 15 mts, where the tide level not more than 5 mts & the cliff have the rocky strata starting at average 2 mts. Depth should not be broad under the ambient of CRZ as such area due inherently protected against any coastal hazard. It et.al. A CRZ sett back line of 30 mt may be considered for such areas against of CRZ limit of 500 mt.	42	Tushar Patel, NDZ area should not reduce from 200 m to 50 m in CRZ III. This step will lead to more disturbances to
---	----	--	---	----	--	---	----	--	----	--

	Tamil Nadu, Chennai	<p>coast rather than declaring entire 500 m of sand dunes as no development Zone, Frontier/ primary dunes are more important than any other dunes. These dunes are formed within 100 m from HTL.</p> <p>Temporary construction on silts which can be taken into account to allow construction on sand dunes after 200 mts with option of even lesser FSI.</p> <p>To promote tourism belt of Mahaballipuram –Pondicherry.</p>
43	Dr. A.K. Gupta Joint Director (S) MoEF&CC ERO Bhubaneswar	<p>2.2 CRZ - II: Definition needs more clarity - terms like "close (to shoreline)" & "shoreline" also needs to be defined.</p> <p>2.3 CRZ-III: Land areas that are "relatively"-This needs more elaboration / clarity; with respect to reference point and time.</p> <p>(iii) Prohibited activities: Prohibited in and around of Marine Parks; the area may be clearly defined with respect to the area in which movement of boats / fishing activity are to be banned. No mention has been made with respect to extraction of groundwater through tube-wells in the area.</p> <p>(iv) Permissible Activities in CRZ-II</p> <ol style="list-style-type: none"> i. Construction of buildings for residential purposes, schools, hospitals, Offices, public places on the landward side of the existing road. ii. Subject to permission from local town & Country Planning regularization as applicable from time to time and the norms for the Floor Space Index or Floor Area Ratio prevailing as on the date of this Notification (CRZ Notification 1991 or the present date?) iii. Reconstruction of authorized buildings shall be permitted Without change in the present land use, subject to local town & Country Planning Regulation as applicable from time to time. Clarification may please be made whether the FSI/FAR norms applicable are of the year 1991 or the present regulations. <p>CRZ - III: 1. There is no mention with regard to <u>aquaculture / prawn culture ponds</u></p> <p>2. With regard to extraction of water from the creeks, its utilization and discharge of effluents into the creeks needs to be mentioned in the notification for its regulation. Presently, most of aquaculture farms are drawing water and discharging their used water into the creeks. Clarity is needed on the following issues:</p> <ol style="list-style-type: none"> a. whether drawing water from the creeks and discharging the used pond water into the creeks is a permissible activity if so who is the competent authority to issue permission to draw water from the creeks;

<p>Forest Land: No mention has been made in the CRZ Notification. If any forest land happens to be inside CRZ, due action as per the relevant Act may also be followed.</p>		
<p>New notification draft if implemented will finish the fragile ecology of a small place like Goa, which has already exceeded its carrying capacity. Also the reduction in NDZ to 50 and 20 m without any scientific reasoning, there is no point in having CRZ at all. Protection of human life against the vagaries of nature should be top priority. recommendations for Goa: Under 1 (ii), CRZ must be 100 m or width of the river/creek, whichever is less for rivers and tidal influenced bodies for new constructions should remain as it is as in CRZ 2011 notification. For Sea NDZ should remain 200 m, otherwise it will cause catastrophe and loss of life should a Tsunami strike or a ship run aground. FYI 200 m of Singuerim coast was lost due to grounding of MV River Princess. Under 10.2(ii) CRZ must be 100m of width of river, whichever is less, for new construction. Most of our islands in the backwaters are below sea level and tidal influenced and protected by mangroves and bunds, therefore CRZ must be 100m or width of river whichever less for new constructions as islands being vulnerable is. Entire section 8 V (3) of the CRZ 2011 notification for Goa should remain as it is. Khazan lands ecosystem (low lying eco sensitive areas with its water bodies, which are fish breeding and spawning grounds below sea level protected by unique heritage bund and sluice gate networks) and connected to the sea by sluice gates is a classical example of biodiversity heritage site and being full of biodiversity should remain NDZ and be protected for posterity. No new roads, link roads, coastal roads should be permitted in CRZ I for Goa. With the CRZ 2011 in force, there are hundreds of violations in Goa, one can imagine the violations with the new rules in force.</p>	<p>Matheus Saldanha, Chairperson, St Estevam Biodiversity Management Committee Goa.</p>	<p>44</p>
<p>The draft CRZ notification of 2018 is a focused, schemed dilution of the existing CRZ Notification 2011. The provisions of the CRZ Notification 2011 have not yet been completely implemented in all states due to the delay in the preparation of the Coastal Zone Management Plan. Even before the CZMPs can be approved and implemented, the MoEF&CC has begun diluting the protection that the plans offered. When existing laws call for protection of certain areas like mangroves, salt marshes, intertidal areas etc., the MoEF&CC has opened up these very areas for development and tourism through the Draft CRZ 2018 notification.</p>	<p>Pooja Kumar The Coastal Resource Center Basant Nagar, Chennai 600090 +16 representations</p>	<p>45</p>

		<p>The draft notification is a development, industrialization and urbanisation plan and not an environmental-oriented planning tool.</p> <p>Weakened Setback Lines – The Draft CRZ 2018 notification is an invitation to disaster as it opens up hazardous areas between the High Tide Line and Hazard Line to development. The Draft CRZ 2018 Notification has weakened the powers and protection that set-back lines like Hazard Line offers to coastal areas under the existing CRZ Notification, 2011.</p> <p>The rationale behind demarcating CRZ III A and III B areas based on population density has also not been explained.</p> <p>Permitting Prohibited Activities – The CRZ Notification was originally brought in to protect the coastal ecology and the unique features of the coast, protect coastal livelihoods and to prohibit detrimental activities to the same. However, the draft 2018 notification brings in a number of changes to the clause defining prohibited activities under the CRZ 2011.</p> <p>CRZ 2011 prohibits the “Reclamation for commercial activities such as shopping and housing complexes, hotels and entertainment activities”. This has now been deleted, making reclamation of CRZ areas for commercial activities a permissible activity.</p> <p>CRZ 2011 Prohibits the “Dressing or altering sand dunes, hills and other natural features including landscape changes for beautification and recreational purposes” This has been edited to only include “Active” sand dunes. However, no definition has been provided for what are considered “Active” Sand dunes. This change also means that the protection offered to hills and other natural features of the coast have now been removed, making them permissible activities.</p> <p>Special Consideration to undefined “Defence and Strategic” “Public Utility” and “Security” Projects - The 2018 draft CRZ notification provides a lot of scope for permitting projects that fall within the “Defence” “Strategic”, “Security” and “Public Utilities” categories – However, no definition for any of these words have been provided. The MoEF&CC utilizes this ambiguity to allow a range of exceptions for these projects.</p>
--	--	--

<p>Favouring Coastal Tourism over Coastal Livelihoods – The draft CRZ 2018 notification plays into the coastal tourism agenda of the government by permitting the development of year-round tourism facilities in all coastal states. The intent of the government to shift coastal areas from being livelihood spaces of the fishers and safety buffers for the inland to recreational space for the rich is evident and ill-advised.</p> <p>Favouring Coastal Industrial Development over Coastal Ecology and Bio-Diversity- The draft CRZ 2018 notification relaxes a number of restrictions on the setting up of coastal industries such as Thermal Power Plants, Desalination Plants, Waste Treatment Plants, Non-Conventional Energy Generation etc. that were regulated by the CRZ notification 2011</p> <p>The 2018 notification allows for reclamation of water and bed areas in CRZ IV for construction of industries, ports, memorials, monuments etc. The protection measures that were mandated by the CRZ 2011 including restrictions on development, and mapping of livelihood spaces, fishing grounds, land use and community infrastructure etc have been done away with.</p> <p>Instead of strengthening the law and securing the life and livelihood spaces of the fisher folk, the MOEF&CC is partaking in large scale Ocean Grabbing, promoting the blue economy by bringing in legislative changes, such as the draft 2018 notification that redefine the primary user of the seas.</p> <p>Decentralizing Clearance Procedures – The 2018 draft notification has overturned the entire clearance procedure by granting powers to the state CZMAs and other local authorities, which were till now only a clearance appraising authority at the district and state levels to grant CRZ Clearances.</p> <p>Decentralizing the entire clearance procedures will only lead to a complete collapse in the administration and implementation of the CRZ notification</p> <p>Removing special considerations – The CRZ 2011 provided special considerations to the CRZ Areas like Goa and Kerala, including provisions that restricted setting up structures on the beach; the coastal areas of Kerala and Goa have been opened up for development. These considerations were put in place keeping in mind the unique coastal ecosystems in these areas. By removing these special considerations, the responsibility of the government to prepare special protection plans has been lifted.</p>		
---	--	--

		<p>I on behalf of fishers in India register my total and complete opposition and rejection to this “Draft Coastal Regulation Zone Notification 2018” put out for public comments by the MoEF&CC Government of India. The Ministry is urged to revisit its founding principles and take steps to adhere to their mandate in protecting the environment and the people dependent on the environment instead of paving way for short sighted economic gains by promoting destructive development and tourism on the coast of India.</p> <p>The Ministry of Environment and Forests, Government of India must set aside this “Draft Coastal Regulation Zone Notification 2018” and take appropriate steps in the lawful implementation of the provisions of the existing CRZ Notification 2011.</p>
46	Nikhil Desai Goa 403521	<p>I support and appreciate the efforts put in by Ministry to balance needs of environment and stakeholders. I suggest that some mechanism could be evolved to geo tag all legally approved structures within NDZ so that all illegal structures could be identified and acted upon through GIS systems. All approved tourism structures within NDZ must be permitted to conduct business throughout the year. Further each state must be permitted to develop 5% of coastline for tourism purpose enabling construction of hotels and theme parks etc.</p>
47	Arun Sawhney	<p>This policy will directly affect the Tourism Industry because beyond the No Development Zone (NDZ), up to 500mts from HTL, <u>there is no other activity permitted except Tourism / Hospitality.</u></p> <p>The policy should be actually reversed i.e.</p> <ol style="list-style-type: none"> 1. Land area that are relatively undisturbed, rural coastal area and those that do not fall under CRZ-II, should be designated as CRZ-III and preferred and promoted for development under tourism and allied industries. 2. Such coastal areas, where the population is less than 2161 per sq mts as per 2011 census should be designated as CRZ-III A. <ol style="list-style-type: none"> a) In CRZ-III A, area up to 50 mts from the HTL on the landward side shall be earmarked as the No Development Zone (NDZ) provided the CZMPs as per this notification, framed with due consultative process, have been approved, failing which a NDZ of 200mts shall continue to apply. 3. All other CRZ-III area with population density of more than 2161 per sq mts, as per 2011 census base, should be designated as CRZ-III B. <ol style="list-style-type: none"> b) In CRZ-III B, the area up to 200mts from the HTL on the landward side shall be earmarked as No Development Zone (NDZ).

<p>4. For all tourism projects, on the coastal belt, on a plot size above one hectare should be given the benefit of the proposed reduction of the No Development Zone Area (200mts from HTL reduced to 100mts/50mts); consequently, permitting further ground coverage closer to the water front in these areas, to enable higher realizations and consequently encourage high end tourism projects.</p>	<p>Once status quo doesn't want any changes in the CRZ notification 2011. Because it is in favour of builders & industrialist and not in favour of poor farmers.</p>	<p>Archimind Consultant (Jayesh Tank) Mumbai. 9967695949</p>	
<p>It is proposed to reduce CRZ Restriction to 50 mtrs or width of the creek whichever is less. CRZ restriction on land on Seafont, all CRZ restriction on land on creeks must be scrapped with immediate effect, so that thousands of acres of land will be released for affordable housing - NDA Govt's commitment to the Nation ' Housing for all by 2022'. Public announcement (TOI dated 26th April'18) lifting decades long construction bans on No Development Zone- (NDZS) releasing thousands of acres of land for affordable housing.</p>	<p>Mumbai Development Plan (DP) 2014-34 comes into force a month from the date of notification inviting suggestions and objections within 30 days. The Maharashtra Government never acted so fast - deserves compliment!! 2019 deadline for Navi Mumbai airport tough to meet: Civil Aviation Secy:</p>	<p>Ashwin Parekh <ashwin.r.parekh@gmail.com> m></p>	50
<p>The Idea of having second airport to serve Mumbai Metropolitan Region was first floated in 1990 in view of fast rising domestic passenger traffic with robust two-digit growth. The Point behind highlighting this announcements -- showing Urgency -- is that Maharashtra Government Environment Dept has been sitting on CRZ notification January 2011 for nearly 8 years now. Draft CZMP published in March 2017 is not yet finalized. Union Ministry of Environment kept on giving routinely extension year after year for CZMP. Why no urgency for this most important issue?? The issue of CRZ restriction is even more urgent now as it involves acres and acres of land required to</p>			

		meet Government commitment to provide 'Housing for all by 2022'.
51	V.D. Samant (Secure Enterprises) 9969629798	<p>3.1- CVCA Malvan Achara should be removed from CVCA as sindhudurg is tourist place and no. of visiting tourist are increasing day by day to make a quick arrangement for tourist we must have ease of work.</p> <p>7(iv) self-dwelling units total built up area of 600 sq. mts, instated of mentioned 300. [Built of 600 is appropriate for joint family of 6 brothers so that they will get 100 sq.m each] and approval shall be accorded by the concerned local authority without the requirement of recommendation of CZMA.</p> <p>Repairs and housing for self –accommodation should be out of CRZ clearance.</p> <p>CRZ III A- criteria of population density should be more than or removed.</p> <p>Islands along the mainland coast: no new construction should be permitted. Either New construction of 50sq mts. Size of only ground floor should be allowing for locals, Original communities.</p> <p>Drawing of ground water should not be allowed to use by other means also.</p>
52	M/s. Standard Metalloys Private Limited Rohit Pandey	<p>Include the following provision in Para 5.4 of the draft CRZ notification: <i>“Mining of minerals as specified in First Schedule of OAMDR Act, 2002, occuring as such and other minerals found in association with such minerals.”</i></p>
53	Krishnamurthy B N cell 09845345711 LL 91-80-26713646 email:krishnamurthybn12101941@yahoo.com	<p>Para 4. Include ship breaking activity</p> <p>Para 4 vii Prohibits ports and harbours in high eroding stretches of coast. This will be in conflict with paras 5.1.2. (ii) (a), 5.4. (ii) (a) and 5.4.(iii), for interpreters. High eroding areas is objective. The best or worst example is Chennai port.</p> <p>As other paras take care of ports and harbours, provision at para 4. vii, could be considered for deletion.</p> <p>Para 5. 1.2. (vii) Remove fish drying. It is a big source of contamination and pollution. All fish drying activities to be outside the 500 m zone. Fishermen want to dry the fish almost at their doorsteps. Presently it is free for all. In some cases, entire fishery harbour area and near shore, are used for fish drying. There will be resistance from fishermen groups. But we have to make progress in achieving cleanliness and hygiene. We need to stop developing new areas for fish drying within 500m and persuade the fishers to shift the existing drying activity outside the 500m zone.</p>

<p>Para 5.1.2. (i) (a) Specifically mention fishery harbours and Recreational (Tourism) harbours.</p> <p>Para 5.2. (vi) and 5. 3. (ii). (g) Providing for temp shacks etc. will contribute to a lot of pollution and contamination of beach and waters. It would be extremely difficult to regulate these facilities without causing damage to environs.</p> <p>It is advisable to provide for regular construction, which can be cleaned and maintained, with proper treatment facilities. Cleanliness cannot be maintained with temp structures. If facilities are clean, more tourists also will be attracted.</p> <p>Annexure IV, 3 (i) For maps, vertical reference is taken as MSL. Either make the vertical reference as chart datum, as the entire marine structures as well as navigation, will be referenced to chart datum OR link MSL with Chart Datum. Chart datum if readily not available, can be calculated, searching for lowest tide in the available past records (19 years, if available)</p>	<p>Antony, A.D. Adichilli House, Kothad.P.O. Ernakulam, Kerala. 682027</p>	<p>54</p>
<p>I live in Kothad, Kadamakudy village, Kerala. Our place is of marshy lands and paddy fields. I have only 4cents of land which I got from my father as hereditary. I have no other land. The authorities have not given me consent to construct a house citing CRZ rules. This situation is giving us severe mental stress.</p> <p>1. Give complete exemptions to those who live in such places from their birth or for a long time. 2. Permit those who have got land as hereditary to construct houses. 3. Area of construction may be limited to below 200sq.m. Or so.</p>	<p>Mr. Rahul Aggarwal Group Managing Director Gurgaon - 122001 T: +91 1244105154 E: rahul@theagroup.com</p>	<p>55</p>
<p>Para 5.1.2. (i) (a) Specifically mention fishery harbours and Recreational (Tourism) harbours.</p> <p>Para 5.2. (vi) and 5. 3. (ii). (g) Providing for temp shacks etc. will contribute to a lot of pollution and contamination of beach and waters. It would be extremely difficult to regulate these facilities without causing damage to environs.</p> <p>It is advisable to provide for regular construction, which can be cleaned and maintained, with proper treatment facilities. Cleanliness cannot be maintained with temp structures. If facilities are clean, more tourists also will be attracted.</p> <p>Annexure IV, 3 (i) For maps, vertical reference is taken as MSL. Either make the vertical reference as chart datum, as the entire marine structures as well as navigation, will be referenced to chart datum OR link MSL with Chart Datum. Chart datum if readily not available, can be calculated, searching for lowest tide in the available past records (19 years, if available)</p>	<p>The draft CRZ notification 2018 in Para 4 provides a list of prohibited activities within CRZ and in clause (viii) lists mining of sand, rocks and other sub-strata minerals as a prohibited activity. However, a list of permissible/ regulated activities in specific CRZ categories viz. CRZ-I, CRZ-II, III & IV is provided in Para 5. and though mining of atomic minerals notified under Part-B of First Schedule of Mining and Minerals (Development) Act, 1957 occurring as such or in association with one or other minerals has been made a permissible activity in CRZ-I, CRZ-II and CRZ-III, the same has been in advertently omitted/missed under CRZ-IV which was hitherto a permitted activity even in Notification dated 06.10.2017.</p>	

		<p>Include the following provision in Para 5.4 after clause (ix):</p> <p><i>“Exploration and mining of atomic minerals as specified in Part-B of the First Schedule of the MMDR Act, 1957 and any other mineral found in association with such atomic minerals or otherwise.”</i></p>
56	<p>Aarti Ramani projectsalphaenvirons@gmail.com Ajmera Realt & Infra India Ltd.</p>	<p>It is fine that buffer zone for the creek has been restricted to 50 mts. The unnecessary and restrictive CRZ buffer limit along the nallas beyond 500m/50m CRZ buffer, where Municipal Corporation of Greater Mumbai has already trained or has granted permission for training the nallas, be removed.</p>
57	<p>Meenakshi Kapoor and Kanchi Kohli, Centre for Policy Research (CPR)-Namati Environmental Justice Program Dharma Marg, Chanakyapuri New Delhi- 110021</p>	<p>Reduction and relaxations in the zones will alter the present land use such as fishing areas, fish drying and boat parking sites, salt marshes and grazing lands available for commercial and industrial development.</p> <p>Removal of protective/preventive clauses could disturb the natural course of seawater.</p> <p>Arbitrary decentralisation and re-centralisation of power, the state level bodies have been kept out of decision-making for CRZ I and IV areas is unclear.</p> <p>The draft further states that self-dwellings of less than 300 sqm area can be granted approval by the respective local authority without the involvement of the State CZMA. While decentralisation has been attempted by empowering the local bodies to grant clearance to self-dwellings, coastal review of such projects has been bypassed in the name of avoiding hardship to coastal communities.</p> <p>Similarly, all powers to demarcate the High Tide Line and Low Tide Line, which are the primary reference lines for demarcating the CRZ and different sub-zones in it have been concentrated with the National Centre for Sustainable Coastal Management (NCSCM). While to avoid inconsistency in tidal demarcation across the coast, the states had requested guidance and support from the Centre, the Centre has responded by reserving the authority to demarcate tidal lines only with the NCSCM.</p> <p>Unacknowledged and unrealised role of the District Level Coastal Committees (DLCC) Regarding the enforcement of the notification, the draft suggests that the state governments can delegate such responsibility to the level of district magistrate. DLCCs, which were created under the CRZ</p>

58	Mr.Ravindra Bhowar	<p>Notification, 2011 as a district level institution for regulation of the coastal development with community participation, have not been commented upon. Creation of district level committee was a big gain made during the transition from CRZ 1991 to CRZ 2011. In fact, appraisal of self-dwellings could have also had the involvement of DLCCs. States such as Goa and Kerala, after realising the need for a district level coastal body, only recently have initiated the process of their constitution and their involvement in project appraisal. To uphold the true spirit of decentralisation where communities living on the coast can take part in decision-making, it is important that the DLCCs are made active. Involving DLCCs in implementation of the Notification not only helps State CZMAs keep a closer watch on CRZ compliance, but also add to the available human resources for the task.</p> <p>Implications of hurried and exclusionary CZMP preparation</p> <p>The Draft CRZ Notification 2018 suggests that the notification would come in force after the Coastal Zone Management Plans (CZMP) made under CRZ Notification, 2011 are revised according to this draft notification. However, the draft notification doesn't take into account the following:</p> <p><i>States are still struggling to complete CZMPs</i></p> <p><i>Compromised public participation in CZMP preparation</i></p>
59	Bharatkumar Patel (Architect & Chartered	<p>5.3-ii-a - Please define 'Traditional coastal communities' Can a person be residing in Mumbai kolivada, construct dwelling unit anywhere in CRZ area in India</p> <p>5.3. ii. f -Allow restaurant in Temporary Shacks</p> <p>5.3.ii.g - Please mark entire CRZ area as Tourism zone in CZMP plan and allow construction strictly as mention in said notification.</p> <p>5.3.iii.b - Please define Ambit of traditional rights. Allow non local Indian to construct farm house beyond NDZ with traditional look on 10% land with 15% FSI with not more than 9-meter height(Gr+1).</p> <p>7.iii - CZMA shall offer clearance on the basis of plans forwarded with report by local town planning authority/municipal corporation in CRZ II & III.No need of presentation in front of committee. Consultant charges exorbitant on the name of committee and officers.</p> <p>8. i. e - No need of Agencies for demarcation of HTL once HTL shown in CZMP which shall be made available with concern planning authorities.</p> <p>8.i.g - Radius of 1KM is enough.</p> <p>As per letter dated 19/1/2000 issued by Ministry of Environment vide which it approved CZMP of Mumbai says that the 50 M wide buffer zone shall not be required on landward side in private land</p>

	Engineer)	<p>provided there is existing road between mangroves and private land. The MCZMA and Hon'ble Bombay High Court accordingly granted their permission to Viral Co-operative housing society and Kavya Beach Co-operative housing society, Kandivali (West), Mumbai on 5/1/2013 and 6/2/2013 respectively.</p> <p>For protection of mangroves in government land, the buffer zone should not be shown in adjoining private land otherwise it reduces its value to nil.</p> <p>You are therefore requested to include the above said two circumstances in paragraph 1.1 (ii) (a) and (b), Annexure – I, at page no.- 19 of draft CRZ – 2018 notification.</p>
60	Tamal Taru Das Mahapatra Kanthi Mahakuma Khoti Matsyajibi Union(KMKMU), Mob- 9434218438 +1 representation	<p>The draft CRZ Notification, has not consulted the small and traditional coastal fishing communities though they are by far the largest primary stakeholders and natural custodians of our coastal resources;</p> <p>The MoEFCC, by publication of the instant Draft CRZ Notification only in English.</p> <p>The draft has failed to mention that the violations of the regulations contained CRZ in 1991 and CRZ 2011 will continue to be booked under the proposed CRZ 2018.</p> <p>Draft has been published without finalisation CZMP as per 2011 Notification.</p> <p>Government of India in the Ministry of Environment Forest and Climate Change is requested to rescind the instant draft CRZ Notification 2018 and take immediate steps towards enactment of a comprehensive Coastal Regulation Zone ACT, as promised by the then Environment Minister Sri Jairam Ramesh in January, 2011. The Act is to be prepared through open and appropriate consultation with the coastal fishing communities and concerned citizens and should be based on sound scientific, environmental and social principles with the aim the protect both coastal natural resources and sustainable livelihood practices dependent on those resource.</p>
61	Satheesh Kumar (Jhatka.org)+ about 600 other emails	<ul style="list-style-type: none"> • The draft is a focussed and schemed dilution of CRZ, 2011. • It should be enacted as an Act of the Parliament and not as a Notification by the Ministry. • The draft should have been issued after finalisation of CZMPs. • Ecologically sensitive areas have been opened up for development and tourism, which are not in the interest of coastal environment. • The draft is a development, industrialisation and urbanisation planning and not environment

305

	62	<p>The draft opens up hazardous areas between HTL and the hazard line for development.</p> <ul style="list-style-type: none"> • The draft permits many of the prohibited activities under the CRZ, 2011 and provides special considerations to various sectors. • It favours coastal tourism over coastal livelihoods. • Vacant coastal areas are traditionally used by small scale fishing communities. Instead of recognising and securing these areas, the Notification effectively aims at real estate development. • The draft favours coastal industrial development over coastal protection of coastal ecologically and biodiversity by permitting activities in CRZ-I-A. • The draft promotes development in water areas without the understanding of fisheries. • Granting clearance without the proposal and CZMA for self-dwelling, houses with less than 3000 sq. ft. area will potentially lead to a boom in real estate, Revenue Authorities are not equipped to perform the function of environment protection. • Special considerations to Goa and Kerala have been done away and the coastal areas have been opened up for development.
63	<p>In CRZ- III area, landward side of existing old road to be allowed for building construction as allowed in CRZ-II area.</p> <p>Considering geography of Kerala with lot of river flowing all over the place. Even through rivers are many kilometers away from the sea. Rivers are also considered for CRZ. Due to CRZ clearance lot of constructed building are hold and awaiting CRZ clearance. At least provide construction clearance for building at landward side of existing road situated near river.</p> <p>KCZMA is developing CRZ map without considering the river salinity level. This create lot of area where river is located are coming under CRZ non development zone.</p> <p>Considering the geography of Kerala, please limit 15mtr form river as NDZ (Non development Zone) and allow construction at landward side of existing road near river.</p> <p>Authority has to take a step to approve already constructed building, constructed based on panchayath approval. Most of the cases panchayath give NOC for construction and after construction panchayath deny to issue number the build, stating CRZ clearance. Due to un-awareness of the local authority (panchayath) citizen are suffering. This scenario creates lot of concrete waste and landfill. This is more dangerous than allowing construction in CRZ area. I request authority to consider regularizing those building start construction based on panchayath approval with small fee penalty.</p> <p>Diu should be declared as Island just like Andaman & Nicobar & Lakshadweep and NDZ should be kept</p>	<p>Zafeer PV Omerkahayam Thalassery Kannur-Kerala 670102</p> <p>Mr. Kirti D. Vaja</p>

	State Vice President BJP, Daman & Diu Pradesh	for 20 mts from HTL.
64	Ashvini Bharat Bamania Vice President-cum- Councillor District Panchayat-Diu +1 representation	Notification dated 1996 classified the Malala to Nagoa tourism area as CRZ IV wherein beyond 60 mts is permissible for the construction. In accordance of the above CRZ Notification, the DDCZMA Daman had prepared a Draft CRZ map in which tourism area of Malala to Nagoa classified in CRZ-III. In this Draft CRZ map have strong objection and suggested that the said tourism development zone of Malala to Nagoa are is required to be classified in CRZ-II. (According to old CRZ IV)
65	Shashikant M. Solanki President cum chief Counsellor Diu	Diu district should be declared as island like Andaman & Nicobar and Lakshadweep and NDZ should be kept for 20 mts from HTL.
66	Bipin Shah President Diu District BJP- Diu	Diu should be declared as iland just like Andaman & Nicobar & Lakshadweep and NDZ should be kept for 20 mts from HTL.
67	Kurian George Mumbai	This feedback is regarding the definition of the Zone in para (ii) "CRZ shall apply to the land area between HTL to 50 mts or width of the creek". This should be re-phrased as an additional clause, especially since the definition of creek includes bays. i.e. In addition to the 500 mts from HTL main clause, the Zone will also include land area up to 50 mts from the creek, beyond the 500 mts. This will be in sync with your stated objective "to conserve and protect the unique environment of coastal stretches and marine areas". Please note that the inclusion of "bays" in the 2011 version has been exploited to bypass the 500 mts Zone limit. The least you could do is eliminate "bays" from the definition of creeks
68	Jagdish Khanna 187, Samudra Darshan, Near Goa University, Bambolim, Tiswadi,	In addition, the local residents in coastal villages need to recognize and be supportive of coastal tourism success since it would significantly improve their personal livelihood in the area. <u>Suggestion 1:</u> The location and implementation of "No-Development Zone" (NDZ), as currently defined and exists in

<p>the coastal area, needs to be fine-tuned with respect to the specific nature of the coastal area as related also to the "terrain" of the said coastal land specifically with respect to adjacent hillside areas for consideration of the specific aspect and location of the NDZ area in the said location.</p> <p>Specifically, in a hillside-related coastal area, the said hillside location needs to be considered for the valid NDZ of that area being the valid closest to-the-beach location of the desired resort/hotel. As such, if the said hillside terrain for a CRZ-III B related resort is located within the currently defined NDZ of the area between the High Tide Line (HTL) and the 200 meters landward related NDZ boundary, its location must be considered to reduce the preceding 200 meters NDZ line to the valid NDZ being less than 200 meters from the HTL location being up to the start of the said hillside on the coastal plot. For example, if the said hillside starts from 80 meters on the landward side distance from the HTL, the said NDZ area for the CRZ would be the same 80 meters rather than the normal 200 meters from the HTL.</p> <p>However, with respect to the construction of the specific location of the considered coastal resort, the prohibition of the "cutting" of a hillside area for any construction purpose, will enable the said resort to be located and built on the flat area on top of the said hillside even if that said flat area point is less than 200 meters of the previous non-hill considered HTL.</p> <p><u>Suggestion 2:</u></p> <p>Another area of consideration for the "comment/suggestion" concerns the definition and description of a "creek" versus a "nullah" in view of the presence of the said creek within the 500 meters of HTL where a 50 meters' line from the HTL or the "width of the creek" whichever is less, defines the boundary of the NDZ for the closest beachside location of a coastal resort/hotel. A "creek" is defined as a flowing water body which in the above respect is in the coastal area. If the so called "nullah" has the following condition: it is within the coastal 200 meters HTL area, while also being of 4-5 meters depth, and having flowing water in it being from underground related agriculture/undeveloped land and rainfall sources and flowing parallel on the beachfront coastal land until after an extensive length it enters into the sea, can the said "nullah" be considered equivalent to a "creek".</p>	<p>Goa-403206 Tel.: 98221 00700</p>	<p>69</p>
<p>Our Trust represents the residents from Guzdar Scheme in Santacruz West, Mumbai in matters that affect their common civic related issues & interests affecting them adversely.</p> <p>We consider our duty to apprise you of very serious FLOODING, even in DRY spell in certain High Tide duration of entire locality comprising of nearly 300 residential buildings. The condition in</p>	<p>Guzdar Scheme Residents-Trust Charitable Public Trust Mob:9821057171</p>	

	9820545889	'monsoon' is undeniable hardships to thousands of residents.
70	Sunil B Shah, DGM (Projects) Ajmera Realty & Infra India Ltd, Andheri (W), Mumbai-400053	Restrictive CRZ buffer limit along the nallas beyond 500m/ 50m CRZ buffer, where municipal corporation of greater Mumbai has trained or has granted permission for training the nallas buffer within City limit should be removed.
71	BNHS, Bombay Natural History Society Mumbai, Maharashtra India	<p>The land area between HTL to 50 mts or width of the creek whichever is less... should not be consider.</p> <p>No need for classification of CRZ-III A and B and suggest retaining current 200 m NDZ in high habitation areas and increasing NDZ to 500 m in un-inhabited areas as a precautionary principle.</p> <p>Include coastal and marine important Bird areas (IBAs), mudflats and sandy shores that are vital in light central Asian Flyway and migratory birds as ESA.</p> <p>If the road passing over/through marine ecosystems (built for strategic needs), compensatory areas with the similar ecosystem characters be designated as ESA within the same state (similar to land for land provision under Forest Conservation Act)</p> <p>Windmills or other non-conventional energy sources and associated facilities should not be permitted in inter-tidal areas.</p> <p>CRZ -I B (iv) storage of non-hazardous cargoes edible oil, fertilizers & food grains in notified ports and (ix) Treatment facilities for waste and effluents and conveyance of treated effluents (xvi) weather radar for monitoring of cyclones movement and prediction and associated facilities not need to be included or amended. (xviii) desalination plants and associated facilities could be incorporated but beyond the HTL, but only inlet and outfall facilities for desalination plants.</p> <p>5.2 CRZ-II Activities as permitted in CRZ-I B, shall also be permissible in CRZ-II, should not be as it is basis. There should be which is permissible and non-permissible.</p> <p>5.2 CRZ-II (vi) Temporary tourism facilities should be beyond the NDZ.</p> <p>5.3 CRZ-III (i) Activities as permitted in CRZ-I B, shall also be permissible in CRZ-III, should not be on as it is basis.</p> <p>5.3 CRZ-III (b) (c) (d) (f) (g) should not be permitted in NDZ</p> <p>CRZ III areas beyond the NDZ (e) Limestone Mining permitted only beyond 500 m on precautionary principle.</p>

