

To  
The Chairperson & Members  
National Board for Wildlife  
Govt. of India, New Delhi  
C/O  
Director of Wildlife Preservation & Member Secretary  
National Board for Wildlife  
&  
Additional Director General of Forests (Wildlife)  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhavan, Jorbagh Road,  
New Delhi - 110003

Dated, 12<sup>th</sup> Oct. 2019

Dear Sirs,

**Subject: Societal concerns over the approval given by the Karnataka state Wild Life Board for geo-technical investigation in Sharavathy Valley LTM Sanctuary, Karnataka to set up the largest pumped storage hydel plant in the country**

Greetings from Sagara, Western Ghats, Karnataka.

May I draw your kind attention to a decision taken in a meeting of Karnataka State Wildlife Board on 26.9.2019 to recommend permission to carry out the Survey and Geo-technical Investigation for the proposed Sharavathi Pumped Storage Project in Sharavathi Valley Lion-Tailed Macaque Sanctuary, Karnataka, to set up a 2,000 MW pumped storage hydel power plant, which may ultimately destroy about 360 acres of pristine forest of very high ecological value in a Wild Life sanctuary?

I would like to draw your kind attention to very many harsh realities to our state/country in this context, so as to enable the Union govt. to take diligent view of this disastrous project proposal.

### **1.0 Introduction**

Whereas people of the state felt very happy about a recent statement of the honorable CM asking the forest department to work towards creating green environment everywhere, and whereas the same has been a great news for the flora, fauna and general environment in the state, a question also has cropped up whether in reality the forest department will be allowed / encouraged to create a healthy green environment all around us. Will the prevailing political economy / environment in the state / country allow such a sustainable economic activity?

1.1 In this context, it may even appear to many people in our state that many of our political leaders, forest department officials, and bureaucrats will not rest until every sq. km of the forests in the state are destroyed, and until we can see only desert like landscape even in Malenadu and Karavali regions. Such people can be easily be forgiven, because the recent developments in the state may indicate such a scenario to them.

1.2 Few weeks ago the Environmental Clearance was given to divert more than 54 hectares of very high quality tropical rain forests in the core area of Western Ghats in Karnataka in the ESZ of Anshi National

Park along with the permission to use more than 6,600 Cubic meter per hour of water from the adjacent Kali river to install two more reactors in Kaiga Nuclear Power Project (Uttara Kannada district), and the same can be seen as the beginning of the end of both the national park as well as the adjacent Kali Tiger reserve.

1.3 There is another application pending before the environment ministry for diverting about 177 hectares of thick forest lands, again within the core Western Ghats of Karnataka, to build a power line between Karnataka and Goa (Project proposal no: FP/KA/TRANS/37754/2018; LILO of One Ckt of Narendra(Existing)- Narendra (New) 400kV D/C Quad Transmission Line). This project proposal is even more disturbing/ damning because it is sent to the Union environment ministry with a bold but ridiculous statement that the economic benefits to our country of constructing this line is 715 times as compared to the cost of destroying 177 Hectares of forests. This particular claim about the humongous benefits as compared to the overall cost of destroying the thick forest cover seems to be a clear indication of how our bureaucrats, both in the forest department and outside, view even the high quality natural forest with disgust/indifference/ignorance.

1.4 This scenario of losing thick and high value forests in the state for building one or more power transmission lines for the sake of a neighboring state is not entirely new for Karnataka. Few years ago the state was reported to have lost more than 50,000 trees in the district of Coorg to build a power line to Kerala. The state govt./union govt. must undertake very careful analysis of such scenarios to avoid cutting trees in the ecologically sensitive Western Ghats.

1.5 There are also media reports of more than 20 linear projects in various stages of planning and implementation within the core Western Ghats of Karnataka, with the definitive prospect of felling about 2 million mature trees. A diligent analysis of these projects will reveal that most of them are ill-conceived and hence not required, OR there are many benign alternatives to achieve the project objective/s.

1.6 It should also be highlighted that each of these project proposals may have many credible alternatives with much less societal costs, but the same have not been diligently looked into. Sadly and deplorably, the civil society views/ concerns / recommendations are never diligently considered with the result that a once rich biodiversity of our country is experiencing alarming levels of degradation with devastating and irreversible damages.

What can the people of this country say about the continuing approval formalities to scores of such destructive projects even in National Parks and Wildlife Sanctuaries at a time when the tropical forests in India are considered as one of the most effective and cheapest options to minimise the GHG emissions?

## **2.0 Ecological impacts/concerns of the proposed project**

When we holistically consider the different aspects of this project proposal (as described in the pre-feasibility report) even at a high level, it becomes clear that the concerned authorities in the forest/energy department/KPCL have not briefed the State Wild Life Board and/or the honorable CM on the vastly negative impacts of the project to the state as a whole. On the basis of the pre-feasibility report, it can be credibly stated that the overall cost to our state / country /planet will be very many times more as compared to the meager benefits.