<p>5.4 CRZ-IV (xiv) Construction of memorials/monuments and allied facilities by the concerned State Government in CRZ-IV (A) areas, in exceptional cases, with adequate environmental safeguards (suggest be dropped completely).</p> <p>CRZ clearance for permissible/regulated activities- Delegations (ii) (iii) (v) (vi) this provision has far reaching negative consequences and those in many cases will be irreversible. Thus a thorough scrutiny and due diligence cannot be circumvented for short-term benefits.</p> <p>CVCA's also include mudflats, coral reefs, sandy shores, rocky shores, coastal plateaus, sand dunes, salt pans etc. This also should include key sea turtle and Horse-shoe crab nesting areas.</p>		
<p>The new notification issued by the MoEFCC on April, 2018, in lieu to the existing CRZ notification is a commendable effort by Dr. Shalish Nayak.</p> <p>The demands of the fishing community are kept in mind while preparing the draft. Relaxation of the CRZ norms for construction of jetties and houses close to the sea as requested by the fishing community were incorporated in the draft.</p> <p>Opening up the coasts will provide huge employment potential to the massive population. It is great way to relieve unemployment problem plaguing the country for decades. It encourages investments and thus contributing to development of the region.</p>	<p>Puppala Sai Perumalla Ravindra</p>	72
<p>The DRAFT Coastal Regulatory Zone NOTIFICATION 2018 IS VERY GOOD. The tourism industry will improve. Please issue final revision and help the Tourism Industry.</p>	<p>A V Ranganatha Cell 99490 42551 Tirumalnagar, Visakhapatnam-530 046</p>	73
<p>(i) CRZ I and HTL by using only satellite may not be accurate it needs to be supplemented with ground truthing, to minimise errors.</p> <p>2.1.1 (a) (i) Mangroves that are smaller than 1000 sqm also require buffer zones around them. Prioritising of rights and livelihoods of traditional coasta communities particularly in CRZ I areas need to be addressed.</p> <p>Development of new ports and expansion of existing ones needs to be done only while safeguarding local</p>	<p>Chetan H.C, Assistant Professor Bengaluru 560 064, India Mobile: +91-9663877113</p>	74

		<p>fishing community's rights.</p> <p>5.1.1. (i) Ecotourism activity is a permissible activity that regulations can address that what type of activities will place here, as well as the time, season, area and no. of people allowed per day.</p> <p>5.1.1 (ii) for pipelines and transmission lines 2.2.2. (a) (i) a buffer zone of 10 m should be maintained. These permissible activities need to be done beyond this.</p> <p>5.1.1. (iii) District level communities of the area chosen for compensatory plantation should be involved.</p> <p>5.3. (f) in CRZ III B, these (toilets, changing rooms etc.) permission be withdrawn unconditionally.</p> <p>5.4 (xiv) construction of memorials/ monuments should not be allowed in CRZ IV-A.</p> <p>1(ii) & 2.3.3 the CRZ "will apply to 50 m along the tidal influenced water bodies". Include on both sides along the tidal influenced water bodies"</p> <p>2.1.1 (b) & 6 (i) EMP, CZMP etc. must have specific deadlines for preparation and submission of the same.</p>
75	<p>Palghar, Maharashtra + 53 representations Vadarai Machchimar Sarvoday Sahakari Society Ltd.</p>	<p>Draft relaxes restriction on activities detrimental to coastal environment.</p> <p>Small and traditional coastal fishing communities were not consulted.</p> <p>Draft was published only in English.</p> <p>Draft does not mention that violations to earlier CRZ Notifications will continue to be booked under the proposed CRZ, 2018.</p> <p>As directed by NGT, CZMPs should have been finalised first.</p> <p>Draft should be rescinded and a comprehensive Coastal Regulation Zone Act must be enacted.</p>
76	<p>Lala Dhas K P Laladhas CSEIBA Center for sustainable Environment-India Biodiversity Action Kerala</p>	<p>(i) "..... the HTL means the line on the land upto which the highest water line reaches during the spring tide, as demarcated by the Notified agencies and verified by the National Centre for Sustainable Coastal Management (NCSCM)..."</p> <p>(ii) 2.3.1 ,2.3.2 and 2.3.3 may be deleted and replaced by "Area upto 200 m from HTL on the landward side in case of seafront and 50 meters along tidal influenced water bodies or width of creek whichever is less is to be earmarked as NDZ."</p> <p>(iii) 5.1.2 (viii) Existing fish processing units may utilize 25% additional plinth area for modernization purposes... to be deleted because they are polluting the beach and nearshore waters.</p> <p>5.3 (ii) (f) Wherever there is a national or state highway passing through the NDZ of CRZ-III areas, temporary tourism facilities such as toilets, change rooms, drinking water facility and temporary shacks can be taken up on the seaward side of the road.</p> <p>On landward side of such roads in the NDZ, Resorts / hotels and associated tourism facilities shall not be permitted</p>

77	<p>My first objection is that the setbacks mentioned have no scientific basis. I can provide a detailed explanation of the same 690445612470 UID David Dsouza</p>	<p>This unscientific demarcation maybe followed in states where govt is the landlord but in Goa land is not. The Portuguese system of land holdings is still followed. I am not saying the setback should be reduced or increased bit should have covered under the principals of coastal processes, i.e., land influenced by tidal action up to 500m from the HTL (perigenic spring adjusted for global warming) on the landward side and till 12m now taken as 12 nm from the LTL (P. Spring) though coastal processes are prevalent till 12-meter depth. (Tidal action including wind affects the bottom till this depth).</p>	<p>One of the objectives of the draft CRZ Notification, 2018 is to give livelihood security to the fisherman and local communities. However contrary to objective, fish processing activities/plant is not allowed in draft CRZ Notification, 2018. Relaxation is given to existing fish processing plants for their expansion. However, new fish processing plants and expansion of ongoing fish processing plants are not made permissible. Fish processing need to be allowed in fishing zone marked in the Development plan. Draft CRZ notification is against the local planning of the State Government of Maharashtra. Consider the rights and livelihood security of the local people residing in the coastal areas.</p>	<p>80</p> <p>Guddekopla Sharat Dakshina Kannada Mogaveera Hithasadhana Vedike (representation from Udupi, Karnataka Fisherman)</p>
78	<p>Javed Thakur Small Scale Industries Association, Ratnagiri, Maharashtra</p>	<p>Exemption from CRZ clearance in respect of Kharland scheme in Maharashtra state. To repair/ reconstruction/ renovation of Kharland schemes if the alignment of the scheme passes through mangrove areas or is likely to damage the mangroves a minimum two times the mangroves area affected /destroyed / cut during the construction process shall be taken up for compensatory plantation of mangroves. Clause no. 5.1.2 CRZ IB- The inter tidal areas (f) Measures to prevent sand bars, installation of tidal regulators, laying of storm water drains or structures for prevention of salinity ingress such as Kharland development schemes (Constructed as per the Maharashtra Kharlands Development Act 1979) and fresh water recharge.</p>	<p>79</p> <p>Manisha Sawant Water Resource Department, Mumbai</p>	
80	<p>Guddekopla Sharat Dakshina Kannada Mogaveera Hithasadhana Vedike (representation from Udupi, Karnataka Fisherman)</p>	<p>Fisherman are facing hardship due to the restriction on construction of houses in CRZ III area with reference to draft CRZ notification, 2018, 2.3.1. CRZ-III A. No development zone should be reduced to 50 mt from the HTL in case the density of population is more than 2161 per sq km, but most of the coastal villages are developed, but density of population is lesser, exempt the density clause. 2.3.2 CRZ III B. permits the construction of fisherman dwellings in NO Development Zone.</p>	<p>80</p>	

81	John Kurien Ph. D Visiting Professor Azim Premji University Bangalore	<p>New CRZ notification not in favour of fisher folk and the state of the coastal ecosystem.</p> <p>Removing this preamble and opening the ecologically sensitive CRZ- I to tourism activity and the sub-classification CRZ -III and IV reveal a total change of mindset.</p> <p>Encouraging mindless expansion of physical structures on the coast, through initiatives like the ambitious Sagar Mala Project, by the dilution of the CRZ notification in the above matter, will be self-destructive.</p> <p>The attempt to dilute the extent of the 'no development zone' -- even in the guise of providing housing for the fishing community -- is a regressive measure as it will only reduce the sand area of the coast and this will in the long run cause untold damage to the very infrastructure which is build using this dilution of the NDZ.</p>
82	DEEPAK VICHARE (EX--PLANNING COMMITEE MEMBER MRTP)	<p>2.3.2 CRZ-III B</p> <p>Area upto 50 mts. from the HTL on landward side shall be earmark as the no development zone (NDZ). Thereafter development of vacant plot in C class tourism village, approved by Maharashtra tourism corporation shall be permissible.</p> <p>Area upto 50 mts. from the HTL on land ward side shall be earmark as no development zone. There after development of vacant plots for construction and reconstruction of existing dwelling units shall be permitted with additional FSI to local farming inhabitants, those who are having their old settlements.</p>
83	Rahul shah	<p>1) Clause no. 5.2, sub clause (iii) & (iv) : Development and redevelopment of buildings / plots falling under CRZ - II should be allowed to be redeveloped in accordance with the F.S.I and F.A.R. in accordance with the local town and country planning regulations as applicable from time to time as opposed to being limited to the norms prevailing as on date of this notification as any improvements / rectifications to the aforesaid regulations subsequent to this notification will then not be applicable to plots falling under CRZ- II.</p> <p>2) Clause no. 10.3, sub clause (i) : Plots falling under the CRZ within municipal limits of Greater Mumbai which have been encroached upon by slums, or having cessed or dilapidated structures on them, but otherwise reserved for open spaces, parks, gardens, playgrounds in the development plans should be allowed to be redeveloped, subject to 20% - 30% of the plot being utilised for their respective</p>

<p>reservations and not just categorized as NDZ. This will help preserve the "green lung" of the city by creating open spaces/ gardens on plots which will otherwise continue housing slums and/or old dilapidated and dangerous structures in perpetuity.</p>	<p>Exploitation of coastal aquifer leads to salinity ingress in the coastal areas.</p> <p>Mapping of the coastal aquifers needs to be incorporated as one of the important features of coastline Stringent mining laws to prevent over exploitation or mineral mining (ex. Forous limestone, placer deposits) of aquifer to prevent salinity ingress problem in the coastal region. This in turn has repercussions in the agriculture sector along the coastline.</p> <p>CRZ should mention about the ecological flow required to maintain the coastal ecosystem services like mangrove health, fishery breeding and others.</p> <p>Construction of large dams in the upstream and non-release of water alters the estuarine dynamics.</p> <p>There is no mention of estuary and clarification on its status.</p> <p>Specific comments</p> <p>In CRZ I area the mangroves extent into the creeks and other areas, is this accounted.</p> <p>CRZ III - Criteria for deciding on the population density of 2161 per sq. km is not clear.</p> <p>Point 5.1.1 no. iii: Permission is available for public utilities and this need to be clarified. The allowable public utilities need to be defined properly otherwise the hotel industry can misuse the same.</p> <p>Land reclamation is suggested and the area declared as CRZ I -B is the intertidal area which is the interphase between the marine processes and terrestrial systems. It is suggested that need of the expansion or creation of any intervention should be studied before permission is granted.</p> <p>There is provision for construction of non-conventional energy sources in the CRZ I B. However, along the coastline there is presence of good bird diversity and wind farms are detrimental for the birds. Such areas should be marked out by the National agencies like BNHS or WII and proposed for conservation.</p> <p>Norms for exploration of oil and natural gas with fewer disturbances to the coastal and marine life should be proposed. Upgradation of techniques for exploring in sensitive areas should be mentioned.</p> <p>Clarification require for definition of "local communities" Who are they locals villagers, tribes, fisherman or local urban dwellers of local industries? –</p> <p>There are issues of migrants- need to define locals community based on their traditional houses (ex those who are staying prior to the independence can be considered as locals) or only listed tribes and fisherman should be considered under these.</p>	<p>84</p>	<p>Dr. Deepa Gavali Acting Director Gujarat Ecology Society 3rd floor Synergy House, Subhanpura Vadodara, Gujarat (o) 0265-2283329/41 (m) 9724859988</p>
<p>Give back to CVCA (Zone V) rights of Mannar as per CRZ 2011 in CRZ 2018 to save the coastal inhabitants, Marine Biosphere and IMPS to be made in Consultation and detailed discussions</p>	<p>Fatima Babu</p>	<p>85</p>	<p>Fatima Babu</p>

		with the stakeholders/ Coastal representatives considering the present and future needs as intended by the Coastal Regulation Zone Notification.
86	AR Aqua Farm toPlate... Fleshy Taste Rajanish Mahagaonkar	Add the re- circulating aquaculture system in the CRZ permissible activities under CRZ- IB/ CRZ-II & CRZ III. (b) Agriculture, horticulture, garden, pasture, parks, playfields, forestry & re- circulating aquaculture system. facilities required for local fishing communities such as fish drying yards, auction hall, net mending yards, traditional boat building yards, ice plants, ice crushing units, fish curing facilities & re- circulating aquaculture system.
87	Tuty cssf cssftuty@gmail.com Coromandel Social Service Forum Victoria Street, Thoothukudi	The Coast of Gulf of Mannar in Tamilnadu, an ecologically sensitive biosphere approved by UNESCO (MAB Program) is divided into multiple smaller fragments like CRZ I (IA- IB), CRZ II, CRZ III (IIIA/IIIB), CRZ IV (IVA, IVB) covering the districts of Rmanathapuram, Tuticorin, tirunelveli, Kanyakumari and new clauses are added to relax permissible activities in CRZ areas. This division and relaxation has invariably paved way for the exploitation of the coast. Kindly remove such detailed fragmentation and relaxing clauses for the Coast of Gulf of Manner. The Gulf of Mannar, a Marine Biosphere, falls under CRZ I in total and not CRZ IV (A/B) as reflected in the 2011/2018 mapping. Kindly plot Corals, Pearl Banks, fish breeding and fishing zones in maps, and also retain pollution mapping of the sea as per CRZ 2011 in CRZ 2018 Notification.
88	Vicky tricks	Draft Coastal Regulation Zone Notification, 2018 is very helpful for growing economy of India. It will be milestone in sustainable development of the country. It will not harm environment at all. It is wise decision to change CRZ 2011 with CRZ 2018. I welcome the draft by heart.
89	K. Venkatesh Kini. S/o Late K. Sadananda Kini, "Vrindavana" Bankeshwara Road, Byndoor Post, Byndoor Taluk, Udupi Dist- Karnataka, 576214.	The Someshwara Beach (Ottinene-beach) a famous tourist spot. The beach is a non hazardous beach. Anticipating major amendments in CRZ norms and happy to know that the area of No Development Zone will be restricted to 50 mtr. But the draft CRZ regulation has disappointed us once again by inserting a condition that to have 50 mtr No Development Zone the population of the area shall be above 2161 per sq. km. as per 2011 census. This is a big hurdle for development of this beach. Even though it is internationally famous it was not yet developed due to inclusion of this area in the CRZ-III by mistake in the 1991. If it was in CRZ-II, which it ought to be, it would have already a developed beach and will be having density of population above 2161 per sq. km. Even as per present draft regulation clause

<p>2.3.1. it would again come under CRZ-III and this area will remain undeveloped though having famous beach with excellent opportunity for tourism development.</p> <p>Include the entire Paduvaray Village in the CRZ-II or in the alternative remove the criteria of having density of population above 2161 per sq. km. as per 2011 census and thereby promote the development of this area.</p>	<p>Mining of atomic minerals should be permissible activity in NDZ under Para 2.3.3.</p> <p>Mining of atomic minerals may be permitted selectively in CRZ-I A under Para 5.1.1 with a clause for compensatory plantation of mangroves.</p> <p>Mining of atomic minerals including beach and sand minerals (Ilmenite, Rutile, Zircon, Monazite, Leucocene, Sillimanite and Garnet) to be specified under various clauses under which the activity is permissible including CRZ-IV A for imparting better clarity.</p> <p>For project attracting both CRZ as well, EIA Notification, Rapid EIA may be prepared based on TOR issued by the EAC or SEAC under EIA Notification.</p> <p>In Para 1.9 (ii) (a) of Annexure-I, mining of atomic minerals may be permitted occurring as such or in association with other minerals.</p> <p>Under Para 3 (H) of Annexure-V in context of mining proposals, the following details should be obtained from the Proponent:</p> <p>Government order for mining lease/exploration/production lease approved mining plan details, extent of mining lease area, capacity of mining, type of minerals to be extracted and end use of the mineral.</p>	<p>AV Bait At post, Shivaji chowk, Guhagar, Ratnagiri Maharashtra</p>	<p>91</p> <p>Objection in CRZ III A definition</p> <p>CRZ-II shall constitute the developed land areas up to or close to the shoreline, within the existing municipal limits or in other existing legally designated urban areas, which are substantially built-up with a ratio of built up plots to that of total plots being more than 50% and have been provided with drainage and approach roads and other infrastructural facilities, such as water supply and sewerage mains etc.</p> <p>We are resident of tal-guhagar, Dist-Ratnagiri, Maharashtra place where local body is nagar panchayat. The area covering to what distance (close to shoreline) is not mentioned in above CRZ II definition. As near to main city the population is higher than 2191 /km as per CRZ III A and also roads and infrastructure.</p> <p>Facilities water supply is already provided by nagar panchayat. The ratio of built up plots also more than 50%.</p>
<p>2.3.1. it would again come under CRZ-III and this area will remain undeveloped though having famous beach with excellent opportunity for tourism development.</p> <p>Include the entire Paduvaray Village in the CRZ-II or in the alternative remove the criteria of having density of population above 2161 per sq. km. as per 2011 census and thereby promote the development of this area.</p>	<p>Mining of atomic minerals should be permissible activity in NDZ under Para 2.3.3.</p> <p>Mining of atomic minerals may be permitted selectively in CRZ-I A under Para 5.1.1 with a clause for compensatory plantation of mangroves.</p> <p>Mining of atomic minerals including beach and sand minerals (Ilmenite, Rutile, Zircon, Monazite, Leucocene, Sillimanite and Garnet) to be specified under various clauses under which the activity is permissible including CRZ-IV A for imparting better clarity.</p> <p>For project attracting both CRZ as well, EIA Notification, Rapid EIA may be prepared based on TOR issued by the EAC or SEAC under EIA Notification.</p> <p>In Para 1.9 (ii) (a) of Annexure-I, mining of atomic minerals may be permitted occurring as such or in association with other minerals.</p> <p>Under Para 3 (H) of Annexure-V in context of mining proposals, the following details should be obtained from the Proponent:</p> <p>Government order for mining lease/exploration/production lease approved mining plan details, extent of mining lease area, capacity of mining, type of minerals to be extracted and end use of the mineral.</p>	<p>Arun Kumar Mahapatra Indian Rare Earths Ltd. Mumbai</p>	<p>90</p>

		<p>Then what area this will fall CRZ II or CRZ III A</p> <p>Also CRZ III B area talks about only population which is contradicting to CRZ II for local nagarpanchayat developed areas.</p>
92	Raj Chandrachud	<p>"10.3 CRZ areas falling within municipal limits of the Greater Mumbai:</p> <p>(i) In order to protect and preserve the, green lung" of the Greater Mumbai area, all open spaces, parks, gardens, playgrounds indicated in development plans within CRZ-II shall be categorized as No Development Zone. A Floor Space Index up to 15% shall be allowed only for construction of civic amenities, stadium and gymnasium meant for recreational or sports related activities and the residential or commercial use of such open spaces shall not be permissible."</p>
93	Saleel Manjrekar	<p>Objection & Suggestions for draft Coastal Zone Management Plan (CZMP) of Thane & Palghar Area. Affected area of Thane City: S.No. 31 to 48, 51, 54, to 61, 87, 88, 89 & 431 (439) of village Kalwe, Thane Municipal Corporation, Thane.</p>
94	Amit Vadnere	<p>Methodology to finalize High Tide line (HTL) As per the definition given in the document as per Point no - 1 (i) HTL means the line to the land upto which the highest water line reaches during the spring tide (As demarcated by National Center for sustainable Coastal Management) (NCSCM) (In accordance with the laid down procedures).</p> <p>Point no 5.2 (ii) Construction is allowed landward of existing road or existing authorized fixed structures (What is the definition of existing road and the authorized fixed structures)</p>
95	<p>Project Director and Superintending Engineer, Kharland Development Circle, 4th floor, Sinchan Bhavan, Kopari, Thane (East)- 400 603 Phone: 022-25329886/87</p>	<p>The main objective of the Kharland Development Schemes is the protection of the agricultural land from saline water as per The Maharashtra Khar Lands Development Act 1979 and thus to create sustainable livelihood for the farmers as there is no other means of livelihood other than agriculture.</p> <p>Exemption from CRZ clearance in respect of Kharland scheme in Maharashtra state. To repair/ reconstruction/ renovation of Kharland schemes if the alignment of the scheme passes through mangrove areas or is likely to damage the mangroves a minimum two times the mangroves area affected /destroyed / cut during the construction process shall be taken up for compensatory plantation of mangroves.</p> <p>Clause no. 5.1.2 CRZ IB- The inter tidal areas</p>

<p>(f) Measures to prevent sand bars, installation of tidal regulators, laying of storm water drains or structures for prevention of salinity ingress such as Kharland development schemes (Constructed as per the Maharashtra Kharlands Development Act 1979) and fresh water recharge.</p> <p>Hence Clause no. 5.1.2 may please be amended accordingly.</p>	<p>Don't reduce the CRZ to the land area between HTL and "50 meters or width of the creek, whichever is less from HTL"</p>	<p>Tapan kumar Mishra Paschimbanga Vidyam Mancha Kolkata, India mishratapan@hotmail.com</p>	<p>In the clause – 7 under "CRZ clearance for permissible / regulated activities – Delegation". The proposal to make CZMA of any particular state the delegated authority for consideration and clearance of all projects which fall purely in CRZ-II / CRZ-III areas is a decision that dilutes the very idea of keeping vigilance on environmental regulations of the land by the project proponents of development activities.</p> <p>The permissible activities in CRZ-1A, (as described under sub-clause 5.1.1) like ecotourism, roads and roads on stilts for public utilities should not be allowed.</p> <p>In the clause – 7 under "CRZ clearance for permissible / regulated activities – Delegation". The proposal to make CZMA of any particular state the delegated authority for consideration and clearance of all projects which fall purely in CRZ-II / CRZ-III areas is a decision that dilutes the very idea of keeping vigilance on environmental regulations of the land by the project proponents of development activities.</p>	<p>Subedar Ramji, Ambedkar Nagar, ARA Sehkari Grahirmaan Sattha Maryadi, Mumbai +19 Representations</p>	<p>96</p>	<p>Tapan kumar Mishra Paschimbanga Vidyam Mancha Kolkata, India mishratapan@hotmail.com</p>	<p>97</p>	<p>Subedar Ramji, Ambedkar Nagar, ARA Sehkari Grahirmaan Sattha Maryadi, Mumbai +19 Representations</p>	<p>98</p>	<p>Adv. V.R. Ramachandran Thrissur, Kerala</p>	<p>99</p>	<p>Worli Siddhivinayak SRA co. society ltd. Mumbai</p>	<p>100</p>	<p>Vaibhav Vijay Naik</p>
<p>Please do the needful to waive the restrictions of CVCA and include Malvan Municipal area in CRZ-II</p>														

	Maharashtra	category as per the definition given in CRZ Notification.
101	Dakshina Kannada, Udupi, Karnataka	2.3.1 CRZ-III A NDZ should be reduced to 50 m from HTL if population is more than 2161 sqm (The density clause should be exempted) In CRZ III B permit the fisher man dwellings in NDZ
102	Mr. Kashinath K. Pagdhare	HTL & road side distance by 50 m that will impact the mangroves. Thus this draft is antifisheries. We insisit to keep 2011 CRZ Notification.
103	Ram Charitra Nishad Member of Parliament, Lok Sabha Machhishahr Consituency, UP	Allow mining of all minerals in territorial waters of India falling in CRZ IV. Para 5.4: "mining of all minerals including atomic mincral
104	PV Hari Krishna Director,	Regulation of permissible activities in the CRZ-IA iv) Farming of aquatic organisms normally occurring in such habitats such as shrimps, mangrove crabs, molluscs, aquatic flora and finfishes may be permitted in this zone, so as to contribute to the biotic conservation and holistic development of the ecologically sensitive areas. Regulation of permissible activities in the CRZ-IB (Intertidal Zones) Aquaculture operation consists of two major phases, such as Hatchery and Grow out. The setting up of hatchery is a permitted activity in this zone (5.12 vii). However, the grow out farm or aquaculture farm is not cited as a recognized activity in this zone. The Inter tidal being a natural habitat of several aquatic species, especially aquatic weeds, such as Oysters, Clams and Mussels, the propagation of such species deserves to be considered. Hence, the following may be incorporated under the permitted activity as clause xiv) The farming of such natively occurring aquatic species may be permitted in CRZ-1B, so that conservation of these species is made possible. Livelihood aqua farming operations by local communities may also be permitted. Regulation of permissible activities in the CRZ-III

<p>Under the clause ii). of the permitted/regulated activities in the No Development Zone (NDZ), the para b) refers to the following permitted activities,</p> <p>Marticulture/ Aquaculture may be considered to be included under the permitted activities in NDZ/CRZIII.</p>		105
<p>No Specific comments</p> <p>Chothavillai beach is one of the tourism places in Tamilnadu. This place is situated in between Nagercoil and Kanyakumari at Puthalam Town Panchayat. In 2001-it was permitted under tourism area by central and State government. After 2011 this place is in CRZ I area and because of that there is no development CRZ I area at Puthalam Town Panchayat is not given permissions to build houses and hotels that hardly affected the tourism peoples and local peoples.</p> <p>Kindly change this places from CRZ I to CRZ II to build buildings and tourism development activities.</p>	Dr. V. Sivakumar BHMS	106
<p>Hotels, shopping malls should be allowed in CRZ II</p> <p>The existing CZMPs already approved shall continue to be valid till the final CZMPs prepared under this Notification have come into effect.</p> <p>The validity may be further extended for a maximum period of three years, or such extended period as may be justified in the facts and circumstances of the case;</p> <p>Mangroves shall not require any buffer zone in CRZ II Areas.</p>	G D Chipiunkar	107
<p>Fixing inter tidal zone (ITZ) by salinity of 5 ppt is not an international practice. Fix the inter tidal zone to a maximum of 8 kms from estuary.</p> <p>Para 10.2 This is the main clause affecting Kerala backwaters islands. No Development Zone mentioned in the draft 20 meters-it should be reduced to 10 meters as suggested by Nayak commission.</p> <p>Again in NDZ all dwelling units should be permitted subject to a maximum plinth area of 100 Sq. m (1075 Sq. ft)</p> <p>Local inhabitants should be exempted from the ambit or CRZ Notification. They should be allowed to build home in their inherited land.</p>	<p>Varapuzha Gramapanchayat office Ernakulam, Kochi +1 representation</p>	108
<p>CADAL representing the fisher folk and local communities in the coast.</p> <p>Notification's main focus appears to regulate activities of the traditional owners of the land while opens up the coast for the construction of roads, hotel, tourism and corporate interventions.</p>	<p>Joseph Jude Arackal CADAL, Coastal Area Development Agency for Liberation is a nonprofit organization aiming at the</p>	

<p>integral and sustainable development of the Coastal people of Kerala.</p>	<p>The proposal that “Development of vacant plots in the designated areas for construction of beach resorts/hotels (CRZ II.v) would give room for massive intervention on the sea coast by the tourism lobby. Those vacant plots may be alternatively compensated to rehabilitate the fishermen who are already facing the crunch of land.</p> <p>The draft CRZ notification 2018 is in line with the Sagarmala project which envisages over 400 projects related to port modernization, new port development, port connectivity enhancement and port linked industrialization over the 2015-2035 period.</p> <p>The draft CRZ notification proposes a series of changes in the 2011 version; One of the main changes proposed in the 2018 notification is that the CRZ limits on land along the tidal influenced water bodies has been reduced from 100 meters to 50 meters or width of the creek, whichever is less.</p> <p>The draft notification bases itself on a flawed demarcation of the HLT by the National Centre for Sustainable Coastal Management.</p> <p>In the 2018 Classification CRZ I A is environmentally most sensitive and CRZ I areas, shall be permitted only in exceptional cases for defense, strategic purposes and public utilities subject to a detailed marine/ terrestrial environment impact assessment, to be recommended by the Coastal Zone Management Authority and approved by the MoEFCC;</p> <p>“.. and in case construction of such roads passes through mangrove areas or is likely to damage the mangroves, a minimum three times the mangrove area affected/destroyed/ cut during the construction process shall be taken up for compensatory plantation of mangroves” it added.</p> <p>As per the draft, CRZ II will include “developed land areas up to or close to the shoreline, within the existing municipal limits or in other existing legally designated urban areas”. But in 5.2.v it explains that “Temporary tourism facilities shall be permissible in the beaches. Such temporary facilities “shacks; toilet blocks, change rooms, drinking water facilities etc” will open up the beaches for real estate lobby. Such temporary tourism facilities are also proposed to be permissible in No Development Zone of the CRZ III areas.</p>
---	--

<p>“Regulated limestone mining is proposed to be permitted, subject to strict environmental safeguards, in areas adequately above the height of HLT, based on recommendations of reputed national institutes in the mining field.” the MOEFCC statement reads.</p> <p>Recommendations</p> <p>Enact a law in the centre to protect the rights of the fishermen and the traditional communities of the sea coast who have the traditional and customary right over the land. The law has to uphold the rights over the land, coastal protection, livelihood and marine ecology.</p> <p>Except the developed Tourism Zones in the coastal areas, the land from the HTL to 500 sq meters have to be reserved for the rehabilitation of the traditional holders of the sea coast who are facing the challenges of the climate change.</p>	<p>109</p> <p>Bikasa Properties Pvt Ltd + 16 Representations Kotharibuildings, 1st Floor, 115, Nungambakkam High Road, Nungambakkam, Chennai - 600034</p>	<p>110</p> <p>Harish N. Chheda Builders association of Navi</p>
<p>There is a lack of clarity on the demarcation of High Tide Lines. In beaches the HTLs means the line on the land up to which the highest water reaches during spring tide, as demarcated by the National Centre for Sustainable Coastal Management (NCSCM) in accordance with the laid down procedures and made available to various coastal States/UTs. There are several properties which are now low lying in backwater areas. The salinity intrusion is prevented by bunds constructed. However due to damage of bunds, saline water intrusion occurs in low lying areas causing mangroves to grow. In such areas can it be said that HTL will be upto the land where the land boundary is available and the submerged land will be the land between HTL and LTL.</p> <p>Recommendations of Shallesh Nayak Committee which deals with significant recommendations that no restriction on mangroves on private owned lands is not considered. As per Clause .3.11.5 (b) of the report for mangroves in private land, incentives shall be provided by the concerned State/UT Forest Departments for promoting mangrove conservation/afforestation in private land, for which there will be no requirement of a buffer zone. The developmental activities in the private mangrove land can be taken up.</p> <p>Include proper provision for measuring the HTL from the outer boundary of the private property and to include the above recommendation of the Shallesh Committee irrespective of the fact whether saline water is entering in to the land or not.</p>	<p>There should not be restrictions on the consumption of FSI allowed in particular year.</p> <p>5.2 (iii) the building permitted as in (ii) above, shall be subject to the local town & county planning</p>	

	Mumbai	regulations as applicable from time to time and norms for the FSI/FAR prevailing as on the date of CRZ clearance by CZMA”
111	Prakriti NGO, Odisha +1 representation	At Clause 4 under the caption Prohibited activities within CRZ it must be inserted after Point (x) that "In the area between 200mts-500mts zone the drawl of ground water shall be permitted only when done manually through ordinary wells for drinking, horticulture, agriculture and fisheries and where no other source of water is available and within 200 mts from HTL drawl of ground water is strictly prohibited". At Clause 5.2 (ii) 1st line after the words "residential purpose" and before the word "schools" these words are to be inserted "commercial purpose". "existing local town and country planning regulation i.e on 19.02.1991 as modified from time to time, and the norms for the Floor Space Index or Floor Area Ratio, which shall be as per 1991 level". At Clause 5.2 (v) 1st line after the words "Annexure - III" these words are to be inserted "subject to the Kisam in the Record of Right (ROR) should not be Bagayat or Bagan (land having trees)".
112	Kerala	Construction has to be permitted in the No Development Zone (NDZ) of CRZ-III for fishermen/traditional communities These are highly essential requirements for the traditional/fishermen, and the right for the same needs to be reinstated in CRZ-II and CRZ-III areas. Kerala being criss-crossed with numerous inland water bodies under the purview of CRZ notification, 2011, the CRZ area landward of HTL up to 100m creates the same hurdle as above for traditional communities. The construction of dwellings needs to be permitted on the banks of paddy fields/pokkali fields/aqua farms for their sustenance.
113	Ajay Bhadoo, IAS Gujarat Maritime Board, Gov of Gujarat	Point no. 8 procedure for CRZ clearance under sub point (1) (c) Comprehensive EIA needs to be replaced by Rapid EIA. The coastal area containing high erosion area should be permitted for port development subject to rigorous studies and model analysis as port settlement itself act as shore protection. Port Limits and Port premises may be designated as CRZ-II area. The mangrove patches in port limits should not be considered in the CRZ IA area. In previous CRZ Notification-2011 for obtaining permission of National Board of Wild Life for any project falling within 10 km radius of Eco-Sensitive area/marine park/wildlife sanctuary, hence the distance of radius may be reduced to proximity of project boundaries i.e 1 KM or so. i.e projects falling in CRZ falls within radius of 1 km should obtain permissions under National Wild Life Board.
114	CPR Namti Environment Justice	Maintain the land area till 100 m from HTL or width of the water body, whichever is less along the tidal influenced water bodies as CRZ (as NDZ).

116	Amrit Anil Malik +12 representations	CZMPs should have been framed earlier to the revision of the 2011 Notification. Draft Notification is more of industrialisation and urbanisation plan and not environment oriented
115	Mandar Talauliker	Draft CRZ notification that will destroy the bio-diversity, environment & traditional dwellers of the coastal areas of Goa. I request you to kindly cancel the draft CRZ, 2018.
Program		<p>As per suggestion of Shailesh Nayak Committee, "Bays" need to be deleted from tidal influenced water bodies.</p> <p>Maintain the CRZ in all mainland and offshore land.</p> <p>Ecotourism activity will pressure on ESA</p> <p>Doesn't make distinction between salt marshes and salt pans based on the biodiversity</p> <p>Sand dunes & sandy beaches (ESA areas): Mining is a prohibited activity except for the removal of rare earth minerals with proper replenishment using the tailings or other suitable sand.</p> <p>Permission for storage of Monoethylene glycol and acetic acid in CRZ increase the risk to unique habitat in events of accidents.</p> <p>Expansion of fish processing units will mean less open inter-tidal spaces and less protection against natural hazards.</p> <p>Waste treatment facilities should not allow in CRZ I and conveyance of treated effluents in CRZ-IB. Allow salt harvesting in CRZ IB without the requirement of use of "Solar Evaporation" it implies that saltpans are now be used by the Bigger Commercial Entities also.</p> <p>CRZ II: An amendment in construction and building rule will increase the pressure on the coasts. Don't mention temporary tourism facilities it will increase the pressure on the coasts.</p> <p>Solid waste in CRZ II should be managed according to SWM (sewage rules) need to be amended in the CRZ notification</p> <p>CRZ III and NDZ: Construction of house for local communities, temporary tourism facilities, Home stay facilities etc. land use changes will take place closer to sea and pressure on already crumbling facilities for management of waste, sewage disposal and will occupy the currently fishing ground, and livelihood of traditional communities and constitute fragile ecosystem. Such as sand dunes, coral reefs and inter tidal areas.</p> <p>Validity of CRZ clearance: this change reduces the liability of the PP to initiate the construction in the Five years and fenced off for certain projects.</p> <p>Clearance procedure: All projects should get clearances through the MoEFcc. The changes could mean the local dwelling can be granted approval without the involvement of CZMA's. In past there are several cases (illegal construction in GOA). This change may increase the such cases.</p>

		<p>planning tool.</p> <p>Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours.</p> <p>Reclamation should be totally prohibited.</p> <p>Any construction of beaches, No Development Zone and CRZ-I should be completely prohibited.</p> <p>No mining should be promoted.</p>
117	Sem Fernandes	<p>We oppose this CRZ Notification, bcoz our existence at this coastal area of palolem is from our ancestral family. Highly request to abolish this policy.</p> <p>So people can live in peace & harmony.</p>
118	National Centre for earth Science and studies (NCESS), Kerala +1 representation	<p>Comments are related to the draft CZMP for Kerala and not specific to the draft CRZ Notification, 2018.</p>
119	Leslie Dsouza	<p>Against the Draft notification</p>
120	Aleixo Azavedo	<p>It's a pity that instead of being protective of life and environment we are trying to destroy it I strongly object to the new CRZ being proposed as it will lead to displacement and destruction of our villagers. Stop this destruction which is happening in the name of Development</p>
121	Ramesh 303 B&F Habitat Khorlim, Mapusa 403507 Goa	<p>This is an official notification of my objection to the DRAFT CRZ NOTIFICATION 2018 especially related to the State of Goa. India This affects 18 Villages and over 90 locales.</p> <p>I hereby write to inform you that I voice my objection to this being implemented and expect full consultation of the public in this interest before implementation of this Draft CRZ Notification 2018.</p>
122	Ashton Abranches	<p>I have written this mail to oppose CRZ draft that will dcestry Goa.</p>
123	Judith T.Coutinho	<p>Objections to the Draft Coastal Regulation Zone Notification 2018,</p> <p>No prior consultation with people living on coasts</p> <p>The words "development in coastal areas" have been illegally added to the preamble, the CRZ notification has been to reduce and eliminate non-essential activities that do not require to be on the water front. Similarly, the words "except as respects things done or omitted to be done before such supersession" have been deleted from the preamble with the obvious intention to regularize all violations of the CRZ Notification since 19th February 1991, and hence this deletion is also illegal.</p> <p>New CRZ law should be an Act of the Parliament and not a delegated legislation.</p> <p>CZMPs should have been prepared and implemented first.</p>

<p>Existing laws call for protection of certain areas like mangroves, salt marshes, intertidal areas etc, the MoEF&CC has not opened up these very areas for destruction.</p> <p>The CRZ areas of tidal influenced water bodies have been reduced to 50m from the 100m that the 2011 notification prescribes. The CRZ notification 1991 that preceded the 2011 notification mandated a 500m buffer. These changes are against the basic principles of law-making.</p> <p>REDUCES CRZ AREA FOR ISLANDS: CRZ Notification 2011 provides for CRZ up to 500 metres from the HTL for offshore islands on landward side of the sea and up to 50 metres for islands in backwaters of Kerala.</p> <p>The draft CRZ Notification 2018 reduces the CRZ to 20 m from HTL for islands in coastal backwaters, as well as on landward side of islands along the mainland coast.</p> <p>The 2018 draft CRZ notification provides a lot of scope for permitting projects that fall within the "Defence", "Strategic", "Security" and "Public Utilities" categories. However, no definition for any of these words have been provided.</p> <p>The 2018 draft notification opens up for construction and non-traditional activities the ecologically sensitive "Intertidal Areas"</p> <p>Decentralizing the entire clearance procedures will only lead to a complete collapse in the administration and implementation of the CRZ notification.</p> <p>Permitting the receipt and storage of the said chemicals in CRZ IB. This will cause a huge risk to the sensitive ecology, habitat and biodiversity of the coastal areas.</p> <p>Restrictions on withdrawal of groundwater within 200-500 m from HTL have also been relaxed in the 2018 notification, making it a permissible activity through manual wells for agriculture, horticulture, fisheries, drinking purposes, etc.</p> <p>CRZ 2011 Prohibits the "Dressing or altering sand dunes, hills and other natural features including landscape changes for beautification and recreational purposes" This has been edited to only include "Active" sand dunes. However, no definition has been provided for what are considered "Active" Sand dunes. This change also means that the protection offered to hills and other natural features of the coast have now been removed, giving legality to constructions on these ecologically fragile areas. Considering that the entire stretches of the western coastline are not sandy, but hilly, the removal of protection indicates intent to open up these areas for real estate and other constructions. Further, even sand dunes can be destroyed now by classifying them as not being active.</p> <p>High Tide Line: The High Tide Line demarcated by the National Centre of Sustainable Coastal</p>	<p>Ashok Pandurang</p>	<p>124</p>
---	------------------------	------------

	<p>Kutewala Ashokkutewala Kutewala (Traditional Fisherman) Organisation: Khar Danda, Koliwada, Khar West Mumbai 400 52</p>	<p>Management (NCSCM) has been completed without any local participation and therefore is unreliable.</p> <p>Zoning: By using a combination of new baselines, a reduction in No Development Zone limits, changing of zone definitions, addition of new zones and the elimination of the Hazard Line, the draft CRZ 2018 notification effectively allows for more “development” to be permitted in the coastal stretches.</p> <p>Setback lines: The Draft CRZ 2018 Notification has weakened the powers and protection that set-back lines like Hazard Line offers to coastal areas under the existing CRZ Notification, 2011.</p> <p>Prohibitions: The draft 2018 notification brings in a number of relaxations to the clause defining prohibited activities under the CRZ 2011.</p> <p>Restrictions: The draft CRZ 2018 notification relaxes a number of restrictions on the setting up of coastal industries that were regulated by the earlier notifications.</p> <p>The draft overall is more favorable for constructing industries, ports, transport and tourism, as opposed to protecting the environment and safeguarding traditional livelihoods and therefore must be immediately dropped.</p> <p>Coastal Rights Bill: The MoEFCC restart the process of consultations for the drafting of a comprehensive Coastal Rights Bill (recognition of rights of fishing communities) that will help settle the historic injustice meted out to the fishing communities and settle land rights of the community. This must be done via a consultative process with the fishworkers and be undertaken keeping the principles and spirit of the CRZ 1991 notification in mind.</p> <p>CZMPs: The Coastal Zone Management Plans (CZMPs) under the CRZ, 2011 be completed including the demarcation of lines, zones, plans and the long-term housing needs of coastal fisher communities – in a transparent and accountable way, with community participation and wisdom being incorporated.</p> <p>Past Violations: The CRZ 2011 notification be implemented before GoI comes out with another CRZ notification. This is to ensure that the new draft does not legitimize and regularize past violations.</p>
125	Atreya Sawant	<p>Point 1. (v) (to be inserted) <u>Boats, ships, floating vessels, pontoons which are registered with local registering authority as well as water sports crafts, other floating structures</u> is out of the CRZ preview. <u>These vessels can operate, anchor, park in all CRZ areas except which are restricted.</u> (this point addition is required due to the introduction of <u>CRZ 4 A and CRZ4 B. Otherwise shipping will be non-permissible activity</u>)</p>

Point 1(vi) – Goa has a huge number of manmade ponds between farm lands and rivers which has sluice gates which are made for extra fresh water to move out from the field to the river. The ponds beyond sluice gates towards land side should be out of the CRZ preview.
(these ponds were man made for controlling the water for the farm, hence these areas should be out)

Point 2.1.1 (a) (i) committee to review consideration of 1000 sq meter of Mangroves. It needs to be increased. (1000 sq meter is very small area and lot of areas will come under buffer zone hampering economic activity of the locals)

Point 4 (viii) – Sand is only available in CRZ IV B area in Goa, hence, it should not be a prohibited activity as there is no other source.
(lot of local are involved in sand mining in goa on manual basies. They will lose employment if sand mining is ban. Also in Goa, we won't be able to get any alternative sand)

Point 5.1.1. CRZ – I A (ii) – after the word “roads on stilts” please add words like “bunds, sluices gates, ramps, fishing jetties, etc”;
(there are also some of the activities carried here)

Point 5.1.2. (i)(a) word Drydock to be inserted after the word slipway
(Dry-dock word need to be inserted as this is also a separate activity requiring Bunding)

Point 5.1.2 (ii) word shipyard and its associated facilities to be added after the word jetties
(shipyards require water front and all the structure which are required to be build fall in CRZ area. Lot of the time authority take time to understand the requirement of shipyard and don't give permission which hamper operations.)

Point 5.1.2(XIX) to be added – temporary events like beach wedding, beach sports events should be permitted.
(goa being a tourist place lot of activity happen on the beach which is of temporary nature. The same need to be permitted)

Point 5.1.2(XX) anchoring, parking of vessels, ships boat should be allowed. (lot of time boats are pulled

	<p>and kept in this area)</p> <p>Point 5.1.2(XXI) – fitting of high mass light, security cabins and other structures required for safety of public to be permitted along with infrastructure for handicapped and temporary disabled people be allowed. (public benefit activity should be allowed to take place)</p> <p>Point 5.2 (vii) – repair, reconstruction and maintenance of existing floor area should be allowed with permission of CZMP (lot of structure are in existence for many years. Hence they should not be made EAI and other reports for repairs of the structures.)</p> <p>Point 5.3 (ii)(h) - add words like “bunds, sluice gates, ramps, fishing jetties”. (these activities are also carried out)</p> <p>Point 5.3. (ii)(f) – please add “existing roads prior to 1991” after the word “state highways”.</p> <p>Point 5.3 (iii) – Please add the words “except areas around the creek” after the word “areas beyond the NDZ”. (In creeks NDZ is only 50 meters, hence I should be clear here that the section is not applicable for areas in creek)</p> <p>Point 5.3 (iii)(c) - Replace the word “Homestay” with “commercial small scale activity, like restaurant, grocery shop, bar, handicrafts shop etc”. (these activity is also taken up by the local generate revenue)</p> <p>Point 5.4 (i) – sand mining done by manual labour should be permitted.</p> <p>Point 5.4 (iii) word shipyard and its associated facilities to be added after word Jetties.</p> <p>Point 5.4 (15) – dragging of rivers, dumping of silt to be permitted.</p>
--	---

<p>(this work is carried out in CRZ4 area)</p> <p>Point 7(vii) – Facilities which require for shore areas like jetties, ramps, slip ways, bunds, sluice gates, shipyards should take CRZ clearance from concerned CZMA. Repair, restoration of existing structures clearance to be taken from CZMA.</p> <p>(lot of structure are already in existence for more than a couple of decades. They don't have EIA reports as it was not mandatory. Hence for repairs and restoration of this facilities should be given by local CZMA)</p> <p>Point 8(i) – after the word “CRZ notification” please add “for new projects only”;</p> <p>(it will be too cumbersome procedure for people taking repair and restoration of existing structure. Repair and restoration should be kept out of the procedure stated in point 8.)</p> <p>Point 8(ix) – going to MoEF and SEIAA, should not be applicable to existing projects, repairs, reconstruction and maintenance. It should not be applicable also for people building individual houses upto 500 sq m within the framework of CRZ.</p>	<p>The draft CRZ notification of 2018 is a focused, schemed dilution of the existing CRZ Notification 2011,</p> <p>The provisions of the CRZ Notification 2011 have not yet been completely implemented in all states due to the delay in the preparation of the Coastal Zone Management Plan. Even before the CZMPs can be approved and implemented, the MoEF&CC has begun diluting the protection that the plans offered.</p> <p>When existing laws call for protection of certain areas like mangroves, salt marshes, intertidal areas etc., the MoEF&CC has opened up these very areas for development and tourism through the Draft CRZ 2018 notification.</p> <p>The draft notification is a development, industrialization and urbanisation plan and not an environmental-oriented planning tool.</p> <p>Weakened Setback Lines – The Draft CRZ 2018 notification is an invitation to disaster as it opens up hazardous areas between the High Tide Line and Hazard Line to development. The Draft CRZ 2018 Notification has weakened the powers and protection that set-back lines like Hazard Line offers to</p>	<p>126</p>
	<p>Sayee Giridhari, Mumbai, Maharashtra. 9/06/2018 +1 representation</p>	

	<p>coastal areas under the existing CRZ Notification, 2011.</p> <p>The CRZ areas of tidal influenced water bodies have been reduced to 50m from the 100m that the 2011 notification prescribes. The CRZ notification 1991 that preceded the 2011 notification mandated a 500m buffer.</p> <p>The rationale behind demarcating CRZ III A and III B areas based on population density has also not been explained.</p> <p>Permitting Prohibited Activities – The CRZ Notification was originally brought in to protect the coastal ecology and the unique features of the coast, protect coastal livelihoods and to prohibit detrimental activities to the same. However, the draft 2018 notification brings in a number of changes to the clause defining prohibited activities under the CRZ 2011.</p> <p>CRZ 2011 prohibits the “Reclamation for commercial activities such as shopping and housing complexes, hotels and entertainment activities”. This has now been deleted, making reclamation of CRZ areas for commercial activities a permissible activity.</p> <p>CRZ 2011 Prohibits the “Dressing or altering sand dunes, hills and other natural features including landscape changes for beautification and recreational purposes” This has been edited to only include “Active” sand dunes. However, no definition has been provided for what are considered “Active” Sand dunes. This change also means that the protection offered to hills and other natural features of the coast have now been removed, making them permissible activities.</p> <p>Special Consideration to undefined “Defence and Strategic” “Public Utility” and “Security” Projects - The 2018 draft CRZ notification provides a lot of scope for permitting projects that fall within the “Defence” “Strategic”, “Security” and “Public Utilities” categories – However, no definition for any of these words have been provided. The MoEF&CC utilizes this ambiguity to allow a range of exceptions for these projects.</p> <p>Favoring Coastal Tourism over Coastal Livelihoods – The draft CRZ 2018 notification plays into the coastal tourism agenda of the government by permitting the development of year-round tourism facilities</p>
--	---

in all coastal states. The intent of the government to shift coastal areas from being livelihood spaces of the fishers and safety buffers for the inland to recreational space for the rich is evident and ill-advised.

Favoring Coastal Industrial Development over Coastal Ecology and Bio-Diversity – The draft CRZ 2018 notification relaxes a number of restrictions on the setting up of coastal industries such as Thermal Power Plants, Desalination Plants, Waste Treatment Plants, Non-Conventional Energy Generation etc. that were regulated by the CRZ notification 2011.

The 2018 notification allows for reclamation of water and bed areas in CRZ IV for construction of industries, ports, memorials, monuments etc. The protection measures that were mandated by the CRZ 2011 including restrictions on development, and mapping of livelihood spaces, fishing grounds, land use and community infrastructure etc have been done away with.

Instead of strengthening the law and securing the life and livelihood spaces of the fisherfolk, the MoEF&CC is partaking in large scale Ocean Grabbing, promoting the blue economy by bringing in legislative changes, such as the draft 2018 notification that redefine the primary user of the seas.

Decentralizing Clearance Procedures – The 2018 draft notification has overturned the entire clearance procedure by granting powers to the state CZMAs and other local authorities, which were till now only a clearance appraising authority at the district and state levels to grant CRZ Clearances.

Decentralizing the entire clearance procedures will only lead to a complete collapse in the administration and implementation of the CRZ notification.

Removing special considerations to the CRZ Areas like Goa and Kerala, including provisions that restricted setting up structures on the beach; the coastal areas of Kerala and Goa have been opened up for development. These considerations were put in place keeping in mind the unique coastal ecosystems in these areas. By removing these special considerations, the responsibility of the government to prepare special protection plans has been lifted.

I on behalf of fishers in India register our total and complete opposition and rejection to this "Draft Coastal Regulation Zone Notification 2018" put out for public comments by the MoEF&CC government

		of India. The Ministry is urged to revisit its founding principles and take steps to adhere to their mandate in protecting the environment and the people dependent on the environment instead of paving way for short sighted economic gains by promoting destructive development and tourism on the coast of India.
127	Husseni Ghasia	CRZ should mainly deal with seashore and undeveloped lands and only these should be classified as No Development Zone. Older buildings built before 1991 should be permitted to be re-developed without any CRZ considerations in Mumbai.
128	Centre for Responsible Tourism Institute Piedade, D.B. Marg, Panjim Goa - 403 001	The way the draft is framed seems more like guidelines to facilitate projects rather than to protect the environment. In view of the above, the draft CRZ notification 2018 should be categorically withdrawn. Prepare and enact, through democratic consultation with all stakeholders, especially fish workers, a Comprehensive Legislation (Act) that will ensure conservation of coastal environment, ecology and natural resources and protect traditional livelihood options.
129	Adv Sonia Raj Sood.	Draft CRZ notification is only about protecting the interests of the developers by releasing higher FSI in CRZ areas. CRZ buffer limit along creeks should be at least 100 Mts as per CRZ notification 2011.
130	Padmalochana enterprises pvt Ltd Nungambakkam, Chennai +5 representations	Include proper provision for measuring the HTL from the outer boundary of the private property and to include the above recommendation of the Shailesh Committee irrespective of the fact whether saline water is entering in to the land or not.
131	Jagat Shah & Minaxi Shah Jagat, M: 99877-66788, 93201-66788, Res: (022) 2671-2228 Email: jagatshah567@gmail.com	Pl. note that our Property bearing CTS No.2042, Survey No.147, Hissa No.1 of Village: Erangal, Madh Island, behind residential complexes of M/s. Raheja Universal Ltd., Tokra, Helen Nagar, Behind Larsen & Toubro Ltd., Malad (west), Mumbai-400 061 in Mumbai Suburban District in P/N ward of Bombay admeasuring 39,456 sq.mtr. approx. is very far away i.e. 1,031 mtr. away from HTL of main Arabian Sea Line on our West side & more than 100 mtr. from HTL of sea creek on our East, North and South Sides respectively. Hence, our Property should not be marked under Coastal Regulation Zone, Natural Area or No Development Zone by the Authorities or under any restrictions for constructions or developments under Residential Zone.
132	Akshaya Padnekadapuram	Valiyaparamba in Kasaragod Distict is one of the most backwater stretches in Kerala. The total width of

President, Vallyaparamba Gramapanchayath	50 meters. Majority of the people of this village are traditionally farmers and fisherman. The decision to include this area in CRZ III B is very unfortunate.	
133	EP (MP) section Farming of aquatic organisms normally occurring in such habitats such as shrimps, mangrove crabs, molluscs, aquatic flora and finfishes may be permitted in in the CRZ -1A areas. Livelihood aqua farming operations by local communities may also be permitted in CRZ -1B. Mariculture/ Aquaculture may be considered to be included under the permitted activities in NDZ/CRZ III. The Clause (i) permits traditional fishing and allied activities undertaken by local communities. However, Aquaculture or Mariculture or Open Sea Farming is not specifically cited as a permitted activity in CRZ IV, which is perhaps an inadvertent omission. Globally, capture fisheries production is stagnating and aquaculture is considered as the only alternative to increase production from the point of nutritional/food security. Hence, such activities may be cited under Clause (i), or under any other suitable heads, since open sea farming is an activity with great potential in the open waters, quite like agriculture in the land. (Several Fish producing nations are rationally utilizing these vast resources, and therefore, the country stands to gain from such natural resources).	
134	Sachin Kadam XXX 9823435075 +1 representation	All CRZ-III areas should have uniform NDZ of 50 meter. Coastal areas are prime real estate. These can be used to develop tourism and leveraging message skilled and unskilled force in these areas.
135	Leslie Alemao	This proposed CRZ draft will change the whole scenario of my beautiful village. It is most disturbing that while environmental problems are irrefutably increasing due to human activities to the scale of threatening the survival of life itself, changes to the CRZ laws are being proposed that will dilute the protection given to the environment and the coastal people, only to increase the industrialization and concretization of the coast. The draft CRZ Notification 2018 must be scrapped and that the new CRZ laws must completely ban all hotels, industries, real estate and concretization in the CRZ, that the restriction of non-traditional activities must be increased and that the coast must be protected.
136	Gabriel fernandes	I raise my objection for Draft CRZ Notification 2018 as it is a anti-people & it is unnecessary for the population of the locals
137	Dr Ir P. V. Chandramohan President (Technical)	CRZ classification can possibly be done in a better manner through pictorial representations, maps or sketches.

	Navayuga Engineering Company Ltd Hyderabad - 500 033 M: +91 98490 11789	The regulation will lead to precious coastal lands devoid of much needed development. CRZ area gets magnified with branching canals in backwaters. NDZ by definition is against development. The Notification looks like Notification of prohibition. Country needs more Ports and Sagarmala initiatives.
138	Edwin Mascarenhas +1 representatio	Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.
139	Paduvary Grama Panchayat Development officer Karnataka	It's good that NDZ will be restricted to 50 m but the condition that the population of that area shall be above 2161 per sq. km. as per 2011 census. This is a big hurdle for development of this beach. Therefore, the density of population critaria should be removed.
140	Vinay Vithu Borkar H.NO: 273, Holibhat Talaulim, Ponda Goa, Pincode: 403401 +26 representations	This proposed CRZ draft will change the whole scenario of my beautiful village. It is most disturbing that while environmental problems are irrefutably increasing due to human activities to the scale of threatening the survival of life itself, changes to the CRZ laws are being proposed that will dilute the protection given to the environment and the coastal people, only to increase the industrialization and concretization of the coast. The draft CRZ Notification 2018 must be scrapped and that the new CRZ laws must completely ban all hotels, industries, real estate and concretization in the CRZ, that the restriction of non-traditional activities must be increased and that the coast must be protected.
141	Suraj J. Dialani + 2 representation President Shipyards Association of Goa (Mobile no. 9158008660) Post Box no. 1192.	Point 1. (v) (to be inserted) Boats, ships, floating vessels, pontoons which are registered with local registering authority as well as water sports crafts, other floating structures is out of the CRZ preview. These vessels can operate, anchor, park in all CRZ areas except which are restricted. (This point addition is required due to the introduction of CRZ IV A and CRZ IVB. Otherwise shipping, fishing will be non-permissible activity) • Point 201.1(a) (i) committee to review consideration of 1000 sq meter of Mangroves. It need to be increased. (1000 sq meter is very small area and lot of areas will come under buffer zone hampering

**C/o. Vijai Marine Shipyard
S9, Sapanra Terraces,
Swatantra Path,
Vasco Da Gama, Goa 403
802.**

economic activity of the locals)

- Point 5.1.2. (i) (a) word Drydock, shiplift, marina to be inserted after the word shipway (Drydock and other words need to be inserted as these are separate activity requiring Bundling)
- Point 5.1.2(ii) word shipyard and its associated facilities, drydocks, shipways, shiplifts to be added after the word jetties (shipyards require water front and all the structure which are required to be build fall in CRZ area. Lot of the time authority take time to understand the requirement of shipyard and don't give permission which hamper operations.)
- Point 5.1.2(XX) anchoring, parking of vessels, ships boat should be allowed. (lot of time boats are pulled and kept in this area as well as lot of water front area in front of shipyard fall in this area.).
- Point 5.1.2(XXI) - fitting of high mass light, security cabins and other structures required for safety of public to be permitted along with infrastructure for handicapped and temporary disabled people be allowed.
- Point 5.2 (vii) - repair, reconstruction and maintenance of existing floor area should be allowed with permission of CZMA (lot of structure are in existence for many years. Hence they should not be made EAI and other reports mandatory for submission for repairs of the structures.)
- Point 5.3 (ii)(h) - add words like "bunds, sluice gates, ramps, fishing jetties". (these activities are also carried out)
- Point 5.3 (iii) - Please add the words "except areas around the creek" after the word "areas beyond the NDZ". (In creeks NDZ is only 50 meters, hence one should be clear here that the section is not applicable for areas in creek)
- Point 5.4 (15) - dredging of rivers, dumping of silt to be permitted. (this work is carried out in CRZ IV area)
- Point 7(vii) - Facilities which require for shore areas like jetties, ramps, ship ways, bunds, sluice gates, shipyards should take CRZ clearance from concerned CZMA. Repair, restoration of existing structures clearnce to be taken from CZMA. (lot of structure are already in existence for more than a couple of decades. They don't have EIA reports as it was not mandatory. Hence for repairs and restoration of this facilities should be given by local CZMA)
- Point8(i) - after the word ICRRZ notification" please add "for new projects only". (it will be too cumbersome procedure for people taking repair and restoration of existing structure. Repair and restoration should be kept out of the procedure stated in point 8.)
- Point 8(ix) - MoEF and SEIAA, should not be applicable to existing projects, repairs, reconstruction and maintenance. It should not be applicable also for people building individual houses upto 500 sq m

		within the framework of CRZ.
142	Newton Vaz	I object DRAFT CRZ NOTIFICATION 2018
143	Silvy Fernandes Calangute Gauravaddo west Bardez Goa	The draft CRZ Notification 2018 must be scrapped and that the new CRZ laws must completely ban all hotels, industries, real estate and concretization in the CRZ that the restriction of non-traditional activities must be increased and the coast must be protected totally. All past violators such as hotels and industries must be punished severely and the poor coastal dwellers whose homes were demolished by misuse of CRZ laws must be given their rights back.
144	Errol Pires AAP Goa + 112 representations	It is essential that this draft CRZ Notification 2018 be scrapped and a new CRZ law be proposed, which will: Increase protection to the traditional fishing communities, including mapping and protecting all the lands and resources that we use for housing, fishing, keeping our boats, nets, etc, mending our nets, fish drying, etc; Increase protection to all the Coastal Regulatory Zones and drastically reduce the uses permitted in each zone; Remove all provisions allowing new hotels, resorts, real estate, industries, ports, power plants, Sewage Treatment Plants and other non-traditional uses in the CRZ completely; Severely punish all the individuals, companies and officials involved in setting up or giving permissions to hotels, resorts, real estate, industries, etc in the CRZ against the CRZ Notification 2011 or involved in the demolition of fisher folk homes; Provide for restoring sand dunes, agricultural lands, low-lying lands and water bodies in the CRZ, including demolition of hotels, industries and resorts, where necessary; Study of the rising sea levels, loss of fish stocks and other global threats from the perspective of local impacts and mitigation measures.
145	Gul Mohamed. 9447176465.	Referring the above I want to note down the following for your kind consideration. 1. I am from Padne village at Kasaragod district in Kerala. 2. Other than the main land there are 3 small islands in the village named as Thekkekad, vadakekad and Ori. All these islands are having a minimum length of 1.5Km to a maximum of 6 km and its width varies from 40meter to a maximum of 150 meter. The population is comparatively dense. Majority of them are fisher men, working class. Their houses are small but a majority of them are 3 meter to 10 meter away from the back water. All the houses were built from their ancestors but renewed and the

		<p>Panchayat allotted only the unauthorised door numbers being in CRZ.</p> <p>3. Most of the people who're in BPL (below poverty line) possess only 2 to 5 cents at the edge of the back water. The present act does not allow them to have their dwellings.</p> <p>4. 99% of the islanders not aware of this notification and even known to them they are indifferent and helpless. I don't know how far the local body and politicians interfering in this matter.</p> <p>5. I sincerely request you not to implement any hard restriction on these 3 islands of Padne village or at least regularise the existing houses disregarding the CRZ act.</p>	146	Gabrielcunha	<p>I object CRZ in goa, because goa was known land for cultivation, where people have built houses and shops with minister permission. I object for CRZ for better coming future of goa and save remaining land for our children future.</p>
		<p>Relaxation to existing fish processing plants and expansion of ongoing fish processing plants needs to allow in the existing fishing notified area.</p>	147	Roy Abraham (Vice president) Small scale industries association Rahul Pandit (President) Ratnagiri Municipal Council	
		<p>Sand dunes which is not part of ESA and only is geomorphological feature so for protecting the dunes in first 100 mt from HTL will sufficient to protect the coast.</p>	148	J. Mohandas	
		<p>In new CRZ notification the following should focused: Any law-making exercise related to the coastlines must be undertaken with the full participation of fish workers.</p> <p>Enact a National legislation for conservation of coastal and marine biodiversity that <i>inter alia</i> protects traditional fishworkers' Preferential Access and Historic Use to coastal and marine resources.</p> <p>Recognise and ensure that other users respect the inalienable Traditional and Customary Rights of fish workers over coastal lands and waters.</p>	149	Citu vadachennai +2 representations	
		<p>Opposition and rejection to this draft CRZ, 2018</p>	150	Kiran Koli Maharashtra Machhimar Kruti Samitee Mumbai	
		<p>There are very few areas in NDZ-III with high density population. Standard NDZ of 50 meter should apply.</p>	151	Mrs. Nazneen Javeri Akshi, Alibaug +13	

	representations	<p>There is tremendous scope of development of tourism industry, which shall ensure huge employment opportunity for rural communities. This will reduce mass migration to urban cities and ease the pressure on the infrastructure of already saturated cities</p> <p>Consider either reducing the required population number per sq. km., or demarcating the NDZ as the area up to 50 mts from HTL in CRZ III areas.</p>
152	Harendra G. Pandya Junagadh +91 98257 29333	<p>Development of land close to the sea shoreline on exciting road on land ward side whiting 1 km. from existing municipal limit shall be permitted to develop as per local building by laws.</p> <p>Diu land within 1 km. from exiting municipal limit or old wall city limit should be in CRZII zone.</p> <p>Commercial building should be allowed up to 16-5 mtr height and still parking or hollow space for parking should be deduct in total height of building.</p> <p>Special permission should be granted for tourism activities and hotel on exciting road of seashore line.</p>
153	Hazira Machimar Samiti	<p>This notification is brought without any consultation with the coastal community and fisherman. In this scenario the ministry has reduced the NDZ and buffer zone is against the basic and fundamental principles of environmental protection of the coastal areas.</p> <p>The Facts of sea level rise and increase of coastal hazard can not be denied. So the reduction in the buffer and NDZ should not be there as proposed.</p> <p>The buffer zone and NDZ should be increased.</p> <p>There is no specific information given for the CVCA in the draft notification. What will be done to protect the CVCA?? The details of CVCA must be incorporated in CRZ Act with clear cut plan to protect the Gulf of Cambay.</p> <p>There are no provisions of protection for the fishing areas and fish breeding grounds. Clear cut provision of marking of the fish breeding ground/spawning ground should be there in the CZMPs.</p> <p>The past violations of the notification taken place should be dealt with proper mechanism in time bound manner.</p> <p>The rocky coast in CRZ IV B areas should be considered as eco sensitive zone.</p>
154	Fimi 48 (B K Bhatia)	<p>2.1.1 CRZ IA (iii) Sand Dunes excluding placer deposit of atomic minerals notified under Part-B of the First schedule of MMDR Act, 1957.</p> <p>Justification: Placer deposit of atomic minerals notified under Part-B of the First schedule of</p>

<p>MMDR Act, 1957 to be allowed for mining.</p> <p>2.3.2 CRZ III as per the study of National Institute of Oceanography (NIO) in 1999-2000 in case of Gujarat Coast near Jatrabad etc, the Limit may be reduced to 60 metres as NDZ for special cases.</p> <p>Prohibited activities within CRZ</p> <p>4 (i) setting up new or Existing industries: Modification in the existing industrial facilities with respect to modern technology without changing plinth area may be permitted.</p> <p>4 (iv) Land reclamation & protective works may be natural course of seawater. Permitted subject to specific conditions.</p> <p>4 (iv) damping of city or town waste: may be allowed with limitation of height, treatment & construction debris, industrial solid wastes, Fly Stabilising guidelines.</p> <p>4 (viii) Mining of sand, rocks and other sub-strata materials except atomic minerals notified under Part-8 of the First schedule of MMDR Act, 1957 occurring as such or in association with one or other minerals.</p> <p>Justification: Atomic minerals are notified under Part-8 of the First schedule of MMDR Act, 1957 to be allowed for mining. Also, as per existing CRZ Notification, 2011, mining of Atomic Minerals is exempted activity. Hence mining of Atomic Minerals is to be continued as exempted activity.</p> <p>Regulation of permissible activity</p> <p>5.1.2 (ix) treatment facilities for waste and effluents: scope required regarding waste heat recovery system in cement plants which is ultimately contribute in reduction of carbon foot print & reduction of pollution.</p> <p>5.1.2 (xii) Manual mining of atomic minerals</p> <p>1. The mining plans pertaining to grade of Atomic Minerals contained in the ore is less than the threshold value shall be approved by Ministry of Mines, as per AMCR, 2016 and not by DAE.</p> <p>2. Timely not recovering the atomic minerals will be the loss forever. Hence mining of atomic minerals with aid of HEMM & Dredger to be allowed in CRZ II & CRZ - III areas, without deploying drilling and blasting, which will lead to recovery and conservation of deposited atomic minerals.</p> <p>5.3 (iii) (e) Limestone Mining</p> <p>Selective mining word to be clarified.</p> <p>Specific identified areas are not clear</p> <p>The Mining may be permitted below HTL as it will not have any adverse impact of salinity ingress as sufficient width will remain untouched from HTL.</p> <p>Mining may be permitted up to within 200 m but not within 60 m of HTL towards sea based on the recommendations of reputed national institute of mining.</p>		
---	--	--

		<p>5.4 CRZ IV (x) Exploration and extraction of oil and natural gas Mining of minerals notified under Schedule - I of Offshore Areas Mineral Development Regulation Act, 2002 occurring as such or in association with one or other minerals in the CRZ - IV. Justification: This CRZ - IV A (water area upto 12 nautical miles) area falls under Offshore Area and applicable under Offshore Areas Mineral Development Regulation Act, 2002. Minerals are notified under Schedule - I this act. Those minerals are Atomic Minerals and they are strategic & rare minerals. Hence, those minerals notified under Schedule - I of Offshore Areas Mineral Development Regulation Act, 2002 to be allowed for mining. CZMP 6 (vi) The CZMPs shall not normally be revised before a period of ten years after which, the concerned State Government or the Union territory may consider under taking a revision.</p> <p>Procedure for CRZ clearance for permissible/ regulated activities 8 (iii) MoEFCC, SEIAA or the concerned State/ Union territory planning authority shall consider such projects for clearance based on the recommendations of the concerned CZMA, within a period of sixty days. If clearance or rejection of the clearance is not conveyed to the project proponent within the period specified in the clause (iii) the clearance shall be deemed to have been provisionally approved and such clearance shall be subject to final decision whenever communicated. Justification: Generally, Environmental Clearance is time consuming process. Hence issuance of provisional clearance will solve the issue.</p> <p>8 (iv) The clearance accorded to the projects under this notification shall be valid for a period of ten years from the date commencement of the project. Annexure 1 1.5 (ii) turtle nesting ground & 5.1.2 (xii) manual mining Justification: Large number of atomic mineral deposits is falling within, turtle nesting ground; Manual mining is the suitable option for exploitation of those placer deposits (atomic minerals). Manual mining is very simple process and similar to sand mining. Also, they are eco-friendly. Hence manual mining of atomic minerals in turtle nesting grounds to be allowed.</p> <p>It is more appropriate to use the word "Atomic Minerals" instead of Rare Earth Minerals.</p>
155	Manohar S Shetty.	2.2 CRZ II- shall constitute the developed land areas up to or close to the shoreline, within the existing