2.1 The efficacy of the project proposal from the perspective of the wildlife is best considered in the context of the biodiversity scenario in the state/country and also in the context of Climate Change. The National parks and Wildlife Sanctuaries, having been recognized as the critical part of the nature in combating the Climate Change, is reported to constitute a mere 4% of India's land area and about 5.6% of Karnataka state's land area, wherein intact assemblages of several endangered species have the best chance of long term survival in the wild.

2.2 Sharavathi Valley Lion-Tailed Macaque Sanctuary is known as one of the largest protected area of tropical evergreen forest in the fragile Western Ghats. The Western Ghats, of which the Sharavathi Valley Lion-Tailed Macaque Sanctuary is a critical part, is also assessed to be one of the eight hottest of the hotspots for bio-diversity conservation in the world. Whereas the habitat fragmentation is one of the biggest threats to the survival of several endangered species and Sharavathi valley is one of the last compact tracts of climax evergreen forest remaining in the Western Ghats, the proposed project will lead to such a fragmentation thereby destroying the associated rich biodiversity forever.

2.3 The Sharavathy river valley is home to a diverse array of species and sustains a very rich biodiversity, some of which are still unknown to the outer world. Most importantly it is home to endangered and endemic Lion-Tailed Macaque and vulnerable Great Indian Hornbill apart from many other endangered species. It is also a vital wildlife corridor that connects the Gerusoppa - Kyadagi region to the north and Govardhanagiri - Jog State Forest to the south. The sanctuary is a declared conservation priority area for the long term survival of Lion-Tailed Macaque as it harbours the northernmost and a viable population of these endemic macaques in the whole of Western Ghats.

2.4 The entire area of proposed project site falls inside the Sharavathi Valley Lion-Tailed Macaque Sanctuary. This river valley is home to pristine tropical evergreen forests that are still untouched by any kind of anthropogenic activities. Wildlife Protection Act clearly prohibits any kind of destruction of wildlife including its habitat inside a wildlife sanctuary unless the destruction is for the betterment of wildlife and its habitat. None of the objectives of the proposed project can even be linked to the betterment of wildlife and its habitat. On the contrary, there will be various activities under the proposed project which will destroy many of the wildlife and its habitat.

2.5 A number of major civil works are proposed for this project, and all these are reported to be falling in the core area of the Sharavathy LTM Sanctuary:

- Ø 2 \*2.726 km long, 9 m diameter circular concrete lined headrace tunnels including cut & cover works
- Ø 2\*0.828 km long, 5.25m diameter inclined circular steel lined (including horizontal) pressure shafts
- Ø 2\* 16m dia circular Surge Shafts 52m high.
- Ø An underground power house having an installation of 8 Francis type reversible pump-turbine driven generating units of 250MW capacity each
- Ø 2\* 3.780 km & 3.830 km long concrete lined tail race tunnels to carry the power house releases to lower reservoir.
- Ø 2\* 60 km of 400 kV Double circuit transmission line from the proposed power house to Talaguppa Sub-station.

2.6 These works must be in addition to many service roads, shelters for construction and maintenance purposes, and staff quarters. The construction related activities of all these civil structure will involve the destruction of forests and earth works leading to decimation of the rich biodiversity in this wild life

sanctuary. Lot of noise, dust and contamination of the Sharavathy river and other streams in the area can be stated to be the major disturbances of the project.

2.7 Since the site of the proposed plant requires about 360 acres of pristine forest land within the core of the recently notified Sharavathy Valley LTM Wild Life sanctuary, the very idea of this plant should be diligently considered. The enormity of the potential loss of very rich biodiversity over more than 360 acres of a Wild Life sanctuary at a time when the forest and tree cover in the state is only about 20% as against the national forest policy target of 33%, and at a time when such rich tropical forests land is considered as a highly effective tool against the global warming, should be considered against the meager benefits from the proposed project which can be obtained from other sources too.

2.8 The irreversible destruction of about 360 acres of pristine rain forest in the Sharavathi river valley, which is a crucial catchment area of river Sharavathi, could permanently harm the pattern of local rains and river flow, and can substantially reduce the water availability to the multiple hydel projects which are already functioning in the river valley. Over a period of time such reduced water flow in the river flow can endanger the very feasibility of the project.

2.8 The project can be of relevance to the state for only 4 to 8 hours in a day, that too during only peak hours to meet the additional load. When we diligently consider the overall electricity scenario in the state, it becomes evident that the project is not essential, and that it will cost much more to the state than the meager benefit it can provide.