323

<p>Association of Coastal Tourism Karnataka I representation</p> <p>municipal limits or in other existing legally designated urban areas, which are substantially built-up with a ratio of built up plots to that of total plots being more than 50% and have been provided with drainage and approach roads and other infrastructural facilities, such as water supply and sewerage mains etc. It should also be extended to town Panchayat or Grama Panchayat limits having due regard to development having taking place vigourously at such places being a potential tourism spot which will help in reducing the development gap between the municipal limits and Town panchayat and grama panchayat limits and facilitate in employment of local people and help in their financial empowerment.</p>	<p>Centre for Responsible Tourism Panjim, Goa</p> <p>Sand dunes beach stretches along the bay and creeks are also not mapped and on the contrary construction activity is observed on sand dunes areas. The traditional extraction of salt from salt pans is under threat. Mangroves are the first line of defence of rising estuarine waters and should remain as a vital buffer zone. CZMP should be open for public scrutiny for at least 90 days before finalisation. NDZ should remain an area without any human interference.</p>	<p>156</p> <p>Denz Pete</p> <p>No specific comment</p> <p>Myself Denison peter from the cochin kerala. I had bought a new land near to the creek without knowing about coastal regulation zone rule. I am living in an island named vypin, this island is the most populated island in asia. It is a 5 cent land (242 yds). I am going through very difficult situation to build a house. I am from a middle class family and we need a decent house to live. I have seen huge buildings and hotels near my place at Cochin (bolgatty). As a citizen why there are different rules in our country, I don't know! There are so many people like me suffering from the same situation. Please help us by decreasing the rule stage lower level. I hope some one will help us to survive from this situation.</p>	<p>157</p> <p>Sanjay Dalal</p> <p>1) Para 2.3.1 CRZ-III A: The Census criteria of the population less than 2161 per Sq. KM. seems to be unsubstantiated, hence this population criterion should be reduced to 1500 per Sq. KM. 2) Para 2.3.2 CRZ-III B: Similarly, population criteria should be reduced to 1500 per Sq. KM. 3) Mangroves: a) This is a hot topic of environmentalists, wherein they struggle to keep mangroves intact but this mangrove is creating a huge nuisance for people at large. b) To help polluting industries, they come out and manage to stage shows in favour of mangroves to save</p>
<p>158</p>	<p>Sanjay Dalal</p>	<p>158</p>	<p>158</p>

		<p>their polluting masters by placing common man at a great disadvantage.</p> <p>c) It is observed that mangroves grow where there is a lot of pollution in water and air. To reduce the effect of pollution, nature has found a way in mangroves. This is purely due to the reason of pollution, if MoEF&CC take care of pollution with effective implementation of environmental norms strictly, without coming under pressure of lobbyist, activists and corrupt officers, this menace can be easily tackled.</p>
159	Ashwin Parekh	<p>Suggestion to scrap CRZ restrictions altogether for lands on creek.</p> <p>In order to avoid such a situation, we suggest that MoE should order immediate publication of final CZMP (Notification 2011) and ask respective state Governments to instruct/ direct their District Collectors and Town Planning Departments to <u>free 50 metres land</u> (lifting CRZ restrictions) <u>from CRZ line</u> as shown in draft/ final CZMP which is still not out. However, no such action will be required if you fully remove CRZ restrictions on lands on creek.</p> <p>This is the simple and fastest way to implement your latest CRZ notification.</p>
160	Clifford DeSilva Goa institute of Counselling	Please note our objection to the CRZ 2018
161	Bharat reddy Vaka	<p><u>Need further clarity on "Sand Dunes"</u> - In section 2 sub-section 2.1.1 (ii) sand dunes were mentioned.</p> <ul style="list-style-type: none"> • Most of the coastal areas in AP state particularly Prakasam district will have sand between LTL and HTL. <u>Does this mean whole AP state and district Praksam costal zone falls into CRZ-I A category?</u> • Is there any dimension factor of the sand dune that specifies sand dunes that are larger than certain size is considered as CRZ-I and rest in CRZ-II/CRZ-III? <p><u>Need further clarity on approvals needed for beach resorts/hotels with buildup area that is less than 20,000 sq. mt.</u></p> <p>As per section 7 and sub-sections (iii) all permissible/regulated activities in CRZ-II and CRZ-III can get the CRZ clearance from concerned CZMAs (state level CZMA). And at the same time it also mentioned "traversing through CRZ-I and/or CRZ-IV areas.</p> <ul style="list-style-type: none"> • How do you define "Traversing through" in this context? • If there is sand in CRZ-II or CRZ-III are these considered as CRZ-I 'A' automatically because sand is considered as sand dunes? <p>And as per section 7 and sub-sections (iv) project that fall under category 'B' of EIA Notification 2006</p>

			166	Lourdes gomes	I am objecting to the said proposal at Goa. Rivers are our bloodlines. Goans can't exist with them. This plans will destroy the very essence of the coastal areas. go. You know well that it will destroy the coastal belt with till buildings and the locals will have nowhere to
			165	Romeo Coelho	I would like to my opposition to the above plans. I do not to list the draw back of this plans. You know well that it will destroy the coastal belt with till buildings and the locals will have nowhere to
			164	Blanche FC	This is bringing to your notice that the above mentioned CRZ PLAN to reduce to 50 metres from high tide level is not in the right perspective. Would kindly request to scrap the plan as we local will be affected along with the fishing community. You will have displaced all locals with Migrant. The sea water is rising and when your development on the beach areas all debris will be littered elsewhere. As it is now we have water and electricity shortage. From where will you generate water resources to supply.
			163	Viriato Fernandes Capt. VHM Fernandes	I have studied in depth the draft that is in public domain for scrutiny and I register my strong protest against this draconian draft that will eventually destroy not only the coastline of Goa but also that of the entire country, and along with it, the livelihood of thousands of fishermen who are dependent on our seas and rivers. I am a retired naval officer settled in this beautiful paradise on Earth. I was aghast to read about the draft CRZ notification that your directorate under your command has put up for peoples' response. Kindly scrap this draft notification with immediate effect.
			162	Antonio Fernandes	No specific Comments
					Do I need to get any CRZ clearance from state CZMA or SEIAA if my built up area is less than 20,000 sq. mtrs? Clarity for small beach resorts/hotels is lacking. can get approvals from concerned CZMA and SEIAA. But category 'B' does not specifically talk about beach resorts/hotels. If we assume/interpret that Item No. 8(a) of the schedule of the "EIA Notification 2006 - Building and Construction projects" is applicable for beach resorts/hotels, then this item is only talking about built up area that is greater than or equal to 20,000 sq. mtrs and less than 1,50,000 sq. mtrs. Then the question is if I am planning to build a beach resort/hotel that is far less than 20,000 sq. mtrs can I just get NOC from local panchayat or municipality or corporation and build it?

167	Deepak Rathod Vice President (Technical Services) TRIMEX	<p>4 (viii) Mining of sand, rocks and other sub-strata materials except,</p> <p>(a) Those rare minerals not available outside the CRZ area.</p> <p>(b) Exploration and exploitation of oil and natural gas.</p> <p>1.9 (i) (c) Annexure -1. Mining of sand from sand dunes is a prohibited activity except for the removal of rare earth minerals with proper replenishment backfilling using the tailings or other suitable sand.</p> <p>1.9 (ii) annexure -1 Mining of beach sand is prohibited except for the removal of rare earth minerals with proper replenishment backfilling using the tailings or other suitable sand.</p>
168	Yogesh Mahadeo Gosavi, Section Officer, Housing Department, Mantralaya, Mumbai	<p>Required changes to proposed provisions</p> <p>5.2 (ii) Construction of buildings for residential purposes, schools, hospitals, institutions offices, public places etc. Shall be permitted only on the landward side of the existing road or on the landward side existing authorized fixed structures or landward side of protected structures under any central or state laws; provided that no permission for construction of buildings shall be given on landward side of any new roads which are constructed on the seaward side of an existing road;</p> <p>5.2 (iii) Buildings permitted as in (ii) above, shall be subject to the local town and country planning regulations as applicable from time to time, and the norms for the Floor Space Index or Floor Area Ratio prevailing as on the date of this notification as applicable from time to time. It shall be the responsibility of the concerned Town Planning Authority to ensure that the Solid waste are handled as per respective SWM rules and no untreated sewage is discharge on to the coast or coastal waters.</p> <p>5.2 (iv) Reconstruction of authorized buildings and/ or protected structures under any central or state laws shall be permitted without change in present land use in consonance with the land use permitted in the local Development plan, subject to the local town and country planning regulations as applicable from time to time, and the norms for the Floor Space Index or Floor Area Ratio, prevailing as on the date of this Notification as applicable from time to time. It shall be the responsibility of the concerned Town Planning Authority to ensure that the Solid Wastes are handled as per respective SWM rules and no untreated sewage is discharge on to the coast or coastal water.</p> <p>10.3 (i) In order to protect and preserve the “green lung” of the Greater Mumbai area, all open spaces, parks, gardens, playgrounds indicated in development plans excluding those on notified/censuses/declared slums or Slum Rehabilitation Area, within CRZ-II shall be categorized as No Development Zone, a floor Space Index up to 15% shall be allowed only for construction of civic amenities, stadium and gymnasium meant for recreational or sports related activities and the residential</p>

		or commercial use of such open spaces shall not be permissible.
169	Kevin DeSouza	Please note my objection to the recent drafted modification on CRZ regulations. If this draft is taken forward the locals will have no access to go to the coast and there will be no freedom to locals to have social activities.
170	Rayna dmello	We do NOT want Goa to be developed in such a way that it will not sustain life. Save our rivers and the delicate ecological balance that is still thriving in this beautiful state.
171	Gracy Abreo Bardez GOA	On behalf of the coastal people and fisherfolk i.e. National Fishworkers' Forum's I write this letter drawing your attention. It is most disturbing that while environmental problems are irrefutably increasing due to human activities to the scale of threatening the survival of life itself, changes to the CRZ laws are being proposed that will dilute the protection given to the environment and the coastal people, only to increase the industrialization and concretization of the coast. This decision is completely dangerous and against nature.
172	Jai Hiremath + 9 representations	There are very few areas in CRZ-III with high density population. Standard NDZ of 50 meter should apply. There is tremendous scope of development of tourism industry, which shall ensure huge employment opportunity for rural communities. This will reduce mass migration to urban cities and ease the pressure on the infrastructure of already saturated cities.
173	Mamballi builders pvt ltd + 16 representations	We notice that there is a lack of clarity on the demarcation of High Tide Lines. as demarcated by the NCSCM in accordance with the laid down procedures and made available to various coastal States/UTs. There are several properties which are now low lying in backwater areas. The salinity intrusion is prevented by bunds constructed. However due to damage of bunds, saline water intrusion occurs in low lying areas causing mangroves to grow. In such areas can it be said that HTL will be upto the land where the land boundary is available and the submerged land will be the land between HTL and LTL. If such a view taken, then the owner of the submerged land cannot make use of his land which he should be permitted to use. 2. The shoreline changes will not affect the property rights of a person. If any land is submerged, he has a right to reclaim the same. He has a right to construct boundary wall separating his land with the waterbody. The revenue records which show the classification of the area as "land" will show the said boundary of water body. Since the land owner owns the land by investing funds to purchase and is paying land tax, he has a right to use the said property and the same cannot be taken away otherwise than

		<p>by acquiring the land.</p> <p>3. Recommendations of Shailesh Nayak Committee which deals with significant recommendations that no restriction on mangroves on private owned lands is not considered, As per Clause 3.11.5 (b) of the report For mangroves in private land, incentives shall be provided by the concerned State/UT Forest Departments for promoting mangrove conservation/afforestation in private land, for which there will be no requirement of a buffer zone. The developmental activities in the private mangrove land can be taken up. This recommendation should be included in the Coastal Regulation Zone management plan</p> <p>Further, we request you to kindly permit us an opportunity of <u>personal hearing</u> being heard <u>exclusively</u> in this regard and to kindly include proper provision for measuring the HTL from the outer boundary of the private property and to include the above recommendation of the Shailesh Committee irrespective of the fact whether saline water is entering in to the land or not.</p>
174	<p>President: Gauresh Maddo Gaude Organisation: Amreshwar Pragati Manch + 1 representation</p>	<p>Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.</p>
175	<p>Joji Kuttickal for coastal community kadamakudy village</p>	<p>CRZ restrictions may not be insisted on the following circumstances or if it not falls within the following criteria</p> <ol style="list-style-type: none"> 1. Exemption should be given to villagers born and brought up in kadamakudy village. 2. Inhabitants from forefather's time in such locality. (In my case, I have two brothers and our family property land is near to Periyar River. Now we are in situation not able to do construction in our family land which we got from our father due to CRZ notification. After some years I have to give the property to my childrens as share.... Hope you understood the situation and difficulties) 3. Villagers living here from certain years of time. (say more than 10 years and those who are

<p>4. For others, allow 500-850 sqft. construction. (which will help tourism industry as well, to paying land tax for the last 10 years)</p> <p>construct resorts compliance with tourism development standards)</p>		
<p>The Coast of Gulf of Mannar in Tamilnadu, an ecologically sensitive Biosphere approved by UNESCO (MAB Program) is divided into multiple smaller fragments like CRZ I(A, IB), CRZ II, CRZ III (IIIA/IIIB), CRZ IV (IVA, IVB) covering the districts of Ramamathapuram, Tuticorin, Tirunelveli, Kanyakumari and new clauses are added to relax permissible activities in CRZ areas. We are of the opinion and kindly submit further that this division and relaxation has invariably paved way for the exploitation of the coast. We kindly remove such fragmentations relaxing clauses for the Coast of Gulf of Mannar.</p>	<p>Simson R Rameswaram</p>	<p>176</p>
<p>2. We also believe that the Gulf of Mannar, a Marine Biosphere, falls under CRZ-I in total and not CRZ IV (A/B) as reflected in the 2011/2018 mapping.</p> <p>3. Denying the CVCA (Zone V) CRZ 2011 rights of the Coast of Gulf of Mannar in CRZ 2018 is only going to pave way for continuous further destruction of the coast which has already reached its Resilience limits as reported by some firms and proved by dying corals, missing species, decreased fishing resulting in increased conflicts between fishermen groups and sinking islands. As fishermen, we have the rights to protect our valuable coasts. Therefore, we will much grateful if our point of view is considered positively by giving back our rights.</p> <p>4. Kindly consider our request to plot Corals, Pearl Banks, Fish Breeding and Fishing Zones in maps, and also retain pollution mapping of the sea as per CRZ 2011 in CRZ 2018 notification.</p> <p>We were taken by surprise to know When CVCA rights of Kerala and Maharashtra are discussed in detail by their respective Coastal Zone Management Authorities. It is highly deplorable why the same is not imitated by the TCZMA till date as per CRZ 2011. We expect and request the Ministry to do needful in our point of view.</p> <p>We would like to record here that the stakeholders of the coast of Gulf of Mannar including coastal communities are mostly illiterate fisherfolk who are not only consulted but also not explained in full on our rights in CRZ 2011 by showing false datas & mapping. Hence some of them had been</p>		

		<p>invariably pushed to enroll their objections on the same.</p> <p>We kindly request you to give back CVCA (Zone V) rights of Gulf of Mannar as per CRZ 2011 in CRZ 2018 to save the Coastal Inhabitants, Marine Biosphere and IMPs to be made in consultation and detailed discussions with the Stakeholders / Fishermen Groups, Coastal Representatives considering the present and future developmental needs as intended by the Coastal Regulation Zone Notification.</p>
177	Mansukhbhai Shekhada	<p>Firstly, we are grateful for the government to initiate procedure to resolve the CRZ issue which was a big speed breaker in the path of development.</p> <ol style="list-style-type: none"> 1. River Tapti is passing through the city of Surat and meets Arabian Sea. Due to Ukai Dam, Kakrapar weir and Weir-cum-causeway constructed over River Tapti, the river water is retained at Causeway near Singanpore. As a result, backwater from Arabian Sea infiltrates through River Tapti raising salinity by more than 5ppt. Intrusion of Sea water is for a length of nearly 25.00 km which is certainly very long distance. This resulting into large area of Prime land remaining undeveloped. Further considering the specific nature of the city, (river Tapti is flowing between the city), request to give special consideration or exemption in CRZ affected areas for construction in Surat City of Gujarat. 2. As the area falls under already developed municipal limit it is requested to mark the area under CRZ II. 3. In our country, land has remained a state subject. The Government of Gujarat has enacted common general development control regulations (GDCR) which restricts development on the river bank for a distance of only 30.00mt where there is no bund/retaining wall and only 15.00 Mt from river boundaries where there is bund or retaining wall. 4. In the aforesaid notification 50.00 Mt margins is proposed from high tide line. We propose you to reduce the same up to 30.00mt where there is no bund/retaining wall and 15.00 Mt where there is bund/retaining wall which will be in synchronisation with common General Development Control Regulations(GDCR), Gujarat. 5. Surat Municipal Corporation has implemented town planning schemes in the entire city. Area adjoining river boundary also falls under T.P. Schemes. While preparing T.P. Schemes nearly 40% of land is allotted to local authority for development of infrastructure such as roads, play grounds, school, health centres and other utilities. After losing 40% of land, additional 50.00mts of land restricted for development under CRZ results into huge financial losses to the land owners/developers. Under the circumstances you are requested to consider the T.P. Schemes

<p>6. Surat Municipal Corporation has already implemented town planning scheme in the area where we possess land (Survey No. 1001/1, District-Surat, Taluka-Majura, Village-Dumas). Already, 40% of the land is allocated to the local authority according to the regulations. The town planning was done according to the Town Planning Committee and DLR (District Inspector of Land Records) after proper analysis and research of Tapi River and the surrounding environment, assuring that no harm and damage is done to the environment and river in any way. According to the scheme, a road is proposed alongside the river boundary. Our land is adjoining the proposed road. As the road will be constructed on the coastline, the restriction for land under CRZ shall not be applied to such pieces of land. If additional 50 metres of land is restricted, we shall be left with no land at all. It would be a disastrous financial loss for us.</p>		
<p>(i) The land area from High Tide Line (hereinafter referred to as the HTL) to 500 mts on the landward side along the sea front. Suggestion: In areas where Government agencies have constructed structures such as bunds or holding ponds for prevention of saline water intrusion, boundary of such structure towards creek/sea and bund line shall be considered as HTL. (ii) CRZ shall apply to the land area between HTL to 50 mts or width of the creek whichever is less on the landward side along the tidal influenced water bodies. Suggestion: Tidally influenced water bodies will not include man-made structures such as ponds constructed for storm-water management. 2.2 CRZ-II shall constitute the developed land areas up to or close to the shoreline, within the existing municipal limits or in other existing legally designated urban areas. Suggestion: Areas included in approved regional development plans for residential / commercial / industrial purpose shall be considered as CRZ II. Annexure-I CONSERVATION, PROTECTION AND MANAGEMENT FRAMEWORK FOR ESAs 1.1 Mangroves (ii) Mangroves not declared under Forest Conservation Act, 1980. Mangroves in Government land shall</p>	<p>Dr. Vijay Kulkarni CSO and Sr VP ESH & CSR Shapoorji Pallonji Infrastructure Capital Company Private Ltd (SPINFRA) SP Centre, 41/44, Minoo Desai Marg, Coloba, Mumbai 400 005 Cell : 96199 26980 / 98212 16833, TF : 022 6749 0167</p>	<p>178</p>

		<p>be protected based on a detailed plan to be prepared by the concerned State/UT Governments. Suggestion: Mangroves which have grown as weeds in Government / Private land as a result of saline water ingress shall not be included in ESA.</p>
179	<p>Priya Gupta Manager - Env GHCL Ltd Sutrapada - 362275 Mobile no : 9099093096, Landline : 02876 - 265328</p>	<p>500 mts along the coast (500 restrictions for development) 100 mts along the tidally influenced water bodies (100mts restricted zone for development)</p> <p>Reclamation (Except Port area)</p>
180	<p>Sunil Gupta Laxmi organic Industries Ltd. Mumbai</p>	<p>Pipeline and storage tanks are set up in the port lands, as they are connected to the jetties and Ports. As these infrastructures are interconnected to each. Therefore it should provided at the same time in same portal.</p>
181	<p>Mohan Panicker + 11 representations</p>	<p>We suggest that products which are similar to 17 products in Annexure II, should be allowed to handle. Every product is transferred to tank is being handled through the Port jetties and pipeline on port land. Similarly, tankages can also be used to store the same.</p>
182	<p>Tania Devaiah</p>	<p>Draft opens up off limit areas for commercial exploitation. NDZ should not be reduced. It is a regressive measure. CRZ-I should not be sub-divided into A & B. It should be off limits for any development except national security or emergency. In view of poor record of waste management and water pollution treatment, facilities for waste and effluents may not be permitted in riverine and coastal areas in CRZ-I. Eco-tourism activities such as tree huts would also require toilets, sewage etc., which will be damaging to the environment and should not be permitted in the ESA. Schools, Dispensaries and community toilets should not be permitted to be built in the buffer zone between 100-200 meter of CRZ-III. Memorials/monuments should not be permitted in CRZ-IV. Environment is more important. Dispensing with the requirements of examination by CZMA in respect of self-dwelling units upto 300 sq. mt., does not look at traditional occupational rights but for the benefit of healthy land owners and stakeholders. Punitive measures should be defined for violations of the Notification. CRZ for backwater Islands should be same as that for main land as backwaters do not follow different rules of nature. Mangrove buffer should be provided irrespective of whether they are in a private or a public area.</p>

<p>Buffer zone should be prescribed for turtle nesting sites and horse shoe crab habitats as well.</p>		
<p>1. The traditional right of indigenous fishermen in their coastal dwelling habitats is not seen protected in the draft notification CRZ 2018 against that ensured in the CRZ 1991. If it is not protected, it will definitely affect their livelihood and food security gradually sinking them to oblivion.</p> <p>2. The liberated approach permitting to enter into virgin mangrove areas in the name of eco-tourism will not be conducive for conserving the unique ecological habitat and biodiversity evolved there spontaneously over long periods of time. Detrimenting such centres of biodiversity will prove to be a bane for the fishers not only to earn their livelihood, but to the food security of the nation too. Therefore, it is absolutely necessary to conserve and retain such areas for biodiversity protection and proliferation.</p> <p>3. With a view to offering coastal stability, promoting primary productivity and enhancing coastal fisheries production perpetually, it is advisable to establish bio shield at a width of 10 metres all along the coast of India using potential mangrove species, Casuarina sp and cashewpalants.</p> <p>4. As a measure to maintain undisturbed equilibrium balance enhancing sustainable biodiversity, reclamation of any kind may not be permitted at any cost along CRZ areas, except for unavoidable government purposes, if any.</p> <p>5. It is advocated to retain sand dunes and meadows prevailing along the beaches in addition to preventing sand mining, ensuring protection of costal belt.</p> <p>6. The categorization of zones made in the draft notification seems to be unscientific when compared with that of CRZ, 1991. Subdivision of zone III on the basis of density of population of 1991 census may lead to further disputes. Hence it is to be nullified. Besides, the proposal to establish memorials/monuments in the sea (CRZ IVA) is also superfluous and may be deleted.</p> <p>7. The wayward relaxation allowed for construction of buildings in different zones does not seem to</p>	<p>Janoos Thevalil Prof (Dr) K.S. Purushan</p>	<p>183</p>

		<p>keep up a balanced approach. Emphasis needs be given to maintain coastal stability and undisturbed equilibrium while undertaking construction of any kind. However, due relaxation / exemption from rigid rules may be given to bonafide residents and marginalized people to construct their own dwelling units of standard size (200m²) especially availing financial support/grants from government for the purpose.</p> <p>8. Too much liberalized approach on construction towards promoting tourism in the virgin undeveloped coastal belts will not be healthy to safeguard environmental protection. There is misgiving that such activities would promote encroachers to enter into the fishing hamlets and colonies. Such action would detriment the calmness and serene environment prevailing there enabling peaceful life. It is better to avoid it for peaceful coexistence of the fisherfolks.</p> <p>9. The determination of the HTL & LTL and preparation of CZMP may not be made complicated by designating the name of a supreme national agency. Rather, the crucial task may be entrusted with the respective state government agencies to get things done easily observing rules in force.</p> <p>10. Rather than promoting concretization, it is advisable to adopt green technology for encouraging tourism in the coastal sector.</p> <p>11. Keeping silence on undertaking HRD components along coastal areas seems to be a drawback of the draft notification. It is advisable to promote education and empowerment programmes in the coastal areas to help millions against giving undue of enthusiasm in the name of unscientific tourism promotion.</p>
		<p>12. In association with fisherfolks and coastal dwellers, chalk out mass involved viable pragmatic programmes transforming coastal belt into harmoniously functioning bio-resource generation centres of variety crops rather than places of perpetual dispute.</p> <p>13. The land grabbing by unknown persons and agencies along the coastal belts is to be arrested</p>

<p>forthwith towards protecting the bonafide dwellers proceeding with their livelihood enterprises.</p> <p>14. Irrespective of any modification and changes envisaged, it is advisable to retain fisherfolks in the coastal areas for sustainable coastal management. By virtue of their rendering selfless and yeoman services to the nation, they safeguard and protect the coastal security while bravely engaged in the livelihood earning enterprises both during day and night. Hence, it is a must to establish the right to occupy on the place of their birth.</p>	<p>Include proper provision for measuring the HTL from the outer boundary of the private property and to include the above recommendation of the Shailesh Committee irrespective of the fact whether saline water is entering in to the land or not.</p>	<p>We have observed that two new products i.e. Acetic Acid and Mono Ethylene Glycol have been added in the list of products permitted in CRZ areas as per Annexure II.</p> <p>Many other liquid products which are similar in nature to the products mentioned in Annexure II and other products which are similar or less hazardous compared to products mentioned under Annexure II should be allowed to be handled through the Port Jetties and pipelines should be handled by these storage terminals located in Port land and connected to such jetty.</p>	<p>In Para 2.2.1 a (iv), biologically active "mud flats" should be replaced by mud flats.</p> <p>In Para 4 (ix) "active sand dunes" to be replaced by sand dunes.</p> <p>Temporary tourism facilities should be permitted only for limited period.</p> <p>Memorials within CRZ-IV should not be permitted.</p> <p>STPs in CRZ-I B should not be permitted.</p> <p>Tree huts should not be permitted in mangroves.</p> <p>NDZ should not be diluted.</p>	<p>The entire area where the land area up to 50 mts from HTL shall be earmarked as NDZ in CRZ III areas.</p>	<p>The No Development Zones (NDZ) should not be reduced to 50mts from its existing 500mts as mentioned in the new draft CRZ Notification 2018.</p> <p>The NDZ for all rivers has to be more than 200 mtrs. Provision of NDZ 100mts has failed considerably</p>
				<p>Ashish vaid Mumbai</p>	<p>187</p>
				<p>Joseph Vijayan</p>	<p>186</p>
				<p>Rangnath Mapare C J Shah & Co, Mumbai. Tel: - 022 43436900 Mob:- 09867295435+3 representations</p>	<p>185</p>
				<p>Sobha Tambaram Developers Limited Nungambakkam, Chennai - 600034</p>	<p>184</p>
				<p>Sanjay Redkar</p>	<p>188</p>

		<p>and as such the NDZ cannot be reduced to 50mts. However, it should be increase to 200mts to preserve our rivers which are the lifelines of human survival.</p> <p>This draft CRZ Notification 2018 does not conserve and protect coastal stretch, its unique environment and its marine area which are a livelihood for the backward/fishing community/farmers but is making ways for destruction and displacement of the local backward fishing community and the farmers.</p> <p>I demand that this CRZ notification be scrapped due to the above reason and submit a detail study on following.</p> <ol style="list-style-type: none"> a) the rising sea levels b) impact of sewage on our rivers/sea c) Impact of pollution on the beaches/rivers d) Scientific study on environmental impact within the new prescribed NDZ limits of 50mts. e) Scientific study to protect and control the destruction of the natural environment with respect to the new NDZ of 50mts. f) Scientific study for sustainable Development in the 500mts CRZ. g) Scientific baseline study on the environmental effects/damages caused by the growing human population in the 500mts CRZ. h) Scientific baseline study of the water bodies, wells, aquifers in the 500mts CRZ and its impact on human/animals/environment consumption.
189	<p>Vinod Goswami Architect, The Oberoi Group 7, Sham Nath Marg, DELHI-110039 Mobile. +91 -9999915893 Landline 011-23890505</p>	<p>The discision of the Ministry of Environment and Forests to create a new Zone “CRZ-III A “and relax the “No Development Zone” setback from 200 meter to 50 meter in areas having a population density of more than 2161 per sq. Kilometer based on census of 2011, is indeed encouraging considering the pressure of urbanisation faced by people living in these areas.</p> <p>We, therefore, strongly recommend the Ministry of Environment, Forests and Climate change to re - consider its proposal and reduce the set back line from 200 meters to 50 metres in the No Development Zone in CRZIII-B areas in new CRZ regulations.</p>
190	<p>Sivavizeane Sivaramane Pondichery</p>	<p>Occurrence of sand dunes on sandy coast is very common because of West Coast of India is totally different from east coast. Technically dunes are not Eco sensitive area. It was added in CRZ I only after 2011.</p> <p>Allow temporary structures within 50 m of NDZ and reduce NDZ from 200 m to 50 m in CRZ III which is only more vulnerable, consider temporary accommodation, Tourism based accommodation, Tourism based construction on silts on sand dunes (without disturbing). At least beyond 100 mt from HTL.</p>

			To promote tourism belt of Mahaballipuram –Pondicherry.
191	Simon P. Ittera	I am submitting this representation on behalf of a number of people in the Island. The entire island area is populous. People are having very small land holdings. Apart from sea coast (west side) and river coast (East side), the island is having pokkali rice cultivation fields in the middle of the island. The lands bordering these fields are regulated by 35 Mtrs for construction of building / houses under the Act. This has been done by without applying area-wise study of the island. No sea or river disturbance affected in this area. A number of people living in this area are affected by this regulation of 35 Mtrs. I humbly request to consider for reducing the regulation from 35 Mtrs to 10 Mtrs so that people in the area can lead a peaceful life.	
192	Tomny Barret	My objection to the CRZ. Notification	
193	Kishor Gawani	2018 notification is not in favor of fisherman communities. Tourism should promote towards the landward side. In this 2018 notification there is no for the fishing wheels and fishing harbor while you are encouraging only the port facilities.	
194	Surat builders' association Jasmathai Vidya +91 98258 20000 Chairman, Credai	Give special consideration or exemption in CRZ affecte areas for construction in Surat city of Gujarat. Tidal influenced water body is restricted up to mouth of Arabian sea only. Large amount of land can be utilized for development of housing projects. In the aforesaid notification 50.00 Mt margins is proposed from high tide line(HTL). We propose you to reduce the same up to 30.00mt where there is no bund/retaining wall and 15.00 Mt where there is bund/retaining wall which will be in synchronization with Common General Development Control Regulations. (GD CR), Gujrat.	
195	Savio D' Silva Above post office, Caramzalem – Ilhas, Goa- 403002.	I hereby state my STRONG OBJECTION TO DRAFT CRZ NOTIFICATION 2018.	
196	Vedang Tandel 101, Krishna Kunj, Lane No. 6, Dilip Nagar, Daman-396210.	Daman is a tiny territory and having only 10 Sq. Km for livelhood and business activity. Daman is having about more than 2500 population density Per Sq. Km and costal belt of Damam District, Specifically Devka Beach is Fully developed and provided with all basic infrastructural facility like Water Lines, Approach Road, Sewerage, Gas Line, Underground Electricity Line, Telephone/Optical Line. But due to restriction of CRZ-III. The tourism business cannot develop. Hence, we hereby request to	

		<p>classify whole Daman District in CRZ-II. So that the local traditional coastal community get relaxation to build up their residence and businesses.</p>
197	<p>Adv. K.X. Julappan Kalipparambil House, Chellanam PO, Kochi – 682008. Tel: 9496119649, Mail: julappan@gmail.com President, Chellanam Agri & Tourism Development Society President, Kochi Coastal Development Protection Forum</p>	<p>2.3.1 CRZ-III A: In case of an area not entirely suitable for construction purposes due to its geographical features, reduce the number of population density from 2161 to a number proportionate to the actual percentage of the land suitable for construction purposes within a square kilometre area.</p> <p>5.2 CRZ-II (i): Include the construction of small provisional or tea shops, small self-employed shops, offices or workshops and workshops for traditional jobs of the local community.</p> <p>5.3 CRZ-III (2) (f): Include the construction of small provisional or tea shops, small self-employed shops, offices or workshops and workshops for traditional jobs of the local community, community halls, and any other constructions which are necessary for the normal life of the local community other than hotels or resorts.</p> <p>CRZ 1 & CRZ VI: CRZ clearance should be considered at the level of the CZMA of the States for Measures for control of erosion, such as groynes, retaining walls etc.</p>
198	<p>K. Devarajan Rtd. Chief Town Planner. Thiruvananthapuram. Kerala</p>	<p>The settlement pattern of the traditional fishermen society in the State, high population density is usually seen in their habitat only and it may not be seen in the entire stretches of 500-meter width of CRZ in different Grama Panchayat. So the total gross population density may vary from one Grama Panchayat to other and hence there are very high chances of neighboring Grama Panchayat having same pattern of fishermen settlement shall fall in different type of CRZ-III category.</p> <p>It is suggested that for entire Kerala State the condition of CRZ-III-A may be enforced in the rural areas.</p> <p>It is suggested that after preparing the Coastal Zone Management Plan for the state, construction of new low intensity residential construction for the local inhabitants and fishermen community may be considered in the new CRZ notification with condition stipulated as per the existing town and country planning regulation.</p> <p>Para 5.3. CRZ III, (iii) (c) add “traditional right of land and houses of the fishermen flock shall be</p>

		retained as it is. Suggested that provision of "permission by state Coastal Zone Management Authority for consideration of the regularization of newly constructed small residential building by poor local people and fishermen in the coastal stretches of No Development Zone of CRZ-III areas, by using the funds from the housing schemes of Central and State Governments and local bodies of the State" may be included in the proposed draft CRZ notification (2018).
199	Henry Pinto	Object to all unwanted development as Government is doing
200	K.S.Purushan	The traditional rights of indigenous fisherman in their coastal dwelling habitats are not seen protected. Mangroves areas in name of eco tourism will not be conducive for conserving the unique ecological habitat. Established the bio shield at a width of 10 m all along the coast using potential mangrove species, casuarina sp. And cashewplants. Don't subdivide the CRZ III areas and in CRZ IV memorials /monuments clause should be deleted.
201	Arun srakath	Give permission for renovation cum expansion of existing homes irrespective of coastal distances. New building permit may be issued by executing demolition agreement irrespective of coastal distances. Sanctioning power may be given to Panchayats. Semi-permanent structures may be allowed in the coastal shore.
202	Kochumathew M joseph	Give permission for renovation cum expansion of existing homes irrespective of coastal distances. New building permit may be issued by executing demolition agreement irrespective of coastal distances. Sanctioning power may be given to Panchayats. Semi-permanent structures may be allowed in the coastal shore.
203	Arun Sivaraj	As per the provisions of existing CRZ-2011 notifications, Mining of Atomic minerals is permitted in CRZ areas and only manual Mining of Atomic minerals is permitted in CRZ-1B area. But, in this draft notification, manual mining of Atomic Minerals only is permitted in CRZ-1B and other areas. Manual mining is not possible in CRZ-II, CRZ-III and CRZ-IV area. Hence, mechanized(without drilling & Blasting) mining of Atomic Minerals may be inserted in order to extract the minerals viz.Monazite, Rutile,Leucocoxene, Zircon, Garnet & Sillimanite in scientific & sustainable manner.
204	E. Martin Martin.elmo@gmail.com	Please refrain from carrying out this project.

205	Shanith. K	<p>I belong to malappuram district of Kerala state residing under CRZ-III rule of the panchayath. Due to the limitation of the CRZ-III rule, I could not get permission for commercial building at my native place. Being populated area the restriction may be relaxed to limit above 200 mtrs. Many applicants are waiting for your relaxed order of limitation to 200 mtrs from sea shore.</p>
206	Prakash Yadhav	<p>Infrastructure developments should be permitted after 50 meters Zone of HTL in the land side.</p> <p>Yacht Parking and Marina development should be permitted in the 50 meters Zone of HTL.</p> <p>After 50 meters to 100 meters of HLT tourism activities should be permitted and also required infrastructure can be permitted.</p> <p>After 100 to 200 meters of HTL, 30-meter height buildings can be permitted. After 200 meters' special buildings or high raised can be permitted.</p> <p>Development should permit between 50m to 500m zone.</p>
207	Nandan Pilgaonkar	<p>In the Draft Notification, all areas under CRZ-III B, the area up to 200 metres from the HTL on the landward side is proposed to be earmarked as the No Development Zone (NDZ).</p> <p>It is suggested that in areas under CRZ-III B, the NDZ should be 100 metres from the HTL to enable reasonable yet controlled spread of development on the landward side in sparsely populated areas.</p> <p>In the Draft Notification, no distinction is made between areas situated at a height above the water body levels (e.g. areas on cliffs, plateaus, etc.) and area situated on level with the water body.</p> <p>It is suggested that in areas situated in CRZ-III A and CRZ-III B, the NDZ should be restricted to 50 metres from the HTL in cases where the areas are situated at a perpendicular height of 15 metres or more from the shoreline of the water body.</p> <p>It is further suggested that in view of the perpendicular height of 15 metres or more from the shoreline of the water body height of buildings permission for such construction or reconstruction will be subject to local town and country planning rules with overall height of construction not exceeding 15 metres including ground floor /stilts reserved exclusively for vehicle parking.</p>

<p>208</p> <p>Chief Officer, Malvan Municipal Council, Dist: Sindhudurg. Phone no.02365252934</p>	<p>JPR Romalt Address in Regional Language</p>	<p>209</p> <p>Related to Gulf of Mannar (Language can't read/understood)</p>	<p>210</p> <p>Saleem Groups LENSFED. Licensed Engineers & Supervisors Fedcration Kerala</p>
<p>208</p> <p>Include CRZ II area in municipal limit Malvan Municipal area needs to be repaired/ reconstructed, therefore include the clause as per requirement. Delete the Malvan city from CVC area as per clause no 3.3.1 CRZ Notification 2018.</p>			<p>1(i) The land area from High Tide Line (herein after call HTL) to 500Mts 200Mts on the landward side along the sea front. 2.3.1.CRZ-III A Such densely populated CRZ III areas, failing with, a NDZ of 200Mts 100 mts. shall continue to apply. 4 (i) Setting up of new industries and expansion of existing industries (not more than 25% area, expanding to the land ward side), operation or processes. 5.2.CRZ-II (i) Construction of buildings for residential purpose school's hospitals, commercial buildings, institutions, offices, public places etc shall be permitted only on the landward side of the existing road, as on the date of this notification, or on the landward side of the existing authorised fixed structures; ... 5.2.CRZ-II (iv) Reconstruction of authorised building shall be permitted, without change in the present and use subject to the local town and country planning regulations as applicable from time to time, 5.3.CRZ-III(iii) b Construction or reconstruction of dwelling units so longwith overall height of construction of not exceeding 9Mts-12Mts. with two floors (ground +one floor) (ground +two floors) 7(i) All permitted/ regulated project activities beyond the 200 Mts from the HTL attracting the provision of this notification shall be required to obtain CRZ clearance prior to their commencement. 7(vi) Only for self-dwelling units to a total built up area of 300-sq-mts 500 sq mts approval shall be accorded by the concerned local state or union territory..... 8 Only some Agencies are identified by the MOBF & CC for drawing of the CRZ map. All the building owner and developers are approaching these Agencies, so they need more time for preparing the drawing and they are demanding very huge fees also. Hence the Procedure for CRZ clearance for the permissible/regulated activities must be simplified for buildings having plinth area up to 1000 M2 and up</p>

		to 5 floors or 16Mts height.
211	Nivin Andrews	We have resided besides approximately 40 meter from Kaithapuzha river for more than 60 years. New rules have made on us to opposite to make a new home. So I humbly request to reduce the length area from river side to make a new home.
212	Jude Joseph CADAL (Coastal area development agency for Liberation) Kerala	<p>Permitting the construction of dwelling units within the NDZ of CRZIII</p> <p>There was a long standing demand from the traditional coastal communities including fishing community that to construct houses within the approved size, height, including the NDZ area permit to <i>'construct/reconstruct dwelling units of traditional coastal communities including fisherfolk'</i> [5.3. ii. (a)].</p> <p>The Draft calls for <i>'incorporating necessary disaster management provisions'</i> [5.3. ii. (a)] while constructing houses within NDZ.</p> <p>strictly prohibits disposal of plastics into coastal waters and orders for managing this problem [4. (x)].</p> <p>The Draft has simplified the clearance of small dwelling units of area within 300 sq mts by delegating the right to <i>local authorities to accord approval</i>, without the requirement of recommendation from CZMA [7.vi].</p> <p>One of the conditions laid up by the Draft in regularizing the dwelling units is that <i>'these are not sold or transferred to non-traditional coastal community'</i> [9.iv (b)].</p>
213	Fax Kerala Minerals and Metals Ltd. Kerala, India	<p>Para 5.1.2 (xii): CRZ. IB</p> <p>The Beach sand that is mined is being replenished in every season. The beach sands will be collected by open cast method by engaging wheel loder.</p> <p>Manual removal of Monozite from the intertidal area increase radiation risk to workers.</p> <p>Drop the proposal of only manual mining operations by developing persons using baskets and hand spades for collection of beach washings within the intertidal zone and banning of deploying Heavy Earth Moving Machinery in the Intertidal zone</p> <p>since CRZ notification, 2011 provides for the provisions relating to mining of rare minerals at para 3 (X-a) that mining of rare minerals, which is not available out side the CRZ area, is a permitted activity and the proposed area i.e within the intertidal zone for mining is having concentrated heavy minerals (Rare Earths) deposits.</p>

<p>Allow the public sector units to carry out beach washing collection by any mechanised means as it is based on the recommendations in the report of Centre for Earth Science Studies (CESS).</p> <p>Para 7 (ii). CRZ clearance for permissible/ regulated activities</p> <p>This matter continued to be dealt by the CRZ regulatory authorities at the state level</p> <p>To allow the public sector units and govt. dept to carry out shore protection Measures in beach washings collection related areas as per the recommendations of the (IIT-M, Chennai/CWPRS, Pune) scientific study. w.r.t to beach cleaning mining area, from the draft CRZ Notification, 2018.</p>	<p>214</p> <p>Sajid Shaikh Goenchea Raponkaranchho Ekvott + 2 representations</p>	<p>215</p> <p>Dhiraj Ramesh (Journalist)</p>	<p>216</p> <p>Joseph C.de Souza</p>	<p>217</p> <p>Citizens of Velsao, Goa + 65 representations</p> <p>Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.</p>	<p>218</p> <p>Mrs. Aurea Fernandes HILLCROFT, H. No-99/O, Belloy, Nuvem, Salcete, Goa, olenrea@gmail.com</p> <p>The draft CRZ Notification 2018 must be scrapped and that the new CRZ laws must completely ban all hotels, industries, real estate and concretization in the CRZ, that the restriction of non-traditional activities must be increased and that the coast and her children must be protected totally. All past violators such as hotels and industries must be punished severely and the poor coastal dwellers whose homes were demolished by misuse of CRZ laws must be given their rights back.</p>
--	---	--	-------------------------------------	---	--

219	<p>Panchayat Munroethuruthu Grama Panchayath Kollam, Kerala</p>	<p>Special consideration and concessions is requested for Munroethuruthu Panchayath.</p> <p>Munroe Island, locally known as Mundrothuruth, isan amalgamation of eight small islands. It is a backwater Island panchayath ofKerala located at the confluence of Ashtamudi Lake and the Kallada River, inKollam district. 25 kilometers away from Kollam, the District Capital by road.</p> <p>Kallada River runs along northern side of the Island and remaining sides byAshtamudi Lake. Munroe Island has a geographical area of 13.4sq.kms, but thetotal land area is below 4 sq.kms.</p> <p>This panchayath is unique in many sensebecause of its natural beauty, waterways and numerous artificial interconnectingIt is an extremely backward panchayath which is also facing several environmental issues due to frequent flooding. Due to its particular topographical andgeographical features, land based connectivity fecilities like roads and bridges arevery few in number and people, down the ages, depend country boats and smallrafts for travelling and for bringing essential commodities home.</p> <p>For this purpose, they made numerous interconnecting canals, both through private and public properties, with width ranging from 3 meters to 10 meters, andthese canals are the lifelines of this place and without them, life is almost impossible here. People used to make houses on the narrow pieces of land among these canals here.</p> <p>As agriculture and fish farming are the main livelihood activities of the peoplehere, they also made numerous ponds and canals for fishing and farming.</p>
220	<p>General Administration P.H Kurian Additional Chief Secretary Kerala</p>	<p>1 (ii) CRZshall apply to the land area between HTL to 20 mts or width of the creek whichever is less on the landward side along the tidal influenced water bodies that are connected to the sea and the distance upto which development along such tidal influenced water bodies is to be regulated shall be 1 km in urban areas and 3 km for estuary or river mouth in rural areas and distance shall be clearly identified and demarcated accordingly in the Coastal Zone Management Plans (hereinafter referred to as the CZMPs).</p> <p>2.3.1 Such densely populated CRZ-III areas, where the population density is more than 2000 in panchayat per sq km as per 2011 census base, shall be designated as CRZ –III A.</p> <p>Include as a new provision:</p>

235

- Setting up of aquaria, oceaniums and facilities for research activities.
- Foreshore facilities like ports, harbour > 5 million TPA of cargo handling capacity and /or ports/ harbours 10,000 TPA of fish handling capacities.
- Jetties, wharves, quays, slipway, bridges which doesnot involve CRZ IA areas.
- Road on silts not passing through CRZ areas.
- Hatchery and natural fish drying.
- Atorm water drains.
- Treatment facilities for waste in areas outside CRZ IA.
- Small communities based desalination plant and associated facilities.
- Construction of roads and bridges over inland water bodies
- Categorised as CRZ IV not passing through CRZ IA.
- Boat building and repairing yards, fish loading center other than in CRZ IA areas.

5.2 (iv) Reconstruction of authorized buildings shall be permitted, without change in present land use, subject to the local town and country planning regulations as applicable from time to time, and the norms for the Floor Space Index or Floor Area Ratio, prevailing as on the date of this Notification. It shall be the responsibility of the concerned Town Planning Authority to ensure that the Solid Wastes are handled as per respective SWM rules and no untreated sewage is discharged on to the coast or coastal waters.

5.3 (ii) Reconstruction of dwelling units shall be subject to a maximum plinth area of 150 m²

5.3. (iii) (b) reconstruction of dwelling units so long it is within the ambit of traditional rights and customary uses such as existing fishing villages etc. Building permission for such construction or reconstruction will be subject to local town and country planning rules with overall height of construction not exceeding 15 mts. with four floors (ground + three floor);

5.3 (iii) (c) Construction of 3-4 floor residential apartment building under government projects like Rajiv Slum Development project shall be permitted subject to pollution obtaining measures.

5.3 (iii) (d) construction of building for livelihood activities like peeling of prawns, fish based small scale, non polluting cottages industries, / small shops and small flour mills etc. required for the coastal communities.

		<p>5.4 (i) Traditional fishing and allied activities undertaken by local communities and motorised, modified motorised and mechanised boats (having an engine power of less than 250 hp) in CRZ IV A.</p> <p>All permissible activities under CRZ notification (CRZ IB, CRZ II, CRZ III and CRZ IV) shall be considered by CZMA. The area traversing through CRZ IA, Clearance shall be considered only by MoEFCC, based on recommendation of CZMA.</p> <p>The provisions for spits and barrier beaches with the length more than 5 km and up to 17 km along the sea coast shall be covered under the CRZ Notification.</p>
221	<p>Rainbow warriors Jeronimo Dias Federation of Rainbow Warriors, Margao Goa</p>	<p>Reject the Draft CRZ Notification 2018 and start a lawful and people-friendly procedure for the preparation of a new CRZ Law that will facilitate sustainable development and conservation of our coasts.</p>
222	<p>Stalin D Director Vanashakti On behalf of Vanashakti NGO Mumbai</p>	<p>In section 5.2 of page 8, in sub point (iii), please elaborate on how will town planning maps address issues of coastal erosion and ecology?</p> <p>Point (f) of section 5.3 of CRZ III it says that temporary tourism facilities such as toilets, changerooms, drinking water facility and temporary shacks can be taken up on the seaward side of the road in places. Could you ensure that these facilities do not pollute the coastal waters? Incorporate load carrying capacity analysis to be done for every region before allowing unrestricted pressure on the landscape and resources.</p> <p>In same section point (g) fails to specify safeguard for treatment of waste generated in such the NDZ of CRZ-III areas. In Point iii (c) no mandatory buffer zones around fishing villages have been prescribed to be provided to address future needs of the community.</p> <p>In section 5.3, in point (iv), it is mentioned that "Restrictions for drawal of groundwater in areas between 200mts.-500 mts. of the HTL may be imposed by the designated Authority by State Government/UT Administration in the areas affected by sea water intrusion. Please specify whether state or centre will</p>

<p>permit. It should be noted that water resources are national property.</p> <p>On page 17, point 9 sub point (iv) (a) it should be noted that Storage and sale of fish is commercial activity which needs to be permitted.</p> <p>In section 10.2, point (ii) (a), the specific direction should have been introduced citing no increase in carpet /used area while reconstruction happens.</p> <p>In section 10.3, please mention why has this special emphasis on Mumbai been allowed. Please note that Mangalore is the city that will be first to be flooded due to sea level rise followed by Mumbai.</p> <p>Again on page 19, subsection 1.1 states that Mangroves in private land will not require a bufferzone. Only exception can be made for storage and use for storage of fishing equipment.</p> <p>On the same page in subsection 1.4, point says certain salt marshes having less biodiversity can be considered for salt pan activities. Please give clarification whether these salt pans will they be further used for construction or will they be revived as active ecological areas?</p>	<p>Salim Das, ILLIKKALAM House Kumarakom P.O., Kottayam, Kerala, 686563, Mob:9495735152</p>	<p>223</p>
<p>CRZ Limit Should Be Maximum 20 Meters Only, For The Entire Region of Kuttamad in Alappuzha and Kottayam Dist., Which Is Situated On the Southern Side of Thanneermukham Bund in Kerala State. Modify the limit from 50 Meters to 20 Meters for facilitating the fast and the regular growth of Backwater Tourism Destinations.</p> <p>The provision by which no development zone has been reduced from 200 mts from HTL on landward side in case of sea front and 100 mts along title influenced water bodies or width of creek to 50 mts under CRZ IIIA is against the aim and spirit of the Environment (Protection) Act, 1986 as well as original notification.</p> <p>Besides this, it is contemptuous as Hon'ble Supreme Court in its judgment dated 18.04.1996 in India Council for Enviro-Legal Action Vs. Union of India and Others reported in (1996) 5 SCC 281 has quashed the provisions of such a notification dated 18.08.1994. It is submitted that on this ground alone the draft notification should be withdrawn.</p>	<p>Vinod Kapur, No 1 Sagar Housing Society Dona Paula Goa - 4</p>	<p>224</p>
<p>Products which permitted to be handled through the jetties and pipelines should be allowed to be handled by tanks located in Port land.</p>	<p>Virendra indus Virendra Baidwal Indus Petrochem Limited</p>	<p>225</p>

	Mumbai.	<p>Add many other products which are similar in nature as mention in Annexure II. Permitt to handle similar products including these 17 products, as mentioned in Annexure II.</p> <p>It will give us an opportunity to explore more tank space for our different products and in turn will help in promoting business.</p>
226	Mr. Ajay T. Fulmali, Sr. DGM Environment Mumbai Metro Rail Corporation Limited, Maharashtra	<p>To ensure the permissibility of the Metro rail projects falling in any CRZ (CRZ I & CRZ IV) along with its essential allied activities including car shed, maintenance depot and workshop in all CRZ categories directly by incorporating clause of permissibility.</p> <p>Project needs to appraise at state level.</p> <p>Exception needs to be made for metro rail projects for drawing of ground water and construction related.</p>
227	Ridhima Singh	<p>a. Beyond NDZ FSI should be as normal local areas act.</p> <p>b. Beyond NDZ, CRZ must have no jurisdiction.</p> <p>c. Point 2.3.1 CRZ-III A – Goa has a very thin population hence the density to be considered as more than 800 per sq kms. most areas have also had population less than 2161 per sq km. With the current threshold no area will come under this.</p> <p>d. In the limitations of CRZ building individual residences must be allowed upto 500mtrs along with Cases of repairs, renovations and maintenances or reconstruction of existing structures should be handled at the Local CRZ level instead of MOEF and SEIAA. Point 8 (ix).</p> <p>e. In NDZ areas Security setup should be permitted. This along with Temporary cottages should be specifically mentioned as a permissible activity in private properties.</p> <p>f. Point 5.2 (vii) – Repair, reconstruction and maintenance of existing floor area should be allowed.</p> <p>g. Kindly include point 5.3 for temporary cottages</p> <p>h. For a better ocean view and enhanced look of the structures, the height restrictions in CRZ area should be increased to 15 mtrs.</p> <p>i. Approvals sanctioned by CRZ regulatory bodies post due diligence should be considered as the final decision.</p>

232	<p>S.Gopakumar, Architect President, Better Kochi Response Group PAST PRESIDENT, Indian Institute of Architects</p>	<p>SEA COAST coming under CRZ III</p> <ol style="list-style-type: none"> 1. For the sea coast minimum setback from HTL should be 100 metres 2. The allowed height of buildings should be 0.06 multiplied by the distance from the HTL. <p><i>For example, at 100 metre minimum setback you can go up to a height of 100×0.06 which is 6 metres. Accordingly, you can only build a two storied building.</i></p> <p><i>For a 5 storied building say 15 metres high you have to have a setback of 250 metres ($250 \times 0.06 = 15$)</i></p> <ol style="list-style-type: none"> 3. After 500 metres you must be able to go for any height. 4. An extra height of 0.6 metres should be allowed to take care of the plinth height. <p>BACK WATERS, LAKES, RIVERS AND CANALS</p> <ol style="list-style-type: none"> 1. For the above areas the minimum setback from HTL should be 5 metres 2. The allowed height of buildings should be 0.6metres multiplied by distance <p><i>For example for 5 metres setback you can go to a height of - 5×0.6 that is 3 metres</i></p> <p><i>Accordingly you can possibly build only a single storied building.</i></p> <p><i>For a 2 storied building you need to have setback of 10 metres</i></p> <p><i>For a five storied building of 15 metres height you need a set back of 25 metres</i></p> <ol style="list-style-type: none"> 3. After 100 metres there is no height restriction 4. An extra height of 0.6 metres should be allowed to take care of the plinth height <p>This system of graded separation restricts development proportionately as you go nearer and nearer to HTL.</p> <p>The visual impact of the coast line from the water also will look magnificent by this graded development.</p>
-----	---	--

<p>CRZ II is suggested on developed areas. Presently the set back can be same as that of neighbouring buildings as a development line. This leads to a lot of confusion as to the definition of neighbouring building. It is better to put a definite setback for buildings in CRZ II building. It is better to put a minimum setback of 5 metres.</p> <p>1. Single storied buildings can have a minimum setback of 5 metres.</p> <p>2. All other buildings without height restrictions should have a setback of 10 metres.</p> <p>Boat jetties in land or water can have restaurants, food and drinks counters, resting rooms, viewing galleries, three or four guest rooms, Small shops like book shops, beauty and health parlours, water sports facilities, souvenir shops, cloth and fancy goods shops, tourism offices etc</p> <p>SWIMMING POOLS and TANK</p> <p>Now with the concept of infinite pools swimming pools need only a set back of 1 metre only. Swimming pools use water filtration and recirculation and do not pollute surroundings.</p> <p>Similarly under ground tanks also need have only a metre setback</p> <p>The decision to include this area in CRZ III B is very Unfortunate.</p> <p>To encourage tourism, construction activity should be permitted.</p>	<p>233</p> <p>Akshaya Padnekadapuram</p>	<p>234</p> <p>Amol Saraf.</p> <p>Reconsider Critically Vulnerable Coastal Areas and remove Malvan from the list and consider it under CRZ II Notification 1991 amendment, where the purpose of protecting the critical coastal environment and difficulties faced by local communities can be ensured and faith of common people in democratic processes is strengthened.</p>	<p>235</p> <p>Ashish Jain</p> <p>a. Point 8(ix) – going to MoEF/SEIAA, should not be applicable to existing projects, repairs, reconstruction and maintenance. Point 5.2 (vii) – lots of structures exist. Hence they should not be made EAI and other reports for repairs of the structures. So repair, reconstruction and maintenance of existing floor area should be allowed.</p> <p>b. Jurisdiction of CRZ should end within NDZ. Thereafter normal prevalent rules to apply.</p> <p>c. Beyond NDZ FSI allowed should be as normal areas.</p> <p>d. In NDZ areas Security apparatus to be permitted.</p>
---	--	---	---

		<p>e. Point 5.3 temporary eco friendly cottages should be included</p> <p>f. Height restriction in CRZ should be relaxed to 15 meters.</p> <p>g. vegetative fencing around private property should be allowed without prior approvals.</p> <p>h. Point 2.3.1 CRZ-III A – population limit for crz 3a should be 700 persons. Calangute which is the most densely populated area also won't benefit if this amendment is not brought. If it doesn't affect Calangute it won't affect anyone else.</p>
236	<p>NFF National Fishworkers' Forum Narendra Patil (Chairperson) T Peter (General Secretary)</p>	<p>On behalf of the National Fishworkers' Forum (NFF), objections to the draft CRZ 2018.</p> <p>Reducing the buffer zone besides creeks, will increase risks associated with flooding and changes in creek shorelines.</p> <p>Reduction in NDZ area will reduce the level of protection to coast and increase vulnerability of local populations.</p> <p>Area for special consideration: reasons for dropping Mumbai, Goa and Kerala from this category are unclear.</p>
237	Gmail angad	<p>a. Point 2.3.1 CRZ-III A – Goa being a State with less population the density to be considered as more than 800 per sq kms. Goa being sparsely populated a limit most areas have also had population less than 2161 per sq km.</p> <p>b. Point 5.1.1. CRZ – I A (ii) – after the word “roads on stills” please add words like “bunds, sluices gates, ramps, fishing jetties, etc”.</p> <p>c. Point 5.1.2. (i)(a) word Drydock to be inserted after the word slipway Drydock word need to be inserted as this is also a separate activity requiring Bunding</p> <p>d. Point 5.1.2(XIX) to be added – temporary events like beach wedding, beach sports events should be permitted. (Goa being a tourist place lot of activity happen on the beach which is of temporary nature. The same need to be permitted)</p>

<p>e. Point 5.2 (vii) – repair, reconstruction and maintenance of existing floor area should be allowed.</p> <p>f. Points.3 temporary cottages to be added.</p> <p>g. Height restriction in CRZ to be relaxed to 13 meters.</p> <p>h. Projects once approved by CRZ (state level) or central level should not be challenged. As CRZ rules are anyway very strict and pro environment. This will avoid any NGO's or gram sabhas trying to reverse their decisions.</p> <p>i. There should no need for approval for vegetative fencing around private property.</p> <p>j. Point 5.4 (iii) word shipyard and its associated facilities to be added after word jetties.</p> <p>k. Point 7(vii) – Facilities which require for shore areas like jetties, ramps, slip ways, bunds, sluice gates, shipyards should take CRZ clearance from concerned CZMA. Repair, restoration of existing structures clearance to be taken from CZMA.</p> <p>l. Point 8(i) – after the word “CRZ notification” please add “for new projects only”.a. (it will be too cumbersome procedure for people taking repair and restoration of existing structure. Repair and restoration should be kept out of the procedure stated in point 8.).</p> <p>m.Point 8(ix) – going to MoEF and SEIAA, should not be applicable to existing projects, repairs, reconstruction and maintenance. It should not be applicable also for people building individual houses upto 500 sq m within the framework of CRZ.</p> <p>n. Jurisdiction of Crz should end within NDZ. Thereafter normal prelevant rules to apply.</p> <p>o. Beyond NDZ FSI allowed should be as normal local areas act.</p> <p>p. In NDZ areas Security setup should be permitted. This along with Temporary cottages should be specifically mentioned as a permissible activity in private properties.</p>		
--	--	--

238	Sanjay Fagania Ghelani Builders Surat sanjayfaganiya@yahoo.co.in	As the area falls under already developed municipal limit of Surat city, it is requested to notify as CRZ II area. It is further to request you to superimpose boundaries of T.P. Schemes as well as boundaries of Final plots in the CRZ map. Revenue survey numbers of CRZ affected area should be superimposed on CZMP. Instead of mangroves area, specify the density of mangroves to consider the area as CRZ-1A The open coast setback in any CRZ Zone from HTL shall not be applicable for projects of Tourism, beach resorts, without linking with census.
239	Viresh Borkar	Please find attached the demand to scrap draft CRZ notification 2018. (no attachment)
240	Ankit Jain Rakhee Grover Jain Mumbai	Consider either reducing the required population number per sq. km., or demarcating the NDZ as the area up to 50 mts from HTL in CRZ III areas. All over the world, residential and commercial construction are permitted in beach front properties. At the most there should be restrictions on the height and FSI consumed by such construction. Banning all construction is serving no purpose whatsoever, and is only serving to greatly reduce employment in rural coastal communities.
241	Joseph Sequeira Goa	Draft CRZ Notification 2018 must be scrapped and that the new CRZ laws must completely ban all hotels, industries, big real estate housing projects in the CRZ.
242	Chintak Patel chintak@ew.esselgroup.com RP Tyagi Sr. Vice President Projects Essel Infraprojects Ltd.	The land situated within 500 mtr from HTL of sea, land located on Hill Top having height more than 25 mtr above MSL; need not come within the clutches of this notification. Limit of 5ppt CRZ categorization should be changed at any point of time, with approval by concerned CZMA. Instead, revised CZMPs should be sent to MoEF & CC for the sake of Record only and not for according sanction. In NDZ of CRZ-III A & CRZ - III B, developmental activities that are otherwise permissible in Development Plan should be permitted, specifically activities related to Tourism / Recreation / Amusement. Scope of permissible activities need be expanded & developmental activities that would give impetus to

<p>Tourism should be encouraged.</p> <p>FSI Values as applicable from time to time should be as prescribed in Development Plan should be made applicable, instead of its applicability from the date of Notification.</p> <p>Resorts are permissible subject to prescriptions given in Appendix- III. However, the FSI value be increased to 1.00 without any height restriction.</p> <p>Kharlands as defined in Maharashtra Kharland Development Act 1979, need be given special treatment allowing developmental activities</p> <p>The following rider should be added to this clause: Extent of Buffer Zone may vary and will not be considered as CRZ IA, in substantially developed areas viz urban areas, which have been categorized as CRZ II.</p> <p>The expression "Without change in present land use", need be replaced by "without resorting to hazardous land use"</p> <p>i) After the words "this notification" following shall be added "except for building construction projects / housing schemes / Tourism oriented projects".</p> <p>ii) Similarly, after the words "Disaster Management Plan" following words shall be added "except for building construction projects / housing schemes / Tourism oriented projects"</p> <p>This clause to be extended by adding following "Social impacts and analysis not required for Tourism oriented Projects."</p>	<p>K Roy DIG, Coast Guard Headquarters</p>	<p>243</p>
<p>Tourism should be encouraged.</p> <p>FSI Values as applicable from time to time should be as prescribed in Development Plan should be made applicable, instead of its applicability from the date of Notification.</p> <p>Resorts are permissible subject to prescriptions given in Appendix- III. However, the FSI value be increased to 1.00 without any height restriction.</p> <p>Kharlands as defined in Maharashtra Kharland Development Act 1979, need be given special treatment allowing developmental activities</p> <p>The following rider should be added to this clause: Extent of Buffer Zone may vary and will not be considered as CRZ IA, in substantially developed areas viz urban areas, which have been categorized as CRZ II.</p> <p>The expression "Without change in present land use", need be replaced by "without resorting to hazardous land use"</p> <p>i) After the words "this notification" following shall be added "except for building construction projects / housing schemes / Tourism oriented projects".</p> <p>ii) Similarly, after the words "Disaster Management Plan" following words shall be added "except for building construction projects / housing schemes / Tourism oriented projects"</p> <p>This clause to be extended by adding following "Social impacts and analysis not required for Tourism oriented Projects."</p> <p>Indian Coast Guard Stations and related infrastructure caters to the undertaking of its specific charter of duties at sea involving search and rescue, pollution response and coastal security etc. Such activities require berthing, operations and maintenance of ships, boats, hovercrafts etc. needing foreshore facilities, besides training facilities. In this context, following suggestions are made for changes in the draft CRZ Notification, 2018:</p> <ul style="list-style-type: none"> • "Indian Coast Guard Stations and support infrastructure projects" may also be included in Para 	<p>K Roy DIG, Coast Guard Headquarters</p>	<p>243</p>

		<p>5.1.2 of the draft Notification.</p> <ul style="list-style-type: none"> ● Inclusion of Indian Coast Guard (Hover Ports) in Para 5.1.1 (iii). ● Inclusion of Hover Ports in Para 5.1.2 (i) (a) & (e). ● Inclusion of Indian Coast Guard in Para 5.1.2 (i) (b). ● Inclusion of Hover Ports and Indian Coast Guard Stations in Para 5.1.2 (ii). ● Inclusion of Indian Coast Guard Coastal Security Network (CSN) as approved by the Cabinet Committee on Security in Para 5.1.2 (xi) and (xvi). ● Inclusion of “Construction of Indian Coast Guard, support infrastructure (Commercial Ports)” in Para 5.3 (ii) as a new item (h). ● Hover Ports to be included in Para 5.4 (ii) (a). ● Indian Coast Guard to be included in Para 5.4 (ii) (b). ● Hover Ports and Indian Coast Guard units to be included in Para 5.4 (iii). ● Indian Coast Guard Coastal Security Net Work (CSN) related projects to be included in Para 5.4 (viii). ● Indian Coast Guard Coastal Security Network (CSN) to be included in Para 5.4 (xvii).
244	Office of the Maradu Municipality	Regional Language
245	Kokil Prashant P Tata Power Company Ltd. Mumbai	<p>In para 2.1.1 (a) (i), wherever the property is having compound wall abutting the mangroves or is having access road/DP road very close (within 50 m) to the mangroves, such area shall be exempted from classification as CRZ-IA.</p> <p>In para 5.1.1 (ii), it is mentioned as per earlier CRZ Notification 2011, that in mangroves buffer zone laying of transmission lines is permitted activity. Same should be permitted in entire CRZ-I area including mangrove area and mangrove buffer zone in 2018 notifications.</p> <p>In para 5.1.2 (vi), storage of coal to be included in the list of permitted activity of storage of non-hazardous cargo.</p> <p>In para 5.1.2 (xv), along with transmission lines, other associated activity of laying of electric cable, substation etc. to be included.</p> <p>All activities related to emergency maintenance including restoration / replacement of existing facilities of Transmission Lines/ Tower/ Cables in the CRZ area should be permitted activity and <i>required to be exempted from CRZ clearance.</i></p> <p>For linear projects like transmission line, cable laying separate frame work to be applied for preparation</p>

32
60
9

<p>of EIA and Marine Impact Assessment on case to case basis and not as a general condition.</p> <p>Annexure-I, of draft CRZ Notification 2018 regarding conservations, protection and management framework for ESAs, at para 1.1 mentions that "such mangroves declared by the concerned State Government /UT Administration/ Central Government as forest land under the F(C) Act, 1980 shall attract the provisions of the F(C) Act, 1980 only." <i>This needs to be clarified whether only clearance under FC Act 1980 is sufficient and no separate CRZ clearance is required or otherwise.</i></p> <p>Activity related to conservation or protection or enhancement of ecosystem should be permitted and there should be no requirement of CRZ clearance.</p> <p>In annexure-II, under list of petroleum and chemical products permitted for storage in CRZ, Coal should be included in the list of permitted products.</p>	<p>We object the new proposed changes in norms in CRZ 2018 notification</p>	<p>Sharbel Eijpsy</p>	<p>246</p>	<p>the draft overall is more favorable for construction companies, ports, transport and tourism industry, as opposed to protecting the environment (including but not limited to the sand dunes and delicate flora and fauna along the coast) and safeguarding traditional livelihoods and therefore, must be immediately dropped.</p> <p>Coastal Rights Bill: This must be done via a consultative process with the fishworkers and be undertaken keeping the principles and spirit of the CRZ 1991 notification in mind.</p> <p>CZMPs: The Coastal Zone Management Plans (CZMPs) under the CRZ, 2011 be completed including the demarcation of lines, zones, plans and the long-term housing needs of coastal-fisher communities – in a transparent and accountable way, with community participation and wisdom being incorporated.</p> <p>Past Violations: The CRZ 2011 notification be implemented before Gol comes out with another CRZ notification. This is to ensure that the new draft does not legitimize and regularize past violations</p>	<p>Prasad Raghavan</p> <p>The proposal of Kerala State Fish Workers Federation (AITUC)</p> <p>It will defeat the very purpose of the environmental protection act and the interest of the Fisher folks and the local community.</p> <p>Limiting the CRZ area to 50 meters in the banks of the tidal influenced water bodies is not acceptable. It must be kept as in the 2011 notification.</p> <p>Sub division of CRZ III on the basis of density of population is not scientific and not acceptable.</p>
<p>247</p> <p>Rahul D'silva</p> <p>Objection to the CRZ draft Notification, 2018</p>	<p>248</p> <p>Prasad Raghavan</p> <p>The proposal of Kerala State Fish Workers Federation (AITUC)</p>	<p>246</p>	<p>247</p>	<p>of EIA and Marine Impact Assessment on case to case basis and not as a general condition.</p> <p>Annexure-I, of draft CRZ Notification 2018 regarding conservations, protection and management framework for ESAs, at para 1.1 mentions that "such mangroves declared by the concerned State Government /UT Administration/ Central Government as forest land under the F(C) Act, 1980 shall attract the provisions of the F(C) Act, 1980 only." <i>This needs to be clarified whether only clearance under FC Act 1980 is sufficient and no separate CRZ clearance is required or otherwise.</i></p> <p>Activity related to conservation or protection or enhancement of ecosystem should be permitted and there should be no requirement of CRZ clearance.</p> <p>In annexure-II, under list of petroleum and chemical products permitted for storage in CRZ, Coal should be included in the list of permitted products.</p>	

		<p>The reduction of the NDZ is detrimental to the ecosystem, relaxation in the NDZ should be given only for the Fisher folks and local community for their residential and social needs.</p> <p>A comprehensive CRZ act similar to the Forest Rights act to protect the coastal environment and the rights of the Fisher folks and the local community.</p>
249	VN KK Viswanathan Noida	<p>If the proposed draft CRZ regulations purporting to reduce the 'No development zone' from the existing 100 metre to 50 metres, is implemented across the entire coastline of India.</p> <p>Then the CRZ-II & III will dilute the coastal protection and shall become more hazardous to the local inhabitants, apart from damaging the flora & fauna, and ecology of the area.</p> <p>The draft notification should have been prepared with public consultation and persons residing and working in the coastal areas.</p>
250	Kajal Kamble Ravindra Dattatraya Bhosle Pune	<p>Objection to change the limitation of CRZ to 50 m from HTL. NDZ should be allowed from HTL to 75 m (for Maharashtra State).</p>
251	Thangeswari Agency Society of st. Vincent de Paul, Gandhi Nagar	<p>Give back CVCA (Zone V) rights of gulf of Mannar as per CRZ 2011 in CRZ 2018 to save the coastal inhabitants.</p>
252	Hrushikesh, Swami Samartha Nagar, Apna Ghar Unit No.1 Co-op Housing Society Ltd. Andheri (W), Mumbai - 400 053. Tel- 9122- 26342610.	<p>5.2 (iii) Building permitted shall be subject to the local town and country planning regulations as applicable from time to time and the norms for the FSI or FRA prevailing as on the date of this Notification. Instead development should be as per permissible FSI as applicable from time to time. Reconstruction may be changed to Redevelopment. Open spaces of private layout within MCGM limits shall not be included as NDZ.</p>
253	Dr. B. N Patil Director, Environment MCZMA CELL National Real Estate Development Council & Mumbai Association of	<p>Unless the CZMP are revised/ updated or come in to force and CZMP as per the provisions of the CRZ notifications 2011, shall continue to be followed for appraised and CRZ clearance to such projects.</p> <p>Proposed benefits of this Notification of FSI/FAR which include reduced width of CRZ for creeks from 100 m to 50 m will remain on paper and will not be realized.</p>

	Realtors		
254	Brahmachari Sreevalsan, Public Relations Coordinator, Mata Amritanandamayi Math, Amritapuri PO, Kollam, Kerala. +91 9496007400, +91 8281637797	Request to add the term 'Spits' under clause 10.2 of Draft CRZ Notification 2018 Add the provisions for the repair and maintenance of existing buildings in the draft CRZ notification, 2018 Provision in the draft to include Pilgrims Centres - several temples and pilgrim centres along the coastal belt of India. The draft presently explains about the rules for dwelling units of local communities, tourism related activities, construction of hotels, fisheries, mining, petroleum, infrastructure projects etc. We kindly request the authority to also include pilgrim centres, as the nature of operations of a pilgrim centre is different from that of hotels or resorts.	
255	Pushp Jain EIA resource & Response Centre.	Desalination plants, laying of pipeline/ transmission line, limestone mining and mining of rare earth minerals should not be allowed in CRZ areas. Activities that impact on livelihood of the fisher community should not be permitted in CRZ areas. CRZ Notification, 2018 should retain special consideration for CRZ areas such as Goa and Kerala as in CRZ, 2011 Notification. Hazard line should be made public. HTL must be uniformly demarcated for all parts of the country within set time frame of one year. Retain the 100 m CRZ limits on land along tidal influenced water bodies. NDZ should remain 200. NDZ should be up to 500 m. NDZ should be NDZ for all activities. Identification of mangroves, beaches, corals, nesting areas and other ESA's should not be limited ones identified by NCSCM, this should be broad based exercise involving many more other institutions. Don't open sea bed area for activities. Specificlear term "identified stretches" and "eco-tourism" to avoid commercial activities.	

		<p>In mangrove buffer no activity should be allowed. Minimise activities in inter tidal region.</p> <p>Limestone mining should not be allowed in CRZ III A.</p> <p>CRZ IV area involves fishing communities; thus public consultation should be done.</p>
256	Mahendra Bhatt	<p>If the relaxation of 50 metres from the existing 100 metres from coastline is allowed, as suggested in the proposed regulation, then the CRZ II & III will dilute the coastal protection and shall become more hazardous to the local inhabitants, apart from damaging the flora & fauna, and ecology of the area.</p>
257	Joaquim Pereira	<p>I object to the draft CRZ of Goa coastal areas.</p>
258	<p>United Goans Foundation Registered Society (Goa) Dr. Aashish Kamat</p>	<p>The draft 2018 unacceptable and makes it necessary to prepare a new law based on reason, logic and principles of legislative changes.</p> <p>Mangroves, salt marshes, intertidal area etc. should not be open for strategic, defence, security and etomic energy projects.</p> <p>Draft CRZ 2018 notification is nullifies due to weaknes of setback lines. This reduce CRZ area for tidal Influenced bodies.</p> <p>This draft changes the meaning of CRZ zones and making reclamation of CRZ areas for commercial activities a permissible activity.</p> <p>In draft 2018, setting up and expansion of units or disposal of waste and effuents has been deleted. This draft is permitting even facilities not within the CRZ areas to have treatment facilities for waste and effluents within the CRZ.</p> <p>Groud water extraction become permissible activity through manual wells for agriculture, drinking facilities etc.</p> <p>It favours the tourism over sustainable livelihoods. This notification removed special considerations in some CRZ areas. Special consideration given to Khazan lands ogf Goa need to be strengthened and accelerated destruction of these ecologicaly and socio-economically sensitive area.</p> <p>Decentralizing the clearances procedures will lead to complete collapse in the in the administrarion and implementation of the CRZ notification.</p> <p>Storage of Monoethylene Glycol and Acetic Acid will increase the risk to the ecology & biodiversity of the CRZ areas and it must be dropped.</p> <p>Expansion of fish processing units in CRZ I areas will decrese the open inter-tidal spaces and therefore lees protection towards hazards and hence must be dropped.</p>

	<p>CRZ IIIA and CRZ IIIB classification must be dropped. NDZ for tidal influenced water bodies should not be reduced. CRZ IA and CRZ IB to be totally protected.</p>	<p>Sunil B Shah, DGM (Projects) Ajmera Realty & Infra India Ltd, 2nd Floor, Citi Mall, Andheri (W), Mumbai- 400053 + 1 representation</p>		<p>5.2 (iii) in this clause, it is allowed to develop the plot in CRZ II on landward side of existing road as per the country and town planning regulations from time to time but FAR is restricted on the date of this notification. Suggestion: to allow the FAR applicable from time to time as per TPCR on the day of submission of the proposal. it's good that buffer zone for the creek has been restricted to 50 m</p>		<p>MoEFCC should withdraw the draft notification 2018. The proposal in the draft notification to reduce CRZ from 500m to 20m in islands along mainland coast and backwater islands exposes the coastal community The reduction of No Development Zone (NDZ) from 200 m to 20m by introducing a new category CRZ-III is again exposing the coastal community and property to coastal hazards. Reduced the living space of fisher community in many places along Kerala coast. Reduction of CRZ from 500 to 20m and NDZ from 200 to 50m is as encroachment into the traditional area of activity of fisher community. Draft 2018 notification proposes to categorise mangroves based on whether it is under forest department, public land or in private land. Is now limited to mangroves in public only. Removal of clauses like 'Setting up of waste processing units in the CRZ; Reclamation for commercial activities; and Ground water withdrawal from CRZ from prohibited list of activities raises doubts about the intention of the draft notification. The clearance for all activities with respect to fishery and associated activities and the local community requirements in the entire CRZ should be with the state CZMA. The demarcation of HTL and ESAs in the State should be done with meaningful consultation with the state or should be done by a competent organisation in the State. Traditional / fisher community may be permitted construction/reconstruction of houses in CRZ III up to 100m² for facilitating better houses. Tourist resorts may be permitted landward of 100m along sea coast instead of the present 200m.</p>	<p>260 Kerala Sasthra Sahitya Parishad</p>		<p>Objection of this CRZ notification</p>		<p>261 Elyeen Pereira Dr Francisco Pereira</p>
--	--	---	--	--	--	--	--	--	---	--	--

262	Anu TEJANI	Appreciate the initiative taken by government for CRZ draft notification.
263	Candolim Residents & Consumer Forum Goa	<p>Objection: NDZ should not be decreased from its existing value of 200 mt.</p> <p>Suggestions: Regularization of existing structures that come within the prevailing NDZ of 200 m from HTL should be considered. (with terms and conditions a) structures to be used for domestic residential purpose. b) 20-year domicile compulsory for the applicant. c) Applicable to properties below 2000 sq m. d) structures that already exists as per date and not for new constructions.</p> <p>Transferable Development Rights (TDR) should be granted for those owners who can not develop their properties since they are ruled by the prevailing CRZ rules of NDZ within 200 m of the HTL.</p> <p>Increase of FAR in the 200-500 m zone from existing 33% to at least 70 % FAR.</p> <p>Demoliation of existing resorts and other mega projects that have been constructed in violation of the prevailing CRZ 2011, Notification.</p>
264	Ashraf Dlamondwala Advocate Mumbai	Approve necessary changes in Draft CRZ Notification 2018 to enable successful implementation of all slum Rehabilitation Schemes in coastal areas of Mumbai and thereby achieving governments goal of "Housing for all".
265	Bombay Environmental (BEAG) Action Group Mumbai	<p>CRZ shall apply to the land area between HTL to 50mts100 mts or width of the creek whichever is less on the landward side along the tidal influenced water bodies that are connected to the sea and the distance upto which development along such tidal influenced water bodies is to be regulated shall be governed by the distance upto and demarcated accordingly in the Coastal Zone Management Plans.</p> <p>The EMP shall ensure that core zones and other area which are vulnerable are demarcated as no go zones and all efforts shall be purely for the purposes of protection, restoration and rejuvenation of ecological assets.</p> <p>Mangroves in Government land shall be protected by the concerned State/UT Governments based on a detailed plan to be prepared <i>within a period of 2 years from the state of publication of this notification.</i></p> <p>Mangroves in private land will not require a buffer zone.</p>

<p>Active and live coral and coral reefs identified and delineates shall be declared and notified as ESA under E 9P) Act 1986 within a period of 2 years from the state of publication of this notification.</p> <p>Turtle nesting grounds, horse shoe crabs, sea grass beds and nesting ground of birds should also be protected under the Wildlife (Protection act.) of 1972.</p> <p><i>No Developmental activities shall be permissible in sand dunes area.</i></p>	<p>No developmental activities shall be taken up on the beaches.</p> <p><i>Only on the landward side of such roadnational and state highway in the NDZ, Resorts/ hotels and associated tourism facilities shall be permitted.</i></p>	<p>I object to the plan of the government which is aimed at destroying our coast and displacing the Goans and their livelihood and profiting the rich.</p> <p>The draft CRZ 2018 is full of deregulations and diminutions of Environmental legislation, without any regard to the principle of Non-Regression.</p> <p>The draft CRZ 2018 must be discarded.</p>	<p>267</p> <p>Judith Almeida Colva Civic and Consumer Forum, Goa</p>	<p>268</p> <p>VN vn@radnik.net Jaya Gauri Upadhayaya</p>	<p>269</p> <p>Paryavaran Mitra (Centre) for Social Justice) Mahesh Pandya Paryavaran Mitra 502, Raj Avenue, Bhalkakamagar Road Thaltej, Ahmedabad - 380059</p> <p>Discussed a draft CRZ notification 2018 on 11th June 2018 in Ahmedabad.</p> <p>A total of 30 participants were present which included fisherfolks, representative of various organizations, and concerned individuals.</p> <p>Therefore, we reject the draft of the CRZ Notification of 2018, as it is in blatant violation of "all such measures that it deems to be necessary or expedient for the purpose of protecting and improving the quality of the environment and preventing, controlling and abating environmental pollution" which its parent legislation, the Environment Protection Act, 1986 espouses.</p> <p>No activities should be permitted in CRZ I A Buffer zone limit around mangroves should be 500 m & compensatory afforestation of mangroves should not be permitted owing to risk of loss of biodiversity</p>
--	--	---	--	--	--

		No treatment storage and disposal facilities should be established within 5 kms of CRZ area. Take cognizance of the role of Gram Sabha and Gram Panchayat in case of CRZ III areas, and town planning authorities in urban areas for CRZ II areas should be taken.
270	Anand SK	Kalakkodu is a small village in Poothakulam Grampanchayat of Kollam district, Kerala having 4 wards. It is surrounded by Edava-Nadayara lake and Paravur Lake. Other coastal wards in this Panchayat include Idayadi and Nelletil. A majority of villagers depend on agriculture, fisheries and small scale coir industry for their day to day living. The CRZ rule has become a threat to the inhabitants of this village to buy or sell a plot, to build a house or to reconstruct old buildings in the coastal region. The village which is included in KCZMA Category III is situated 1 to 30 meters above sea level. There has been no report of low tide, high tide or any other natural calamities. However, in Paravur Municipality which is included in Category II construction works are going on progress.
271	Custodio Dsouza	Reject the draft CRZ notification 2018.
272	Ajmera Pragati	Artificial private owned lands where salt is manufactured through artificial means shall not be considered as CRZ. In CRZ categories reservations pertaining to play ground Garden which don't harm the environment be allowed. In categories of CRZ II and CRZ III temporary permissions with yearly renewal condition is allowed. As the demarcation of CRZ area in the instant case is due to the artificial salt pan which doesn't comes under any of the natural coastal processes, thus the same shall be deleted.
273	Maggie Silveira Bharat Mukti Morccha Goa	This will be a mass uprising in case these draft coastal regulation notification 2018 are finalized and enforced in Goa. The draft is anti-nature, anti-people, anti-environment and only for short-term profit of private companies and industries owing to reduction in the NDZ, dropping of hazard line, removal of restrictions and other dilutions in the CRZ. CRZ Notification should increase protection of traditional fishing communities. Hotels, Resorts, Real Estates, Industries, STPs etc. must be completely banned in CRZ. CRZ policy should have provisions for strict punitive measures for officials and party involved in permissions
274	Subodh Krishn A Tari	5.2 (ii) CRZ II & 10.3 (iii) CRZ areas falling within Municipal limits of Greater Mumbai

280	Justiniano Da Costa	<p>There should be no distinction between CRZ-III A and III-B areas for Goa. All the CRZ-III areas to</p>
279	Sanjay Chemicals	<p>Other liquid products which are similar in nature to the products mentioned in Annexure II and other products which are similar or less hazardous compared to products mentioned under Annexure II should be allowed to be handled through the Port Jetties and pipelines should be allowed to be handled by these storage terminals located in Port land and connected to such jetty.</p>
278	Adv. V.R. Ramachandran	<p>New products i.e. Acetic Acid and Mono Ethylene Glycol have been added in the list of products permitted in CRZ areas as per Annexure II.</p>
277	Iona Yvette Fernandes	<p>Two categories to be created under CRZ-III B i.e., one with population density of more than 1100 per square kilometre with an NDZ of 100 meter and the other with a NDZ of 200 meter.</p>
276	Kevin Silveira	<p>District roads to be also included under Clause 5.3 II (f) against provisions for State-National highways in the CRZ-II areas.</p>
275	Sudhir D. Polkar +1	<p>No mining should be promoted.</p>
274	Iona Yvette Fernandes	<p>Any construction on beaches, No Development Zone and CRZ-I should be completely prohibited.</p>
273	Kevin Silveira	<p>Land reclamation should be totally prohibited.</p>
272	Kevin Silveira	<p>Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours.</p>
271	Kevin Silveira	<p>planning tool.</p>
270	Kevin Silveira	<p>Draft Notification is more of industrialisation and urbanisation plan and not environment oriented CZMPs should have been framed earlier to the revision of the 2011 Notification.</p>
269	Kevin Silveira	<p>Don't reduce the NDZ zone to 50mts.</p>
268	Kevin Silveira	<p>Consider entire area where the land area up to 50 mts from HTL shall be earmarked as NDZ in CRZ III areas.</p>
267	Kevin Silveira	<p>land to be allowed for development for the purpose it is allotted / sold by Govt.</p>
266	Kevin Silveira	<p>Centre Nagpur but subsequently there is a spread of mangroves on such land from adjoining land, such</p>
265	Kevin Silveira	<p>If land had no mangroves as per plan of 2005 prepared by Maharashtra Remote Sensing Application</p>
264	Kevin Silveira	<p>10.3 (V) CRZ areas falling within Municipal limits of Greater Mumbai</p>
263	Kevin Silveira	<p>potential of such plot be allowed to be utilised by amalgamation of such plot with adjoining plot.</p>
262	Kevin Silveira	<p>If such plot allotted by Govt. is affected by Buffer Zone of 50 mts. in case of Creek land the F.S.I. by local authority on Govt. land and where such land is already sold/allotted for construction by Govt.</p>
261	Kevin Silveira	<p>The buildings to be permitted also towards landward side of proposed road of already sanctioned layout</p>
260	Kevin Silveira	<p>Envirodesigners Pvt. Ltd. Mumbai</p>

		<p>have NDZ of 50 meters.</p> <p>Repairs to existing structures and reconstruction along with change in land use to be permitted in CRZ-I B.</p> <p>Change in land use to be permitted under Clause 5.2 CRZ-III (iv).</p> <p>Land scaping and swimming pool to be included in the permissible activities in NDZ without considering FAR.</p> <p>Maximum height of construction in CRZ III to be increased to 12 meters to provide 3 meter for accessing the roof to maintain services and equipments for Hotel projects.</p> <p>No time limit prescribed for concerned authorities to approve/update CZMP to the new Notification.</p>
281	<p>Word Travel & Tourism Council, India Initiative (WTTCII)</p> <p>Gurgoan, Haryana</p>	<p>It is welcome move that the NDZ for CRZ IIIA.</p> <p>CRZ IIIB Ares that as per 2011 census were less populated but where majority of hotels currently exist, the NDZ remains at 200 meters, this to be reduced from 200 meters to 100 meters</p> <p>The height restriction be increased from 9 meters to 12 meters.</p> <p>Allow construction of Ground +2 Floors</p> <p>Increase the Far from 0.33% to 0.5%:</p> <p>Increase the Ground Coverage from existing 0.33% to 50%</p> <p>CRZ-II however construction of temporary road using interlocking paver blocks will be allowed for tourist and essential services.</p> <p>CRZ-II the construction of road shall be allowed for beach resorts/ hotels for provision of services to tourist and maintenance of essential services.</p>
282	Ravi Jha	<p>The new draft notification of CRZ should not be scrapped as it will help the costal people to retain their houses and construct houses in their property existing above 50 mtrs. HTL.</p> <p>In the coastal area will have a good living and will be able to develop their own properties and extend their houses.</p> <p>At least one storey building should be allowed to build a one storied building, must be allow for small for tourists houses and the local can earn their living.</p> <p>CRZ regulations should be changed to accommodate to the coastal peoples needs, even mundkars living, along the coastal belt and river coastal line will get advantage of the new CRZ 2018 line of 50 mts. HTL.</p>
283	<p>Students' Sea turtle Conservation Network</p>	<p>The HTL has been demarcated in a unilateral manner without proper consultations.</p> <p>The Notification lifts all prohibitions and regulations based on hazard line, thus opening up the hazard sensitive areas for all types of construction and infrastructure development.</p> <p>Reduction of NDZ to 50 meter and thereby increasing built up spaces so close to the sea shall greatly</p>

344

		harm the nesting patterns of sea turtles. No scientific study on the carrying capacity of coastal areas to accommodate such increased developments CZMP's yet to be approved.
284	Francis Dianish Odipattil Sebastian, JOHN K P Kerala, India Mob: +91 9447 726 881	Traditional inhabitants may be permitted to construct their own houses without any special permission from the Government.
285	Sabuj mancha Naba Dutta Secretary, Sabuj Mancha	Issue of a new Draft without complying with the NGT order for finalisation of CZMP to CRZ, 2011 is the violation of legal procedure. Reduction in CRZ along tidal influenced water bodies will mean no bar on human invasion will be effective. Withdrawal of hazard line land not acceptable in the context of climate change. Unscrupulous tourism will flourish on allowing eco-tourism activities such as mangrove walks, tree hoods and nature trails etc. No special effort taken to consult the coastal communities and traditional favours while preparing the draft Notification. A comprehensive Coastal Regulation Zone Act should be enacted
286	Prakash L. Hirnanandani	Clearances for ports/jetties should be extended to the storage tanks/terminals and pipelines as the ports and ships can be utilised efficiently only after storage tanks/terminals are permitted to handle the products with the boards/jetties are permitted to
287	Atreya sawant	Under clause 5.1.2 (iv) including the barges along the ships/ boards terminals and refineries for transfer of hazardous substances
288	Panchayat Vadakkekara Gramapanchayath Kerala	CRZ shall apply to the land area limited near the sea and river banks The rural areas in Kerala state are thickly populated. Hence rural areas shall be included in CRZ II.
289	Sharad Hegde	CRZ in Creek should apply to limited land area near to the sea and river banks. Thickly populated areas in Kerala to be included in CRZ-II. Manual mining has been omitted as a permissible activity in CRZ-IV areas under clause 5.4. This provision exists in the CRZ Notification, 2011. The omission makes OAMDR Act, 2002 redundant.
290	Umesh Patti	Satellite survey of HTL has not been carried out. HTL should be maintained upto the saline land dam. Mangroves have wrongfully grown in poor farmers' fields because of fault of municipality. Permission

		<p>should be given to clear such mangroves.</p> <p>The Small landlords with limited land and big families request for the FSI to be increased from 0.33 to 0.55 in CRZ III.</p>
291	Mas patel Himmat Kukadiya	<p>We greatly appreciate the initiation of Resolving various CRZ issues taken by the Central Government.</p> <p>Only 1 km Backwater intrusion should be considered for CRZ rules and provisioning</p> <p>General development control regulations (GDCR) stipulates development rules on the river to 30mts from the river where there is no bund retaining wall and only 15 mts where there is wall or retaining bund. We would like to request this GDCR be reflected in the notification and be taken into account. This will help maintain the current ecology and accelerate growth in the city.</p>
292	Nanuthambi M. B. Advocate	<p>NDZ should be uniform for all CRZ areas and fixed as per prevailing conditions in advanced countries like Japan, Singapore.</p> <p>The committee should have invited experts for fixing the NDZ.</p>
293	Secretary Edavanakad Grama Panchayath	<p>Activities should not be allowed in the name of tourism, which encroach upon the spaces of the coast where fishermen keep their boards, nets and other implements.</p> <p>NDZ should be reduced to 10 meter or width of creek along the tidal influenced bodies.</p> <p>Traditional communities to be permitted house up to 300 sqm within 10 mts of HTL in backwater islands.</p>
294	Dr. Sejal Worah, Programme Director WWF India, 172-B Lodi Estate New Delhi 110003, India	<p>HTL definition does not take into account changing tide levels and sea level fluctuations.</p> <p>Hazard prone area will be open to development as not falling in the CRZ.</p> <p>Reduction in CRZ from 100 meter to 50 meter for creeks will have serious impact on ecology.</p> <p>Width of creek is confusing – average width/width at high tide/width at low tide.</p> <p>Mangroves less than 1000 Sq. Km. are also having buffer.</p> <p>Basis of population density of 2161 is not clear</p> <p>Reduction in NDZ from 200 meter to 50 meter in CRZ-III A will affect local communities.</p> <p>No construction should be permitted in the mangrove buffer.</p> <p>Carrying capacity of the inter-tidal area to be specified for manual mining activity.</p> <p>Beach Resort/Hotel should not be allowed in pristine rural CRZ-III areas.</p> <p>Temporary tourism facilities need not be defined clearly.</p> <p>No activities should be permitted in the NDZ including Hotels/Resorts etc.</p> <p>Period of revision of CZMP to be reduced to three years.</p> <p>Validity of clearance to seven years will lead to project demarcating areas for construction at a later stage, resulting into local communities losing livelihood.</p>

		CRZ for Islands be selected based on the size of the Islands and level of inhabitants. Reduction of CRZ limit to 20 meter will put pressure on Islands. The CRZ of at least 50 meter to be maintained.
295	Ashtosh Foundation Trust	Gujarati
296	Suresh Mehta	Gujarati
297	Dhiraj parab	Because of Global warming and Climate change, CRZ limit should be 1000 meter from sea shore. Similarly, CRZ limit in relation to creeks is also to be kept around 300-400 meter and not reduced as it will adversely affect biodiversity. Buffer zone for mangroves should be 100 meter considering land construction Mafia. Permitting roads in CRZ-I A would lead to mass destruction of mangroves.
298	AMOL G RACKVI	Because of Global warming and Climate change, CRZ limit should be 1000 meter from sea shore. Similarly, CRZ limit in relation to creeks is also to be kept around 300-400 meter and not reduced as it will adversely affect biodiversity. Buffer zone for mangroves should be 100 meter considering land construction Mafia. Permitting roads in CRZ-I A would lead to mass destruction of mangroves.
299	Nitin Chitaliya	Suggestion Objection for Draft CRZ 2018
300	Haribhai Lakhotra	Gujarati
301	Abhinav Chandla	Temporary structures to be specifically defined. CRZ-III areas with population density of more than 1000 per sq.m. to be classified as 3-A. Temporary facilities for conducting food festival, beach sports, beach wedding music festivals etc. for promotion of tourism should be permitted subject to tourism plan featuring in the approved CZMP. Tourism facilities along the creeks for promotion of water sports and nature walk etc. to be permitted.
302	Patel Cyber	Gujarati
303	Prajna paramita Panda	Reduction of CRZ in creek area to 50 meter should not be permitted. Development must integrate coastal and marine conservation. Saltpans, rocky structures/out crops and sandy beaches to be included in CRZ-I. Reduction of NDZ in CRZ-IV to 50 meter must be avoided as it enhances risks of lives and exposure to cyclone etc. Infrastructure should not be permitted in ecologically sensitive areas, particularly mangroves. Wind mill in inter-tidal areas can have serious impacts on migratory birds and sea turtles. Inter-tidal area should not be opened for infrastructure development. Temporary tourism facilities to be permitted beyond NDZ.

		No monuments should be permitted within CRZ.
304	Sagar Khanolkar	Products permitted through jetties and pipelines may also be permitted only by tanks in the port areas. Products similar in nature may be added to Annexure-II.
305	Meghana Binraj MSc. Conservation Futures Transdisciplinary University	Mangrove areas even below 1000 sq. m. need a buffer zone. Eco-tourism activities should have also strict regulations for CRZ-I areas. Land for compensatory plantation of mangroves must be identified and secured prior to any diversion. There should be guidelines for identifying types of species selected for plantation. Opening up of NDZ in CRZ-III for Resort/Hotel will impact ecology and roads/livelihood of traditional communities. No monuments should be permitted in CRZ-IV A. Temporary structures to be defined (infrastructure, materials and time period). Amongst documents for clearance, Social Impact Assessment (SIA) must be made mandatory.
306	Ayan Barman, Ahmedabad	Bitumen to be added to the list in Annexure-II.
307	Vinay Chopade + 1 representation Aegis Gas (LPG) Pvt. Ltd.	Storage tank farms may also be permitted along with the pipelines in the CRZ.
308	Abhijit More + 1 representation Sea Lard Containers Limited Mumbai	Storage tank farms may also be permitted along with the pipelines in the CRZ.
309	Stanley Rodrigues Our Rivers Our Rights Goa	The CRZ draft fails to respond to the needs of the coastal society and protect the commons. Provisions in the National Water Ways Act, 2016 for capital dredging, storage of cargo in CRZ transportation, displacement to fishermen folks etc. defeat the purpose of CRZ laws
310	Secretary Edavanakad Grama Panchayath	Language
311	Olencio Simoes	Traditional fishermen unanimously reject the draft CRZ Notification as it does not safeguard the coastline. Over saturated tourism has damaged the coastline and there is heavy erosion because of unplanned ports and harbours.
312	Olencio Simoes National fish workers forum	CZMPs should have been framed earlier to the revision of the 2011 Notification. Draft Notification is more of industrialisation and urbanisation plan and not environment oriented planning tool. Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and

		<p>biodiversity, endangers sustainable favours. Land reclamation should be totally prohibited. Any construction on beaches, No Development Zone and CRZ-I should be completely prohibited. No mining should be promoted.</p>
313	Pamela Rodrigues + 115 representations Goa	<p>CZMPs should have been framed earlier to the revision of the 2011 Notification. Draft Notification is more of industrialisation and urbanisation plan and not environment oriented planning tool. Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours. Reclamation should be totally prohibited. Any construction of beaches, No Development Zone and CRZ-I should be completely prohibited. No mining should be promoted.</p>
314	Telson Thomas	<p>Residential purposes area should be increased to 500 sq.ft. for dispensing the requirements of clearance by CZMA.</p>
315	SISEM India	<p>Dr. Shailesh Naik Committee did not have consultations with primary stakeholders, particularly fisher and coastal communities. Draft Notification may trigger uncontrolled encroachment of sectors like tourism, real estate, ports and industries leading to forced migration of traditional communities from their habitats. Decreasing NDZ is against the cardinal principle in the earlier CRZ Notifications. Reconstruction of houses by traditional/fisher community in CRZ-III – limit of 100 sq. mt. may be increased to 150 sq.mt.</p>
316	Thomas KV	(Same as 500)
317	Claude Alvares The Goa Foundation	<p>Reductions in NDZ to 50 meter will open doors for destruction of coastal stretches. It dilutes the provisions of earlier Notifications. The CRZ-III should not be further sub-divided. Dr. Shailesh Naik Committee Reports and consultations with stakeholders are not available on website.</p>
318	Rajat Bakre + 2 representations	<p>CZMPs should have been framed earlier to the revision of the 2011 Notification. Draft Notification is more of industrialisation and urbanisation plan and not environment oriented planning tool. Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours. Land reclamation should be totally prohibited.</p>

		Any construction on beaches, No Development Zone and CRZ-I should be completely prohibited. No mining should be promoted.
319	Chandramohan KC	Objection
320	School of Industrial fisheries Cochin University of Science & Technology Cochin, Kerala	Decreasing the NDZ is against the cardinal principle of earlier CRZ Notifications and may trigger displacement and migration of traditional communities. Construction of Resort and Hotels on coastal highways without NDZ will adversely affect the sensitive eco-system. Mangrove buffer zone should be provided everywhere. Inter-tidal zone should be fully protected and no activities should be permitted.
321	Casey Fernandes H.no 331, Pandavaddo, Chorao. Tiswadi. GOA 403102.	Reduction of coastal buffer zone to 50 meter and 20 meter seems to be for quick economy games and will impact environment adversely. No activity should be permitted in ecologically sensitive areas. No memorials should be permitted in CRZ-IV. Permitting local authorities to give clearance for self-dwelling units upto 300 sq. mt area will lead to rampant destruction of coasts. CRZ for backwater islands and islands along the main land case should not be reduced to 20 meter.
322	Ilma Dias	The new CRZ laws will dilute the environment protection and only increase industrialisation and concretisation of the coast. CRZ laws must completely ban Hotel/Resorts/Industries and Real Estate etc.
323	Eric Printo	Reduction in NDZ to 50 meter is asking for more loss of lives and destruction by natural disasters.
324	Manoj Patil Manojpatil2663@gmail.com	Marathi
325	Devika Saigal Mandwa Port LLP Mumbai	Marina for Ports and Yachts to be included as a permissible activity in CRZ-I B. Shore size amenities like harbour offices, custom and immigration posts, fuelling stations, F&B for crew and visitors, accommodation for crew, water sports and recreational facilities may be permitted.
326	Mahesh Javkar	Entire Malvan area has been listed as CVCA and development within the municipal council has totally stopped. Regulations for CVCA must be made clear.
327	Marianne Manuel Secretariat National Coastal Protection Campaign Pondicherry	Weakens coastal protection and threatens livelihood of coastal communities. Draft is more of a development law than Environment Protection Law. Dr. S. N. Committee did not consult public stakeholders. Draft should have been issued only after finalisation of CZMPs. CZMPs do not reflect hazard line.

328	A. Gopalakrishnan, Director Central Marine Fisheries Research Institute [CMFRI] - ICAR - Govt of India], Near High Court of Kerala, P.B.No.1603, Ernakulam North, P.O., Kochi-682 018, Kerala, India.	CRZ in creek area based on salinity is abstract. CRZ-III A areas should consider the population in land area excluding the water spread (traditional shrimp ponds/earthen ponds spread between the land areas). Eco-system dependent aqua culture like mud crab farming may be permitted in mangroves. No construction should be permitted in CRZ-I. Permissioin may also be granted to Mariculture following the rules of Coastal Aqua Culture Authority (CACCA), fish landing centres, bivalve farms, seaweed farms and floating cages. Bunding should not be allowed as they restrict water flow and create dead zones. Traditional fishing permitted in CRZ-IV to be replaced by fishing activities under Marine Fisheries Regulation Act of respective States. Mari culture to be also permitted. For back water Islands and Islands along with the main land coast, new construction may also be permitted within 20 meter of the HTL.	329	Achal S Agarwal Jaywant Industrial Premises Co-operative Society Ltd., Haji Ali, Mumbai - 400034. India. + 1 representation	In Clause 5.2, there should be no restriction on the change in land use while permitting restriction of authorised buildings. For demarcating the water areas of CRZ-IV under the CZMP, creation for water bodies provided under the "UNCLoS" should be applied in addition to NHO data.	330	Bharat Raval - President ISMA + 1 representation Gujarat. No clear cut guidelines for biologically mud flats. Biologically mud flats should obstruct upto 10 meter from the HTL. Mud flats are extensively used for salt production for entire country.	331	Mariamamma Nagar SRA Sehkaari Grahitrman Maryadit Varli, Mumbai + 82 Representations	Development related relaxation to be implemented immediately with site specific NOC being obtained from the Maharashtra CZMA, without waiting for finalisation of CZMPs. In Clause 5.2 II "various fixed structures" may be replaced by "structures protected by any State Laws/Policy" to also cover cessed buildings, slums and other protected structures. Clause 5.2 II, the FSI should not be frozen on the date of this Notification and may be permitted as applicable from time to time.	332	Swapnil Rajpurkar JP Infra Skylark Realtors Pvt.Ltd Mumbai	Saltpans were not naturally formed and were mostly created artificially for salt harvesting. With stoppage of such activities, the land is left barren. Such land, however, is to be dealt with CRZ-I B, as per the Notification. It is suggested to taken such land out of the purview of the CRZ-I B for utilising precious land for development.
-----	--	---	-----	---	---	-----	--	-----	--	---	-----	---	--

333	Diana Tavares (Goa) (Nurse & Yoga Instructor)	The draft is anti-nature, anti-people, anti-environment and only for short-term profit of private companies and industries owing to reduction in the NDZ, dropping of hazard line, removal of restrictions and other dilutions in the CRZ. CRZ Notification should increase protection of traditional fishing communities. Hotels, Resorts, Real Estates, Industries, STPs etc. must be completely banned in CRZ. CRZ policy should have provisions for strict punitive measures for officials and party involved in permissions for violations of CRZ Notification, 2011.
334	Ilarish Vasudevan	In Para 2.2.1.a (iv), biologically active "mud flats" should be replaced by mud flats. In Para 4 (ix) "active sand dunes" to be replaced by sand dunes. Temporary tourism facilities should be permitted only for limited period. Memorials within CRZ-IV should not be permitted. STPs in CRZ-I B should not be permitted. Tree huts should not be permitted in mangroves. NDZ should not be diluted.
335	AVI Malvankar Vasudev Bhaskar Malvankar Sindhudurg	Entire Malvan should not be considered as CVCA and should be included in CRZ-II, as per norms. Only identified areas should be protected and stipulated in the NDZ and Green Zone. Permissible activities in various categories should also be permissible in CVCA.
336	Dr. Vijaykumar Ramanlal Patel	Notification lacks transparency and equality in terms of data collected/prepared by NCSCM and other agencies. No provision to curb illegal activities by changing the nature of land use.
337	Ashish Desai Project Coordinator Nirma Ltd. Ahmedabad Phone: 079 27549319 Mobile : 9825320090	Finalisation of new draft should be after finalisation of CZMP, as per CRZ, 2011. CRZ boundaries of 500 meter from HTL should be reduced and States should be allowed to decide on planning development and balancing with sustainability of coastal eco-system. As salt harvesting has no impact on coastal ecology, there should be no requirement for CRZ clearance under the Notification. All CRZ-III areas should have a NDZ of 50 meter.
338	Jean Alvares	NDZ should not be decreased from existing 200 meter as it will put human lives to danger. Development within 50 meter of HTL in the NDZ will lead to destruction of vegetation and sand dunes. Reduced NDZ will lead to loss space for fishermen for their boats, nets etc. Reduced NDZ will lead to the shore or beach area being eaten away and will discourage tourists who cherish the beach and not the sea alone. Existing structures within NDZ of 200 meter from HTL should be regularised.

		Transferable developmental rights should be granted to owners of land in the NDZ, who cannot develop their properties, being in the NDZ of CRZ III. FSI in CRZ-III areas may be increased from 33 per cent to 70 per cent.
339	Tanvi Godambe, Ph. D Assistant Manager (Liaisoning)	Suggestion/ Comments on Draft Coastal Regulations Zone Notification 2018 in regards to the Salt Pans considered under CRZ 1B reservation Copy of previous
340	Anant N. Malvankar Sindhudurg	Entire Malvan should not be considered as CVCA and should be included in CRZ-II, as per norms. Only identified areas should be protected and stipulated in the NDZ and Green Zone. Permissible activities in various categories should also be permissible in CVCA.
341	Naveen Nambouhri, Ph.D. Director Dakshin Foundation, Bangalore 560 092 Phone: +91-80-42113509	The process for framing the draft notification is non-participatory. Critical hazard line base approach has been removed. It will lead to indiscriminate and unsustainable exploitation of the coasts. Ecologically important inter-tidal zones will be opened to destruction and polluting activities. Notification permits commercial tourism and development activities without preferential use of traditional and small scale fisheries.
342	Narmata Tanna	All CRZ-III areas should have uniform NDZ of 50 meter. Coastal areas are prime real estate. These can be used to develop tourism and leveraging message skilled and unskilled force in these areas. Massive engineering projects like in Dubai can be built for eco-tourism experience.
343	Vinay Khandelwal	Mumbai is a substantially built up city. CRZ should be restricted only to seaward side of road and landward side should be excluded from CRZ. Entire CRZ-III area should have a NDZ of 50 meter. Clause 5.2 for CRZ-III areas should have a provision for change of land use as per local town and country planning rules.
344	Sri Iajarus Institute for Environmental research and Social Education Tamil Nadu	Notification will not protect the flora and fauna and coastal environment of the Kanyakumari coast.
345	Raveendran pk	Good effort. Include entire Kerala Sea-shore in CRZ-II. Exclude land patches, which are 3 meter above the sea level from the CRZ.
346	Deven Dholam	Entire Malvan should not be considered as CVCA and should be included in CRZ-II, as per norms.

		Only identified areas should be protected and stipulated in the NDZ and Green Zone. Permissible activities in various categories should also be permissible in CVCA.
347	Fredrick Rodrigues Fr. Agnel College, pilar Goa	Reducing NDZ to 50 meter will only give opportunity to builders to build the concrete structures near water bodies. This will destroy the beautiful nature.
348	Rishi Gupta	Draft is anti-environmental for coastal region.
349	Pallippuram GP EKM P.K Radhakrishan Pallipuram Grama Panchayat	Fisher/traditional community should be permitted to construct houses/toilets/stores for fishery related materials in NDZ of CRZ-III. The limit of 100 Sq. Mt. for houses for traditional/fisher community may be increased to 150 Sq. Mt. Traditional communities may be permitted to construct houses landward of 20 meter of HTL in barrier beaches/barrier Islands/Spits.
350	Suraj Naik	The draft is anti-industry, anti-people and anti-development. It is for benefit of private companies and industries rather than protection of coasts. Removal of hazard line and reduction in NDZ and other dilutions will not help environment. New draft should increase protection to traditional fishing communities. Notification must increase protection to all regulatory zones and should reduce activities permitted in them. All provisions permitting Hotels, Resorts, Real Estate, Industries, Ports, Power plants should be removed from the CRZ completely. Strict punitive measures for violations should be in place. Sand dunes, agricultural lands, low lands and water bodies to be restored in the CRZ.
351	Sharadha p.p Address in Regional Language	Some backwater stretches in Kerala have tidal line width of 50 meter are not suitable for any construction work. Backwater stretches should be taken out of the purview of the CRZ. Tourism alone can change the standard of living of public and economy of this area, and, therefore, construction works should be permitted.
352	Athira VG	There are many areas in Kerala where little land is available along the river side. Reconstruction of houses within 50 meter in such areas should be reduced to 10 meter.
353	Shaju890@gmail.com Center for fisheries Studies Kerala + 3 representations	The draft favours tourism, corporate and industries. HTL prepared by NCSCM is unclear and inaccurate. No construction should be permitted in CRZ-I. 5 PPT limit for CRZ in tidal bodies is unscientific. Proposed constructions on coastal roads and highways in the NDZ should be banned.

354	Suraj Naik	<p>Basis for population density in CRZ-III areas is unscientific. Richly populated areas could be excluded from NDZ. Mining should be forbidden at sea and sea coasts. Eco-tourism should not be permitted in mangrove areas. No tourism activity should be permitted within 50 meter of HTL. Preparation of CZMPs should involve expert fishermen. Only defence related projects should be permitted in CRZ-I and NDZ.</p> <p>Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.</p>	355	Mohit Lugani	<p>Local bodies should be empowered for promoting repairs, renovation and reconstruction of authorised structures. The CRZ demarcation in creeks tidal influenced water bodies should not be linked to finalisation of the CZMPs. Village Panchayats, which have adequate infrastructure like sewage networks, roads etc., to be included in CRZ-III. The population density criteria should be reduced to 1000 per sq. mt. for CRZ-III A areas. Repairs of existing Hotels/Resorts within NDZ areas may be permitted. Temporary structures like shacks, temporary wooden cottages, modular swimming pools, beach wedding facilities, play areas and horticulture etc. should be permitted within the NDZ, abutting the proposed new hotels beyond the NDZ.</p>
356	Sebastian Rodrigues	<p>The draft is anti-nature, anti-people, anti-environment and only for short-term profit of private companies and industries owing to reduction in the NDZ, dropping of hazard line, removal of restrictions and other dilutions in the CRZ. CRZ Notification should increase protection of traditional fishing communities. Hotels, Resorts, Real Estates, Industries, STPs etc. must be completely banned in CRZ. CRZ policy should have provisions for strict punitive measures for officials and party involved in</p>	356	Sebastian Rodrigues	

		permissions for violations of CRZ Notification, 2011.
357	Rajesh P N Transportation Planner	Temporary shacks permitted on the seaward side of national and State highways is not advisable in the No Development Zone. Period of expiry of temporary shacks has also not been mentioned. All Gram Panchayats falling in the CRZ-III B category should be treated in CRZ-III A. It is suggested that all rural areas of Kerala to be under CRZ-III A for uniformity amongst various Gram Panchayats. Responsibility of ensuring solid waste management and storage disposal should be given to the concerned Pollution Control Board.
358	Beenamn	Thickly populated coastal towns, which are not ecologically sensitive areas, should be treated as CRZ-II.
359	Shailaja Patil & Mahendra Paradkar Malvan	Instead of entire Malvan being declared as CVCA, only key identified areas should be treated as CVCA. Restriction and activities permissible in the CVCA should be mentioned clearly. CVCA to be demarcated separately using different legend in CZMP. Draft should also have been published in Hindi.
360	Sanjay Gupte General Manager -Terminal Gujarat Chemical Port Terminal Company Limited- Dahej	<ul style="list-style-type: none"> • CRZ limit for existing industrial areas, industrial estates and notified port areas should be reduced from the present 500 meter to 200 meter to encourage port based industrial development and effective land utilisation. • In definition of CRZ-II areas, “built up” should be replaced with “developed”. • CRZ-III A and III-B are defined on population density. Actual population also includes migrants, which do not get reflected in Census Data. • As per the Notification, NDZ will not apply in areas falling within notified port limits. Existing industrial estates/investment regions declared by Government should also be included from the NDZ. • Annexure-II should also include following chemicals: <ul style="list-style-type: none"> ○ Paraxylene ○ Ethane ○ Butadine ○ Methanol ○ Caustic ○ Other petroleum/petrochemical products not specified in this list ○ Warehousing • Sea water for cooling tower, purification by desalination/RO etc. should also be included in Clause 5.1.2 (xiv). <p>Jetty backup/support facilities and storage/warehousing may be included in Clause 5.4 (iii).</p>

361	Mathews eastend	<p>NDZ for all tourism destinations notified by the State Governments may be reduced to 50 meter as getting land in populated areas is very difficult and construction of a beach resort would need at least 3 to 4 acres, if NDZ is to be considered as 200 meter.</p>		KDP Mistry	362
362	Secretary HAMA	<ul style="list-style-type: none"> • CRZ boundary of 500 meter to be reduced to 200 meter for notified industrial areas/estates. • Limit of 50 meter in creeks to be reduced to 25 meter for notified industrial areas/estates. • No clarity for applicability of CRZ-IV A and B, i.e., only for sea front or tidal influenced water bodies or both. • A uniform NDZ of 50 meter is suggested for all CRZ-III areas. • Under clause 5.1.2 (iv) include 'Barges' along with the ships/ ports terminals and refineries for transfer of hazardous substances. • Products permitted through jetties and pipelines may also be permitted only by tanks in the port areas. • Products similar in nature may be added to Annexure-II. 	<ul style="list-style-type: none"> ○ Paraxylene ○ Ethane ○ Butadiene ○ Methanol ○ Caustic ○ Other petroleum/petrochemical products not specified in this list ○ Warehousing 	<p>Sea water for cooling tower, purification by desalination/RO etc. should also be included in Clause 5.1.2 (xiv).</p>	363
364	THAD NIKHI	<p>The Notification goes against the very objectives of CRZ. IITL prepared by NCSCM is unclear and inaccurate. No construction should be allowed in coastal belt. Draft does not speak about plan for the security of sea and the coastal belt. 5 PPT limit is unscientific. Ban on constructions on coastal roads and highways in the NDZ under the banner of tourism. In richly populated area of Kerala, NDZ should be reduced to 25 meter and to 50 meter where population density is low. Home stay should be restricted to only coastal people.</p>			364

		<p>Mining to be forbidden in CRZ. Ban eco-tourism in mangrove areas. Tourism should be permitted only beyond 50 meter of HTL. Fishermen should be permitted to build houses without any restriction on FSI. No permission for construction should be given in CRZ-I except for defence purposes.</p>
365	Doshi & Co. Mumbai	<p>There are very few areas in NDZ-III with high density population. Standard NDZ of 50 meter should apply. There is tremendous scope of development of tourism industry, which shall ensure huge employment opportunity for rural communities. This will reduce mass migration to urban cities and ease the pressure on the infrastructure of already saturated cities.</p>
366	Sachin Parab	<p>Saltpans were not naturally formed and were mostly created artificially for salt harvesting. With stoppage of such activities, the land is left barren. Such land, however, is to be dealt with CRZ-I B, as per the Notification. It is suggested to taken such land out of the purview of the CRZ-I B for utilising precious land for development.</p>
367	<p>Pondey citizen action network Banerjee President, PandyCAN</p> <p>Indian Chemical Council (ICC)</p>	<ul style="list-style-type: none"> • Draft weakens coastal protection and threatens livelihood of coastal communities. • S. N. Committee Reports were non-inclusive and closed process. • Draft needs to be discarded. The process of CZMP needs to be completed first, including the mapping hazard line and village development plans. • Impose moratorium on setting up of new ports and expansion of existing ports. • Coastal protection and fisher livelihood should be strengthened through a Fisher Rights Act and a Coastal Protection Act.
368	Nagar Advocacy Governance Renewal	<ul style="list-style-type: none"> • CRZ in creek area should be at least 100 meter against proposed 50 meter. • Equal level of protection should be offered to all categories of mangroves.
369	Balamurugan.PS	<p>CRZ-III A and III B could be divided into urban and rural areas. For tidal influenced water bodies, NDZ may be kept as 20 meter. “Tourism Development Projects” to replace beach resorts/hotels in Clause 5.3 (iii) A. The word “existing” in the definition of CRZ-II under Clause 2.2 should be clarified. “Beach resorts and hotels” to be modified as “Tourism Development Projects” in Annexure-III under CRZ-III. FSI for Tourism Development Projects may be permitted in CRZ-III areas at 0.5 with open areas to be suitably landscaped with proper vegetal cover.</p>

	370	<p>GBA office Goa Bachao Abhiyan</p> <p>Overall height of construction for tourism development projects in CRZ-III may be permitted at 13 meter with number of floors as 3 (G+2). In Annexure-V (Undertaking), signature of the applicant and date of submission of application may be included and suitable undertaking by the proponent as in Form-I of EIA Notification, 2006 is also suggested. Geo coordinates of the project sites are suggested to be included in the project details.</p>	<p>NDZ should not be reduced. It is a regressive measure. CRZ-I should not be sub-divided into A & B. It should be off limits for any development except national security or emergency. In view of poor record of waste management and water pollution treatment, facilities for waste and effluents may not be permitted in riverine and coastal areas in CRZ-I. Eco-tourism activities such as tree huts would also require toilets, sewage etc., which will be damaging to the environment and should not be permitted in the ESA. Schools, Dispensaries and community toilets should not be permitted to be built in the buffer zone between 100-200 meter of CRZ-III. Memorials/monuments should not be permitted in CRZ-IV. Environment is more important. Dispensing with the requirements of examination by CZMA in respect of self-dwelling units upto 300 sq. mt., does not look at traditional occupational rights but for the benefit of healthy land owners and stakeholders. Punitive measures should be defined for violations of the Notification. CRZ for backwater Islands should be same as that for main land as backwaters do not follow different rules of nature. Mangrove buffer should be provided irrespective of whether they are in a private or a public area. Buffer zone should be prescribed for turtle nesting sites and horse shoe crab habitats as well. Entire Malvan should not be considered as CVCA and should be included in CRZ-II, as per norms. Only identified areas should be protected and stipulated in the NDZ and Green Zone. Permissible activities in various categories should also be permissible in CVCA.</p>	371	<p>Amol Sarat.</p>	<p>372</p> <p>Kuzhuppilly GP + 1 Representation</p>	<p>Density of population should not be counted at Panchayat level to but Islands as a whole in backwater Islands of Kerala. Barrier Islands should also have a NDZ of 20 meter. Government Housing Schemes to be taken out of purview of the NDZ. Some laws linked with nature should be beyond change. The CRZ Notification was aimed to protect coastal stretches and should not be diluted.</p>	<p>373</p> <p>Alina Saldanha Goa</p>
--	-----	---	--	-----	--------------------	---	--	--

		<p>The draft did not consult majority stakeholders residing in coasts. Reducing NDZ would expose people and the land to the fury of the ocean. Reduction in NDZ will only benefit industrialists who would destroy the natural barriers of protection along the coasts. Reduction in NDZ would lead to increase in quantum of storage, garbage and waste polluting the waters and endangering sea life. Upto 200 meter of HTL has so far been free and open to public to enjoy sea and nature. Reduction in NDZ will deprive such freedom NDZ of 200 meter should be retained and should not be diluted.</p>
374	Richard Soares Devon Real Estate & Construction Pvt. Ltd. Goa	<p>There should be no distinctions between CRZ-III A and III B for State like Goa. Change in land use may also be permitted while reconstructing the authorised buildings. Landscaping and swimming pool etc. could also be included on the seaward side of the Highway road in NDZ areas. Withdrawal of ground water, upto 10 meter below the ground level, should be permitted. Repairs/renovations of existing residential structures in CRZ area should not require clearance under CRZ and EIA Notifications. Validity of clearance should be increased from 7 years to 10 years. Extension of validity of clearance be accorded for two terms of 3 years each. In CRZ-III areas, the maximum height may be increased by 3 meter from 9 meter for accessing the roof to maintain services at the roof level. Gaps between two beach resorts/hotels to allow public access to the beaches needs to be clearly defined.</p>
375	NV beach Resort Calangute	<ul style="list-style-type: none"> • Reduction in NDZ will prove to be fatal in wake of Global Warming and sea level rise. • Natural vegetation and sand dunes should not be destroyed.
376	Shaji Kumar	Kadaltheerathu. Ninum 3 meter height ulla land C R z. L ninnum ozhivaakkanam
377	MADAN NAYAK	<ul style="list-style-type: none"> • The limit of population density of 2161 for CRZ-III A areas should be reduced to 1000. • Identified beaches for tourism development should have a NDZ of 50 meter in CRZ-III.
378	Joseph augustine	Ecologically non-sensitive areas should permit people to construct residential buildings upto 100 sq. mt. within 10 meter from HTL.
379	Urmi chemicals Mumbai	<p>Storage terminals should also be allowed to handle similar products in Annexure-II, which will help in promoting business. Products, which are permitted to be handled by the pipeline and port jetties should also be allowed to be handled at storage terminals in Port land.</p>

<p>380</p> <p>Roshan Mathias (from Goa)</p>	<ul style="list-style-type: none"> • Some laws linked with nature should be beyond change. The CRZ Notification was aimed to protect coastal stretches and should not be diluted. • The draft did not consult majority stakeholders residing in coasts. • Reducing NDZ would expose people and the land to the fury of the ocean. • Reduction in NDZ will only benefit industrialists who would destroy the natural barriers of protection along the coasts. • Reduction in NDZ would lead to increase in quantum of storage, garbage and waste polluting the waters and endangering sea life. • Upto 200 meter of HTL has been free and open to public to enjoy sea and nature. Reduction in NDZ will deprive such freedom • NDZ of 200 meter should be retained and should not be diluted. 	<p>381</p> <p>Indo Energy International ieil@shipport.com Ltd. Navi Mumbai</p>	<p>In Clause 5.1.2 (i) (a) permits reclamation of land for developing ports. Associated port infrastructure also needs to be included in the permissible activity. In major ports, rail connectivity is a necessity within port area and is integral to the growth and development of a port. Rail connectivity, therefore, needs to be specifically mentioned in Clause 5.1.2 of the Notification.</p>	<p>382</p> <p>Venkatraman Naik</p>	<ul style="list-style-type: none"> • The draft is anti-nature and will harm environment and needs to be scrapped. • The CRZ laws must completely ban all hotels, industrial estates and concretisation in the CRZ. 	<p>383</p> <p>Urbdes Rajesh Urbdes09@gmail.com Mumbai</p>	<p>Para 5.2 (ii) needs to be modified as "Construction of buildings for residential purposes, schools, hospitals, institutions, offices, public places etc. as permissible under local town and country planning regulations as applicable from time to time, shall be permitted on the landward side of the road (Existing or Proposed) included in the approved Developmental plan applicable on the date of this notification, or on the landward side of existing authorized fixed structures or on the landward side of structures protected by any state laws/policy, provided that no permission for construction of buildings shall be given on landward side of any new roads which are not a part of approved Development plan and which</p> <ul style="list-style-type: none"> • Benefit of relaxed Coastal Regulatory Zones should be granted by respective planning authorities, till finalisation of the CZMPs. • Method to determine width of creek should be clearly defined. • 50-meter buffer along the mangroves should be maintained with green belt under social forestry or gardens, which would serve as barrier to encroachment.
---	---	--	---	------------------------------------	--	--	---

		<p>are constructed on the seaward side of an existing road.”</p> <p>Para 5.2 (iii) needs to be modified as “Buildings permitted as in (ii) above, shall be subject to the local town and country planning regulations, and the norms for the Floor Space Index or Floor Area Ratio prevailing as applicable from time to time. It shall be the responsibility of the concerned Town Planning Authority to ensure that the Solid Wastes are handled as per respective SWM rules and no untreated sewage is discharged on to the coast or coastal waters. These norms for development in various categories of CRZ areas shall be made applicable with immediate effect from the sanction of this notification.”</p> <p>Para 5.2 (iv) needs to be modified as “Implementation of various Redevelopment schemes for redevelopment / reconstruction of authorized buildings, existing structures protected by any state laws/policy shall be permitted, subject to the local town and country planning regulations, and the norms for the Floor Space Index or Floor Area Ratio, applicable from time to time. It shall be the responsibility of the concerned Town Planning Authority to ensure that the Solid Wastes are handled as per respective SWM rules and no untreated sewage is discharged on to the coast or coastal waters.”</p> <p>Para 10 needs to be modified as “In order to protect and preserve the “green lung” of the Greater Mumbai area, all open spaces, parks, gardens, playgrounds indicated in development plans within CRZ-II shall be categorized as No Development Zone. A Floor Space Index up to 15% shall be allowed only for construction of civic amenities, stadium and gymnasium meant for recreational or sports related activities and the residential or commercial use of such open spaces shall not be permissible. Provided further, if such open space use as shown in development plan is partly/fully encroached upon by authorized buildings, or existing structures protected by any state laws/policy, the area occupied by the authorized buildings, or existing structures protected by any state laws/policy together with appurtenant spaces remain in CRZ-II and only VACANT portion shall be categorized as NDZ.”</p>
384	<p>Bcsf goa Benaulim Civic & Social Forum Goa</p>	<p>No new Ports/expansion, jetties, ship repair docks, marinas, casinos or tourism should be allowed in CRZ.</p> <p>Special status accorded to Khazan lands in Goa has been taken away in the new draft. They are important socio-economic assets for Goa and home to rare and endangered migratory birds besides other endemic and protected flora and fauna. CRZ law must make a provision for protection of such Khazan lands.</p>

353

		<p>Draft allows more development by changing of zones definition, adding of new zones and elimination of hazard line. This is a focussed dilution of CRZ, 2011.</p> <p>Coastal industries such as thermal power plants, desalination plants, waste treatment plants, non-conventional energy generation etc. have been permitted, which were earlier regulated.</p> <p>The draft favours coastal tourism agenda.</p> <p>It promotes non-traditional activities without understanding of fisheries.</p>
385	Jagdish Talreja KALPA-TARU Ltd.	<p>CRZ limits and classification should not be dependent on finalisation of CZMP and should be approved by the concerned State Coastal Zone Management Authority.</p> <p>FSI regulations should be as from time to time and not as on the date of the Notification.</p> <p>For appraisal of projects for CRZ clearance, a comprehensive EIA, Risk Assessment Report and Disaster Management Plan etc. should not be applicable for building/construction schemes.</p>
386	Ram saren Kl_saran@rediffmail.com Tamilnadu	<p>Notification dilutes the protection afforded by earlier notification.</p> <p>Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches.</p> <p>Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities.</p> <p>Draft promotes development without understanding of the fisheries.</p>
387	Shyam Bane + 9 representations	<p>Standard NDZ of 50 meter to be applied in CRZ-III areas.</p> <p>There is a mixed tourism and development potential in the coastline and should be exploited by like Dubai.</p>
388	Ajay Nair	<p>CRZ zoning and other relaxations should not be dependent on finalisation of CZMPs and should be granted by respective planning authorities.</p> <p>Width of creek is difficult to be ascertained so defining CRZ boundaries will be difficult.</p> <p>FSI should be permitted as applicable from time to time.</p> <p>The less strict and milder CRZ draft will help development of coastal areas.</p>
389	Mascot Kannur	<p>Coastal areas are most attractive for tourism 2 to 3 floor building should be permitted on the side of the road irrespective of distance from the sea.</p>
390	Rajveen .KP	
391	Nicholas Fernandes	<p>CRZ draft is against the interest of Goa, Goans and the environment and should not be implemented.</p>
392	Shri Vandh Grampanchayat Gujarat	<p>Language Gujarati</p>
393	Vaibhav Vaze	<p>Notification dilutes the protection afforded by earlier notification.</p>

	Vadhavan Bandar Virodhi Sangharsh Samitee Maharashtra	Reduction in NDZ limit dilution of regulations and elimination of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.
394	Dakshinbanga Matsyajibi Forum (DMF) West bengal	The draft opens up the coast for exploitation by business and corporate houses. No consultation was done with the small and traditional fishing communities. Reduction in NDZ opens up CRZ-III for further construction in activities, increasing the population load and encroachment. The draft should be rescinded and a Comprehensive Regulation Zone Act should be enacted with base on sound, scientific and environmental and social economic principles.
395	Sahil satyawar Naik	DEMAND TO SCRAP DRAFT CRZ NOTIFICATION, 2018 It is most disturbing that while environmental
396	Cavelossim villager's forum Goa	<ul style="list-style-type: none"> • The draft is an attempt to benefit builders and industrialists without accounting for climate change impacts in eco-sensitive and fragile coastal areas. • The CRZ categories should not be regressed. • In case of violations, in addition to the fine and action as per EP Act, the land, sea interface, which has been severely impacted, should be resorted to its original condition by the CZMA. • Only those activities, which essentially require water front, should be permitted in the CRZ. • Land reclamation should be totally prohibited in CRZ. • In case of sea links and coastal transportation links, priority should be given to public transport and rail/metro should get priority over road links. • One-time moratorium may be considered for all residential houses within NDZ areas within 100 meter of rivers, as local communities were misled by concerned Panchayats. • Violations to previous Notifications must not be regularised. • Distance of 100 meter should not be reduced to 50 meter for CRZ in creek areas. • Activities must be regulated upto the "Hazard line" should also regulate activities in the CRZ areas. • "Bay" should be differentiated from the other tidal influenced water bodies as they are directly impacted by tides twice a day.

		397	Seeekumar	<ul style="list-style-type: none"> • Tree huts should not be permitted. • Compensatory plantation of mangroves should be within close vicinity of the affected mangroves. • Para 5.1.2 (iii) should be deleted. Energy can be generated without structures being put up in the inter-tidal zones. • All non-operational facilities should be located outside the CRZ-I-B. • In Para 5.2 (ii), "Fixed Structures" should be replaced by "Buildings". • FSI should not be relaxed in the CRZ. • Traditional fishing communities should be allowed to add one extra floor to accommodate toilet facilities and the increase in size of the family, under Clause 9 (iv).
	398	Anthony Dsouza	<ul style="list-style-type: none"> • Reduction in NDZ limit is not acceptable as the coastline is highly vulnerable to environmental hazard. • The notification should make it clear that all the activities carried out in violation of earlier CRZ Notification will continue to be treated as violation under the new Notification as well. • Coastal Regulation Zone Notification should be replaced by a Coastal Regulation Zone Act. 	
	399	Nisanth GV + 1 representation	<ul style="list-style-type: none"> • Small rivers with width less than 100 meter should be taken out of the purview of the CRZ. • NDZ should not be decreased from existing 200 meter as it will put human lives to danger. • Development within 50 meter of HTL in the NDZ will lead to destruction of vegetation and sand dunes. • Reduced NDZ will lead to loss space for fishermen for their boats, nets etc. • Reduced NDZ will lead to the shore being eaten away and discourage tourists who cherish the beach and not the sea alone. • Existing structures within NDZ of 200 meter from HTL should be regularised. • Transferable development rights should be granted to owners of land in the NDZ, who cannot develop their properties because of CRZ Regulations. • FSI in CRZ-III areas may be increased from 33 per cent to 70 per cent. 	
400	Eruch J. Coutinho	Goa has fragile ecology and should be given special protection. The draft heavily dilutes the protection given to the environment and coastal people and help to increase industrialisation and concretisation. CRZ, 2018 draft should be scrapped and new laws must complete ban hotels, industries, real estate and	Regulation for building/construction should be amended from 200 meter to 100 meter from HTL.	

		concretisation in the CRZ.
401	Alpha Rodrigues	DEMAND TO SCRAP DRAFT CRZ NOTIFICATION, 2018
402	Telson Thomas	For residential purposes, the area limit should be increased to minimum 5000 sq. ft. in CRZ-III.
403	Daman Diu BJP	Because of high population density, land limitation for residential and commercial activities and legally notified urban zone, the entire Daman district may be classified and declared as CRZ-II.
404	Edwin/Diana/Pinto GOANS DABOLIM	<p>The draft is full of deregulations and diminution of environmental legislations without any regard to the principle of non-regression.</p> <p>This is an industrialisation and urbanisation plan aimed at, private profits and not a environment oriented planning tool for public interest.</p> <p>New CRZ law should be an Act of Parliament.</p> <p>No proper consultations were held with traditional communities.</p> <p>The draft did not collect any data, study or any issues related to implementation of CRZ 1991 and 2011.</p> <p>The draft should have been preceded by the finalisation of CZMP.</p> <p>The draft weakens setback lines and removes Hazard line exposing the coasts to the dangers of climate change impacts.</p> <p>The draft favours tourism with sustainable livelihood, industrial activities at the cost of ecology and biodiversity and promotes unsustainable construction by destroying sustainable fisheries.</p> <p>No mining should be carried out in the sand dunes, beaches and sandy areas.</p>
405	Harish Sutar Mariaai Machhimar Sehkaari Sanstha Maryadit Navi Mumbai + 2 representations	<ul style="list-style-type: none"> • Reduction of CRZ limits in creeks to 50 meter is not in conformity with spirit and purpose of CRZ Notification. • In CRZ limits for densely populated CRZ-III areas will not guarantee use for occupational/residential needs of fishing community. • “Public Utility” proposed in mangrove buffer should be clearly defined. • FSI should have been completely frozen as per the older Notification and not relaxed. • Tourism facilities along the National/State Highways will not ensure safeguards against polluting the coastal waters. • Penalties for non-compliance should be clearly specified. • The draft laws on Mumbai obviously for the benefit of the developers. Other cities like Mangalore are more vulnerable but there are no special concessions. • Location/Area for compensatory plantation of mangroves should be clearly defined. • Construction in CRZ-II should be permitted to ground+2 floors as there are many fishing

355

		<ul style="list-style-type: none"> • Land for the housing and fishing needs of the local authorities should be reserved in CRZ. villages, which do not have space to expand.
406	Anonymous Goan riders	<ul style="list-style-type: none"> • The draft dilutes the projection given to the coastal environment. • New CRZ laws to be framed must completely ban hotels, industries, real estate and concretisation in the CRZ. • All past violators should be punished severely and poor coastal dwellers must be given their rights.
407	Chandra M	<ul style="list-style-type: none"> • The regulation line for building construction should be reduced from 200 meter to 100 meter from the HTL.
408	Viral Pandya	<ul style="list-style-type: none"> • Clearance to Port Jetties should also include facilities integral to the Jetty like pipelines, liquid storage terminals in Port premises. • Products permitted to be handled in Port Jetties should also to be permitted for pipelines liquid storage terminals in Port premises.
409	Antonio Mascarenhas	<p>These 7 scientific papers may please be considered so as to understand. Coasts need to be protected and not opened up for indiscriminate commercial use.</p>
410	Viriato Fernandes Co-convenor Goencho Aavaaz	<p>CZMPs should have been framed earlier to the revision of the 2011 Notification.</p> <p>Draft Notification is more of industrialisation and urbanisation plan and not environment oriented planning tool.</p> <p>Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours.</p> <p>Reclamation should be totally prohibited.</p> <p>Any construction of beaches, No Development Zone and CRZ-I should be completely prohibited.</p> <p>No mining should be promoted.</p>
411	Shri Kovaya Grampanchayat Gujarat	Language (Gujarati)
412	Chidanand Kulkarni Karle Properties Builders & Developers	No specific comment
413	Ratig sayad	In CRZ-III A & B, the area up to 100 mts from the HTL on the landward side shall be earmarked as the No Development Zone (NDZ).

	<p>Land reclamation and bunding etc. shall be permitted only for activities: Foreshore facilities like ports, harbours, Jetties, wharves, quays, slipway, bridges, marinas, Water boat anchoring facilities, water sports and sea links etc.</p> <p>CRZ III permissible activity: Facilities required for agriculture, horticulture, gardens, pastures, parks including animal shed of 20 sqmt for 2 acres of plot, security porta cabin not more than 10 sq.mt for 1 acre and above plot.</p> <p>Comprehensive EIA, Risk Assessment Report, Disaster Management Plan and Consent to establish should not be applicable for building construction projects.</p> <p>Backwater islands along with space limitations in such coastal stretches, CRZ of 20 mts. 50mts from the HTL on the landward side shall uniformly apply.</p> <p>Existing dwelling units of local communities may be repaired or reconstructed within 20 mts 50 mts from the HTL of these islands.</p> <p>Greater Mumbai:</p> <ul style="list-style-type: none"> • Provided further, such open space uses as shown in development plan is partly/fully encroached upon by slums/CESS buildings/tolerated structures etc., that much encroached area with appurtenant spaces remain in CRZ-II and only VACANT portion shall be categorized as NDZ. • Provided further, in case of development/redevelopment on plots situated within limits of Greater Mumbai, the condition of “landward side of existing road or existing authorized fixed structure” shall not be insisted, in view of the fact that the Mumbai is made of 7 islands joined together • For mangroves falling within limits of Greater Mumbai, buffer zone shall not be classified as CRZ-I.
	<p>No activities shall be permitted in and around 200 mts of the turtle nesting ground. Add in Annexure II: TCC 90 granules for swimming pool water filtration.</p> <p>The total covered area on all floors shall not exceed 33 50% per cent of the plot size i.e., the Floor Space Index shall not exceed 0.33 (0.50).</p>

		Height of construction up to the highest ridge of the roof, shall not exceed 9.11 metres. Excavation of swimming pool in sandy stretches shall be permitted between 200 to 500 mts of High Water Line.
414	Meleni Fernandes	Demand To Scrap Draft CRZ Notification, 2018.
415	Jesida Fernandes	DEMAND TO SCRAP DRAFT CRZ NOTIFICATION, 2018.
416	Bhushan Walanju + 1 representation	CZMP as per CRZ notification 2011, should be continued and followed and proposals should be approved accordingly until new CZMP is framed. To protect the green lung of the greater Mumbai, all existing unencumbered open spaces, parks, playgrounds indicated in development plans within CRZ II shall be permitted to be subject of local town and country planning regulations and FSI or FAR as applicable time to time. CRZ limit should be 50 mtr. from HTL so that there will be scope for development of Coast.
417	Moreswar darmode	DEMAND TO SCRAP DRAFT CRZ NOTIFICATION, 2018.
418	Shamin Pereira	Para-V provides for Areas requiring special consideration. Para-V (b) (ii) provides for Slum Rehabilitation Schemes in this said Para there was no requirement for Slum Rehabilitation to be on the landward side of the two authorised fixed structures. Similarly, Dr. Shailesh Nayak Committee report also has recommended no such restrictions. It may be stated that object of the CRZ relating in City of Mumbai as entire Coastal Zone is occupied by Slums and Slum Dwellers live in amount inhuman condition. Further they have danger of Rise of sea level and Heavy floods. Both the objects of CRZ Notification -2011 and Draft CRZ Notification-2018 inter-alia to mitigate danger of natural hazards in the coastal areas, sea level rise due to global warming.
419	Balvant Desai Ex Minister for State, Urban Development Department, Govt. Maharashtra	In Draft CRZ Notification 2018 in Para 5.2 CRZ-II- (ii) provides as follows: In above para there is tremendous congestion in Slum Area and large chunk of CRZ area in Mumbai city will not be available for rehabilitation if above restriction is not removed.
420	Catapult Realty	Clause 5.2(iv): The said Clause 5.2(iv) of this draft notification should be modified to also allow for redevelopment of authorized structures and slums that are protected under State Legislation in CRZ-II lands of Mumbai without putting restriction of present land use. Clause 10.3(i)

		The plots in CRZ-II reserved for Open Spaces indicated in the Development Plan and encumbered with Authorized Buildings, Slums Protected under State Legislation should be kept outside the ambit of this clause and development on such plots in CRZ-II should be permitted as per Clause 5.2(iv) modified.
421	Sunny Recreational Property Developers Pvt Ltd + 4 representations	No specific comment Correct the draft CZM plan that shows the land bearing Gut nos. 308, and 312 of village , Milkahthkar, Taluka Alibaug, Dist. Raigad as CRZ-I, CRZ-IB, and CRZ-III.
422	Jpr romalt Address in Regional Language	Remove fragmentations relaxing clauses for the coast of Gulf of Mannar. Plot corals, pearl banks, fish breeding and fishing zones in maps, and also retain pollution mapping of the sea as per CRZ 2011 in CRZ 2018 Notification.
423	Ramesh Dingle Objections of City and Industrial Development Corporation of Maharashtra (CIDCO), Navi Mumbai	Land for compensatory plantation of mangroves is not available, equivalent plantation of trees in suitable area as compensation shall be permitted. Mangroves containing at least 100 trees and width not less than 15 m. if area is less than 1000 sqm than such area should be considered as normal trees. Mangroves in private land and urban areas will not require a buffer zone. Villages rural areas should be including in CRZ III A & B based on the condition of density. Already approved projects by the state government should not consider. The destruction of bunds by villagers for making the ponds should not be considered as a tidally influenced water body.
424	Madhusoodanan V.K.	Draft notification 2018 will destroy the entire coastal ecosystem including mangroves, inter tidal zone, back waters and the biodiversity. The present 100 m or the width of the creek which ever is less is to be retained. In CRZ III A area up to 200 m from HTL should remain as it is. Monroethurth in Kollam District in Kerala having of tiny islands of size 2 m to 10 m width, which needs special consideration. Of included in a CVCA. Ecotourism activities should not be allowed in CRZ IA areas. No other activities except for defence purpose be allowed in the public and private mangrove forests.
425	Shalin Shah	Mangroves. In case mangrove area is more than 1000 sq. mts (Density should be specified), a buffer of 50meters along the mangroves shall be provided and such area shall also constitute CRZ -IA. Biologically active Mudflats; Comment: Mudflats do have organic carbon in varying concentration which forms biomass and facilitates some biological activity due to presence of air, sunlight and water. Considering this fact all

CSW

<p>mudflats are not same and can't be treated uniformly as biologically active mudflat.</p> <p>Turtle nesting grounds; Comment: All such locations can't be considered as Eco Sensitive Area as they are not permanent. Therefore, only permanent locations with historical evidences of mass nesting should be considered as Eco Sensitive Area.</p> <p>Nesting grounds of birds; Comment: It shall be limited to IUCN Red Category/Schedule 1 Species</p> <p>Prohibited activities within CRZ Manufacture or handling of oil, storage or disposal of hazardous substances as specified in the notification of MoEFCC should not be applicable to CRZ II & CRZ III areas of notified ports</p> <p>Ports and Harbour Projects shall be permitted in high eroding stretches with due shore protection measures</p> <p>Regulation of permissible activities in the CRZ In the mangrove buffer, only such activities shall be permitted like laying of pipelines, transmission lines, conveyance systems/mechanisms and construction of road on stilts etc. that are required for public utilities. Comment: Mangrove buffer can't be made applicable in already approved / developed areas. In addition to above Greenbelt development shall also be permitted in the mangrove buffer areas.</p> <p>CRZ- I B - The inter tidal areas Comment: Road and Rail on culverts or stilts should be permitted through hydrodynamic study ensuring free flow of water. Comment: Hazardous substances should be defined for better understanding. Comment: The list as per Annexure – II are essential commodities for the country and should be permitted. Therefore, last phrase "provided that such facilities are for receipt and storage of fertilizers and raw materials required for fertilizers, like ammonia, phosphoric acid, sulphur, sulphuric acid, nitric acid etc." should be removed.</p>		
---	--	--

		<p>Ship Building/Ship Repair, Ship Recycling and Dry Dock shall be permitted CRZ II</p> <p>CRZ clearance for permissible/ regulated Activities-Delegations</p> <p>Comments: Change in product mix/configuration of approved project activities having no net incremental pollution load shall be appraised and approved at State Level.</p> <p>Other Comments: In case of Change in Product Mix/Configuration of approved project activities only SCZMA will take decision on the basis of justification / PFR / Technical Study Report and there shall be no requirement of Comprehensive EIA</p> <p>Project/Activity which are listed under Category 'B' of Schedule I of EIA Notification, 2006 shall be appraised at State Level Environment Impact Assessment Authority</p> <p>Validity should be 10 Years minimum which shall be further extended to 5 years additionally.</p>
426	Archsurveyors Architects & consultants Mumbai	<p>CZMP shall be continued and followed and proposals should be approved accordingly until the revised/updated CZMP is framed and made applicable by the respective coastal state/UT's.</p> <p>To protect the green lung of greater Mumbai, all existing unencumbered, shall be categorized as NDZ.</p>
427	Chandrakant Humbe	<p>This is in reference with above subject matter, kindly request you keep CRZ limit till 50m from HTL so that there will be scope for development of Coast.</p>
428	Sandip Kondvilkar	<p>This is in reference with above subject matter, please remove the condition of CRZ limit till 200 m & reduce the limit to 50m from HTL</p>
429	J.M Miranda- Margao + 27 Representations	<p>Notification dilutes the protection afforded by earlier notification.</p> <p>Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches.</p> <p>Draft facilitates development, industrialisation and urbanisation by reducing environment protection.</p> <p>Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities.</p> <p>Draft promotes development without understanding of the fisheries.</p>
430	Mandar Barbhai Flat No.901, Building No. D-3, Lak Town Co-Op HSG Society, S.No.11, Katraj,	<p>In clause 2.3.2 relation to CRZ III A & B, the NDZ area from HTL should be uniform in entire coast.</p> <p>In clause 5.3 (ii) (a) for repair of existing structures, construction of water bodies, lotus ponds, fish ponds etc., for beautification of the landscape may be permitted.</p> <p>In clause 5.3 (ii) (g) the facilities of temporary/ portable swimming pools, temporary kitchen and a</p>

58

Pune-411046, Maharashtra	Raymond Desa, President Goa-403802 goabarge@gmail.com	Arjun Sharma, Co-Chairman Committee on Tourism and Hospitality 23, Institutional Area, Lodi Road, New Delhi-110003 E-mail: co- chairman.tourism@cit.in	433	<p>helpad in case of star category hotels shall be permitted.</p> <p>2.3 CRZ III The NDZ should be applicable in areas falling within notified Port limits.</p> <p>5.1.2 CRZ IB Land reclamation and bunding etc. should also be permitted for dry-docking facility, barge/Inland vessels, berthing, repairs, anchorage etc.</p> <p>Boats, ships, floating vessels, pontoons etc. registered with local authorities should be permissible to be operated, anchored and parked in CRZ-IV A and B areas.</p> <p>Mannade bunds between farm lands and rivers with sluice gates should be out of the CRZ purview.</p> <p>Threshold of 1000 Sq. Mtr. For mangrove buffer should be increased as lot of land areas come under buffer zone hampering economic activity.</p> <p>Sand dunes more than 2-meter height only should be considered as CRZ-1 A.</p> <p>With a population density index of 2161, none of areas in Goa will fall under CRZ-III A. This threshold should be 800 per Sq. Mtr.</p> <p>Manual sand mining should be permitted in CRZ-1 B.</p> <p>People would loose employment if sand mining is banned.</p> <p>Bunds, sluice gates, ramps and fishing jetties etc. should be permissible under 5.1.1 (ii).</p> <p>Dry dock to be included in 5.1.2 (i) (a).</p> <p>Shipyard and associated facilities to be included in 5.1.2 (ii).</p> <p>Temporary events like beach wedding, beach sport events should be permitted in 5.1.2.</p> <p>Anchoring, parking of vessels, ships, boats should be allowed under 5.1.2.</p> <p>High Mast Lights, security cabins and public safety infrastructure along with facilities for disabled should be allowed under 5.1.2.</p> <p>Bunds, sluice gates, ramps and fishing boats to be permitted in 5.3 (ii) (h).</p> <p>“Existing roads prior to 1991” to be added in Clause 5.3 (ii) (f) along with National and State Highways.</p> <p>Height restriction in CRZ-III for buildings to be increased from 9 meter to 12 meter to get elevation in enhanced tourist experience. Construction of G+2 floors may be permitted.</p> <p>Small scale commercial activities like restaurants, grocery shops, bars, handicraft shops etc. may be permitted along with home stay.</p> <p>Dredging of rivers to be permitted.</p> <p>Projects related to repairs, reconstruction and maintenance may not be required to be appraised by MoEF and SEIAA.</p> <p>FSI for hotels, resorts in CRZ-III areas may be increased from 0.33 per cent to 0.5 per cent.</p> <p>Areas located at hilltop or at a height of more than 20 meter above Msl. should be excluded from the</p>
431			432	
433				

	<p>Member of Parliament, Lok Sabha Shetty House, Lokmanya Tilak Nagar, Kandivali (West), Mumbai-400067 helpdesk.gopalshetty@gmail.com</p>	<p>ambit of CRZ. The reduced CRZ limits in creek may not be dependent on finalisation of CZMP and may be verified by local planning authorities. As per orders of Mumbai High Court, buffer zone for mangrove in CRZ-III should not be considered CRZ-I A. The buffer can be utilised for construction of roads or gardens for recreation. Building/redevelopment activities in CRZ-II, may also be permitted on landward side of structures protected by any State laws/Policy. Reconstruction in CRZ-II may be permitted without any hazardous waste or industrial waste. The stipulation of "without change in the present land use" is arbitrary. CZMPs should be finalised by States themselves within 18 months and should not require approval of MoEFCC. MoEFCC may just have these plans for records. A distinction between "sea front" or "tidal influenced bodies" should be made and CRZ classification done accordingly by MoEFCC in consultation with NCSCM as and when referred to by the State CZMA. EIA studies, NOC from NBWL, disaster plans etc. should not be stipulated for appraisal of residential/commercial projects.</p>
434	<p>S.B. Bose, Deputy Secretary, Department of Atomic Energy, Anushakti Bhavan, CSM Marg, Mumbai 400001 dsim@dae.gov.in</p>	<p>Mining of atomic minerals should be permissible activity in NDZ under Para 2.3.3. Mining of atomic minerals may be permitted selectively in CRZ-I A under Para 5.1.1 with a clause for compensatory plantation of mangroves. Mining of atomic minerals including beach and sand minerals (Ilmenite, Rutile, Zircon, Monazite, Leucosene, Sillimanite and Garnet) to be specified under various clauses under which the activity is permissible including CRZ-IV A for imparting better clarify. For project attracting both CRZ as well, EIA Notification, Rapid EIA may be prepared based on TOR issued by the EAC or SEAC under EIA Notification. In Para 1.9 (ii) (a) of Annexure-I, mining of atomic minerals may be permitted occurring as such or in association with other minerals. Under Para 3 (H) of Annexure-V in context of mining proposals, the following details should be obtained from the Proponent: Government order for mining lease/exploration/production lease, approved mining plan details, extent of mining lease area, capacity of mining, type of minerals to be extracted and end use of the mineral.</p>
435	<p>D.K. Mogaveera Mahajana Sangha,</p>	<p>CRZ -III A. Demarcation of No development zone should not be based on the density clause. 2.3.2 CRZ III B. permits the construction of fisherman dwellings in NO Development Zone.</p>

	Mahalakshmi Nagra, Udipi	436	Pavity Jinwar Kodi, Malad, Mumbai, Maharashtra + 120 Representation	<p>New draft CRZ no provision for protection of traditional fisherfolk of coastal area.</p> <p>Give more importance to fisher communities; fishermen are more than 10 crores all over the coastal belt.</p> <p>CRZ Notification, 2011 is better than this Draft, 2018</p> <p>Draft notification, 2018 should be finalised after the consultation of fishing community.</p> <p>NDZ should not be reduced.</p>	<p>Objection in Draft CRZ Notification, 2018</p>	<p>Chairman, Raigad Jiha Machhimar Madhy. Sahakari Sangh Ltd. Raigad, Maharashtra</p>	<p>437</p>	<p>Withdraw the draft CRZ 2018.</p> <p>Ensure the life and livelihood of the coastal communities.</p> <p>The draft stands in violation of section 3 of the Environment protection act, 1986.</p> <p>Draft CRZ 2018 notification should prepared after consultation with the coastal fishing communities and concerned citizens.</p> <p>We object the CZMP under the CRZ, 2011 of Tamilnadu and with respect of Kanyakumari District.</p> <p>This Draft will benefit the industry for the massive port development projects.</p> <p>The distance between the HTL and land has been reduced from 200m to 50 m. that is not appropriate.</p>	<p>General Secretary, Kanyakumari Maavatta Meen Thozhilalar Sangam, Tamil Nadu</p>	<p>438</p>	<p>Arvindbhai Tejani, Surat Gujarat</p>	<p>439</p>	<p>Draft CRZ rules and regulations are in conflict with our old sanctioned plans as per development permission from Gram Panchayats and, therefore, there is a great trouble to construct as per sanctioned plan. It is requested to give relaxation as a special case for permitting old sanctioned plans irrespective of the new regulations.</p>	<p>FIPMI President.fipmi@gmail.com</p>	<p>440</p>	<p>Mining of atomic minerals should be permitted selectively in NDZ under Para 2.3.3.</p> <p>Mining of atomic minerals may be permitted selectively in CRZ-I A under Para 5.1.1 with a clause for compensatory plantation of mangroves.</p> <p>Mining of atomic minerals including beach and sand minerals (Ilmenite, Rutile, Zircon, Monazite, Leucoxene, Sillimanite and Garnet) to be specified under various clauses under which the activity is permissible including CRZ-IV A for imparting better clarity.</p> <p>For project attracting both CRZ as well, EIA Notification, Rapid EIA may be prepared based on TOR issued by the EAC or SEAC under EIA Notification.</p>
--	--------------------------	-----	--	--	--	---	------------	---	--	------------	---	------------	---	--	------------	--

		<p>In Para 1.9 (ii) (a) of Annexure-I, mining of atomic minerals may be permitted occurring as such or in association with other minerals.</p> <p>Under Para 3 (H) of Annexure-V in context of mining proposals, the following details should be obtained from the Proponent: Government order for mining, lease/exploration/production lease, approved mining plan details, extent of mining lease area, capacity of mining, type of minerals to be extracted and end use of the minerals,</p>
441	<p>President, Kharekuran Macchimar Sarvodaya Sahakari Sanstha Maryadit, Palghar, Maharashtra Emai: Kharekuran@gmail.com + 1 representation</p>	<ul style="list-style-type: none"> • The draft is an attempt to benefit builders and industrialists. • CRZ category should be as per the baseline of 19th Feb., 1991. • Violations to earlier CRZ Notifications should be treated as violations under the new violations policy. • Only those activities, which require water front, should be permitted within CRZ. • Residential, commercial and industrial activities that do not require water front should not be permitted in CRZ. • Reclamation should be prohibited to residential, commercial and industrial activities, SEZs and road construction. • Discharge of untreated waste should be completely prohibited. • Natural eco-systems like mangroves should not be destroyed to be replaced with artificial sewage treatment plant. • In case of coastal and sea transportation links, priority should be given to public transport. • Inspection carried out to agencies should include GO tag photographs. • Mangroves in private land should also require buffer. • CZMPs should have been framed earlier than the new draft. • Draft permits areas between HTL and Hazard line for development and is an invitation to disaster. • Rational for demarcating CRZ-III A & B based on population density is not explained. • No restriction of quantity of ground water that can be drawn, has been stipulated. • Construction should not be permitted in CRZ-I areas. • Draft favours coastal tourism over coastal livelihoods. Eco-tourism and mangrove trails should be run by community based Fishers' Cooperative Society. • Draft favours coastal industrial development over ecology and biodiversity. • Clearance procedures should not be totally decentralised to CZMPs.

443	Jaya Gauri Upadhayaya, Goa Mahendra Bhatt, 68, Gujarat Vihar, Delhi	Scrap the draft CRZ notification, 2018. Reducing the NDZ area from the existing one will be implemented in entire coastline of India that is not acceptable. This draft notification is only in favour of builders and industry.
442		<p>Scrap the draft CRZ notification, 2018</p> <ul style="list-style-type: none"> • Special provisions to CRZ areas like Mumbai, Goa and Kerala for protecting the coastal environment have been diluted. • S. N. Committee only met government agencies. Civil Society, local fisher folks and environmental groups were not consulted. • CRZ in creek should be 100 meter or width of the creek, whichever is more. • Bay should be excluded from the purview of creek/tidal influenced bodies. • All mud flats should be considered as ESAs. • Tree huts should not be permitted. • Compensatory mangroves plantation should be in close vicinity. • Non-conventional energy should not be encouraged in inter-tidal zone. • Fixed structures to be replaced by "buildings". • FSI should not be relaxed. • Temporary facilities in beaches should be permitted only for specific time. • No mangrove should be permitted in CRZ-IV. • Para 7 (vi) related to self-dwelling units should be deleted. • EIA report should be mandated for residential buildings with more than 10000 Sq. Mt. built up area. Commercial buildings should not be permitted in CRZ. • In Clause 8 (vii) it should be added that the CRZ clearance shall be automatically suspended after 30 days following the due date, in case compliance reports are not uploaded on the project proponent's website. • Traditional fishing communities should be allowed to add one extra floor on their existing ground floor structure to accommodate a toilet and increase in size of the family. • In Para 10 (i), 3.3 should be replaced by 3.1. • "Authorised" should be added to the dwelling units in Para 10 (ii) (a). • All mangroves should require buffer. • We register our total and complete opposition and rejection to the draft CRZ Notification, 2018.

		<p>Subdivision of CRZ will dilute the coastal protection and shall become more hazardous to the local inhabitants and will also affect the ecology of the area.</p> <p>The draft notification should have been prepared with public consultation and persons residing or working in the coastal areas.</p>
444	<p>Sanjiv Kalsa, Secretary, Rupnarayanchak Fish Landing Centre, 9083152407 + 2 representations</p>	<p>Draft relaxes restriction on activities detrimental to coastal environment.</p> <p>Small and traditional coastal fishing communities were not consulted.</p> <p>Draft was published only in English.</p> <p>Draft does not mention that violations to earlier CRZ Notifications will continue to be booked under the proposed CRZ, 2018.</p> <p>As directed by NGT, CZMPs should have been finalised first.</p> <p>Draft should be rescinded and a comprehensive Coastal Regulation Zone Act must be enacted</p>
445	<p>Secretary, Harbadevi Machhimar Sarvodar Sahkari Society Ltd., Malad, Mumbai 9323861172</p>	<p>HTL demarcation by NCSCM is unreliable.</p> <p>Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches.</p> <p>Draft facilitates development, industrialisation and urbanisation by reducing environment protection.</p> <p>Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities.</p> <p>Draft promotes development without understanding of the fisheries.</p>
446	<p>Karanja Terminal & Logistics Pvt. Ltd., Navi Mumbai, Maharashtra 91-22-61929000</p>	<p>Port related activities should be permitted in CRZ IA</p> <p>Mangroves should be unconditionally categorized under CRZ IA or minimum density should be considered.</p> <p>The notification not clear the type of construction (administrative building) which can be carried out in port areas and port related activities like bulk cargo like pulses, fertilizers, cement etc. transported in bulk without packing and handling /storage of explosives.</p> <p>Make special provisions for the ports falling in congested area or where non CRZ area is not available near the port.</p>
447	<p>Essel Infraprojects Limited Mumbai</p>	<ul style="list-style-type: none"> • HTL should be co-terminus with HTL existing prior to 1991 where competent authority had earlier demarcated HTL. • This is particularly important that HTL should be along the bunds/embankments not inside the land. • CZMPs should not require approval of MoEFCC. • Salinity of 5 PPT is difficult to be monitored.

448	Machimar Sarvodaya Sahakari Society Ltd, Colaba, Mumbai, Maharashtra 22154716 +1 Representation	<p>• Developmental activities permissible in the development plan should be permitted in NDZ or CRZ-III.</p> <p>• Security, watch towers to be also permitted in CRZ-I B, Facilities complementing temporary tourism, for example, cafeteria, and sit out sheds, recreation etc. to be permitted in NDZ.</p> <p>• FSI to be increased to 1.0 without any height restrictions for Resort.</p> <p>• Mangrove buffer in under CRZ-II should not be treated as CRZ-I A.</p> <p>• Building/construction projects should not warrant comprehensive EIA study and disaster management plan etc.</p> <p>• Any corrections, if required in the CZMPs, should be corrected at the CZMA level without resorting amendment of the CZMPs.</p>	<p>By making legislation for territorial water upto 12 NM is straight intervention in small fishermen's Fundamental Right.</p> <p>The entire draft is going to violate the environment protection act 1986</p> <p>Its encouraging different industries, business like tourism that will create lot of restrictions on actual fishing.</p> <p>There are no provisions for fishing localities and allied activities on coastal land.</p>	<p>M.Thennarasan, Commissioner, Surat Municipal Corporation, Surat</p> <p>commissioner@suratmunicipal.org</p>	<p>449</p>	<p>CRZ should be applicable to the land area between HTL and the distance area falling within the jurisdiction of urban local bodies as prescribed in the general DCR.</p> <p>CRZ should not be applicable on the upstream side of the Weir or Barrage constructed across the water body.</p>	<p>450</p>	<p>Chairman, Mata Taka Devi Machhi, Vi. Ka. Sah Sosa, Marya, Mandve, Raigard, Maharashtra</p>	<p>Objection in draft CRZ notification.</p> <p>Marathi Language</p>
451	<p>Maharbhai M.Kakadia, Surat, Gujarat</p>	<p>I appreciate to initiate procedure to resolve the CRZ issue & make a clear path of development. Superimpose boundaries of T. P Schemes as well as boundaries of final plots in CRZ map.</p>	<p>Objection in Draft CRZ Notification</p>	<p>452</p>	<p>Democratic Traditional Fisher's Workers Forum</p>	<p>Andra Pradesh</p>			

	Mob. 8555809779 + 1499 representations	
453	West Bengal 8348927286 + 39 Representations	Comments in Regional Language
454	Yashodhan Wanage, Chairman Mumbai Port Trust, Mumbai 022-22615049 dychairman@mbptmail.com	<ul style="list-style-type: none"> • Because of peculiar picture of topography and geography of Mumbai, a 50-meter belt should be considered for CRZ in Mumbai city. • A scientific definition of tidally influenced bodies should be given. • Proposed ports and port related activities including coastal economic zone should be designated as CRZ-II. • Reclamation for green activities such as gardens, beaches, water sports, ropeway and transport etc. and coastal economic zone should be allowed in CRZ-I B. • Jetties and walks along water front should be treated at par with the existing road and development on landward side should be permitted in CRZ-II. • Coastal economic zone should be allowed in CRZ-III. • Port related activities should be exempted from obtaining clearances. • Tourism tents, restaurant, open sports activities should be allowed within 20 meter with temporary sheds in Islands and backwater Islands. • Planning Authority may be permitted to relocate open spaces, parks, gardens, playgrounds etc. indicated in the development planning, without change in total area within the CRZ.
455	National Old Community, Surat, Gujarat 9925019741	<ul style="list-style-type: none"> • National Od Community and Banjara Communities are customary/traditional sand mining and lime mining communities. These are poor communities and coastal areas of Gujarat and quarry lease of sand/lime mining may be granted to them.
456	Karle Properties, Builders & Developers, Sudarshan Karle, Bangalore, Karnataka 080-2347442	To permit construction of residential houses on the plotted developments, in the NDZ in CRZ II & CRZ III, where approvals for development of residential plots have already been granted by local authorities, prior to the first CRZ notification 19.02.1991.
457	Santosh Balkrushana Meher, Chairman Satpati Machhimar Vividh	Draft relaxes restriction on activities detrimental to coastal environment. Small and traditional coastal fishing communities were not consulted. Draft was published only in English.

458	M.L. Dharane, Deputy Secretary Government of Maharashtra Dokharland.wrd@maharashtra.gov.in 022-22793576	Exemption from CRZ clearance in respect of Kharland scheme in Maharashtra state. To repair/ reconstruction/ renovation of Kharland schemes if the alignment of the scheme passes through mangrove areas or is likely to damage the mangroves a minimum two times the mangroves area affected /destroyed / cut during the construction process shall be taken up for compensatory plantation of mangroves. Clause no. 5.1.2 CRZ IB- The inter tidal areas (f) Measures to prevent sand bars, installation of tidal regulators, laying of storm water drains or structures for prevention of salinity ingress such as Kharland development schemes (Constructed as per the Maharashtra Kharlands Development Act 1979) and fresh water recharge.	459	A. Gandimathi, General Secretary Coastal Action Network, Nagapattinam coastalactionnetwork@rediffmail.com 044-22251304	Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries. Comment in regional language	460	Address in regional language	461	President, Karaikalmedu Karakal, Tamilnadu + 22 Representations	462	Maharashtra Machimar Kruti Samitee, District Palghar, Maharashtra, 7045277475 + 352 Representations	463	Sri Bijay Das, Chairman, Hotel Association of Puri, Ananda Bhawan, Puri, In draft notification clause 5.2 (CRZ II) there should not be any legal controversy either by the Concerned local town planning authority or by SCZMA. In above clause there is ambiguity for constructing commercial buildings (hotels/beach resort or any
	Maryadit, Palghar, Maharashtra 8446487340	Draft does not mention that violations to earlier CRZ Notifications will continue to be booked under the As directed by NGT, CZMPs should have been finalised first. Draft should be rescinded and a comprehensive Coastal Regulation Zone Act must be enacted.			Objection in Draft CRZ 2018. Follow the CRZ 2011 and request for personal hearing for the welfare of fishing community. Permit the new fishing harbours/ports. Don't permit industrialisation in coastal areas.								

	Odisha 9437028900	other) within CRZII of developed land areas i.e within the existing municipal limits. FSI and FAR, prevailing as on the date of this notification is not clear.
464	Deputy Secretary, Mahim Retibandar Koliwada Gaaathan Rahiwasi Sangh, Mahim, Mumbai, Maharashtra 8355837502	Notification dilutes the protection afforded by earlier notification. Reduction in NDZ limit dilution of regulations and eliminations of hazard line effectively allows more activities in coastal stretches. Draft facilitates development, industrialisation and urbanisation by reducing environment protection. Draft gives specific relaxations to coastal tourism agenda of government compromising with the requirements of local communities. Draft promotes development without understanding of the fisheries.
465	J.P. Romalt Kaitan Coromandel Social Service Forum, 171, Victoria Street Thoothukudi, 9486984019 cssffuty@gmail.com	Draft has paved way for exploitation of the coast. Gulf of Mannar, a marine biosphere should fall under CRZ-I in total and not in CRZ-IV. CVCA status should be given to Gulf of Mannar Corals, fish breeding and fishing zone should be mapped.
466	Gopal Tandan, President, Bharatiya Janata Party, Daman & Diu Pradesh, Daman 0260-2251777	Owing to space limitations in Daman, only 9 to 10 Sq. Km. out of the 70 Sq. Km. is available for residential and economic activities because of CRZ regulations. Same situation exists in Diu District with 39 Sq. Km. area of tourism and industrial sector is happening on a fast pace and, therefore, Daman & Diu should be categorised as CRZ-II. The entire area falls under legally designated urban area.
467	Antus 8593825174 Kerala + 17 representations	Draft CRZ 2018, is more favarable for industries, ports, transport and tourism and safeguarding traditional livelihood's. This draft must be immediately dropped.
468	Mrs. Jyoti Rajesh Mehar Chairperson, Thane Zilha Macchimar Samaj Sangh, Palghar Secretary, National Fish Workers Forum Maharashtra Machimar Sahkari Sangh Ltd., Mumbai	CZMPs should have been framed earlier to the revision of the 2011 Notification. Draft Notification is more of industrialisation and urbanisation plan and not environment oriented planning tool. Favours tourism sustainable livelihood, favours industrial activities at the cost of ecology and biodiversity, endangers sustainable favours. Land reclamation should be totally prohibited. Any construction on beaches, No Development Zone and CRZ-I should be completely prohibited. No mining should be promoted
469	Alkali Manufacturers Association of India	The land area from HTL to 500 m on land ward side along the sea front is considered to be CRZ zone as per CRZ notification, 2011 and 2018 as well. This limit should be decided based on annual erosion rate

363

<p>of that area and should be granted to the industry based on their compliances to environment quality & environment management measures.</p>	<p>Vikas Marg, Delhi K. Srinivasan Secretary General Gujarat</p>	
<p>The land area from HTL to 500 m on land ward side along the sea front is considered to be CRZ zone as per CRZ notification, 2011 and 2018 as well. It has retained 500 m, the limit should be defined on "Risk based"</p>	<p>Western Gujarat Chamber of Industries N.N Radia, President</p>	470
<p>There are very few areas in CRZ-III with high density population. Standard NDZ of 50 meter should apply.</p>	<p>Nozer Wadia Associates Narendra Bhavan Annexe Warden Road, Mumbai admin@nozerwadia.com</p>	471
<p>There is tremendous scope of development of tourism industry, which shall ensure huge employment opportunity for rural communities. This will reduce mass migration to urban cities and ease the pressure on the infrastructure of already saturated cities. There is a mixed tourism and development potential in the coastline and should be exploited by like Dubai.</p>		