2.9 The Gazette notification no. 3956 of 3rd October, 2018 (as applicable to MoEF&CC) proposing to implement the recommendations of the High Level Working Group (also generally referred to as Kasturi Rangan Committee) has notified the identified an area of 56,825 square kilometre which is spread across six WG's states as the Western Ghats Ecologically Sensitive Area. As per Annexure C, (Page 162) of this Gazette notification, many villages (in Sagar taluk of Shimoga, and Siddapura and Honnavara taluk of Uttara Kannada district) falling within the LTM Sanctuary are declared as ecologically sensitive areas to be completely protected. Hence, the question of environmental clearance for this project should not be entertained at all.

2.10 The gazette notification on the creation of "Sharavathi Valley LTM (Lion-Tailed Macaque) Sanctuary" (NO: FEE 12 FWL 2019, BENGALURU) has copiously described the biodiversity richness of the river valley and its importance. It says;

∅ " .. has better wildlife habitat and it is corridor for wildlife movements and the areas have adequate ecological, faunal, floral, geomorphological, natural and zoological significance for the purpose of protecting, propagating and developing Wildlife and its environment therein and to protect the important habitats like fresh water Myristica swamps with species like Myristica fatua, Gymnacranthera canarica, Semecarpus kathlekanensis, Dipterocarpus indicus, Macaca silenus (Lion-tailed macaque), Buceros bicornis (Great Indian Hornbill) and other Endangered Flora and Fauna.

∅ The landscape is covered by Climax Tropical Evergreen Forests interspersed with Savanna Grasslands. These forests are extremely rich in arboreal fauna and avifauna, due to their canopy contiguity and availability of a variety of seasonal fruit-bearing trees.

∅ The most conspicuous of the arboreal mammal present in this landscape is Lion-Tailed Macaque, LTM (Macaca silenus). Lion-Tailed Macaques are confined to the evergreen forests of the Western Ghats. The northernmost population of Lion-tailed Macaque is known from the forests of Sirsi and Honnavara divisions in Uttara Kannada district of Karnataka.

- ∅ Because of the unique features these forests deserve to be defined as “Ecologically Sensitive Area”. The list of flora and fauna of the area suggests that the forests are ecologically ‘Rich’, ‘Valuable’, ‘Unique’ and ‘irreplaceable’ if destroyed.
- ∅ Further, by virtue of biological richness, they are potentially of high value to human societies, help in maintaining the ecological stability and significant in conserving biological diversity.
- ∅ These forests provide better habitat for the wild animals including Tiger, Elephant, Leopard, Indian Gaur, Sloth Bear, Wild Boar, Porcupine, Jackal, Indian Fox, Black-naped Hare, Dhole, Barking Deer etc., have been given highest protection under schedule-1 of the Wildlife (Protection) Act, 1972 and these species are facing increasing threats from various corners hence, extending the Sanctuary is essential.
- ∅ These Reserved Forest areas have rich natural forest covers which are an integral part of the central Western Ghats which is a part of Global Biodiversity Hotspot.

2.11 Having said all these superlatives about the rich biodiversity of the LTM Sanctuary, the state and Union govt. must not be seen as violating their own mandate to protect the sanctity of a Wildlife sanctuary for the sake of a project proposal, which can only cause enormous harm to the biodiversity of the sanctuary, and when it is also clearly known that the stated objective of this project can be met through much benign options.

2.12 A critical example of the potential for devastation of the wild life from the proposed project can be cited as the serious threat to the fish species ‘Deccan Mahseer’ as in the news link below.

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**Sharavathi project could sink Deccan Mahseer**

<https://www.deccanherald.com/state/sharavathi-project-could-sink-deccan-mahseer-766734.html>  
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Keeping all these eco-sensitive issues in proper consideration, it is shocking that the state Wild Life Board has given a go ahead for the preliminary investigation to the project in the core area of the sanctuary. The state Wild Life Board is expected to diligently consider the true relevance of the proposed project (which will be of use for only about 20% of the time in a year) in the backdrop of many such ecological concerns, at a time when the country and the whole planet is experiencing climate emergency. But sadly, it appears that the same was not done, and because of such a failure the Sharavathy Valley LTM Wild Life sanctuary is now staring at the threat of witnessing the destruction of more than 360 acres of rich bio-diversity in its core area.

Similarly, a diligent view of the techno-economic aspects of the project proposal will also establish that the overall cost of the proposal to the society is vastly more than the meager benefits from it, and that there are suitable alternative options of much lower overall societal cost and without having to destroy the rich bio-diversity of the sanctuary.

**3.0 Techno-economic feasibility of the proposed project**

Since the proposed project has the single aim of bridging the gap between electricity demand and supply during the peak demand hours in the state, it is critical that all the associated issues of the power sector in the state are diligently analysed to determine whether the proposed project is essential and whether suitable alternatives exist. It will be in the long term interest of our society to ask the concerned authorities (state energy department and the KPCL) to provide credible clarification on the following issues.

3.1 A pumped storage power plant is meant to generate additional power required to meet electricity demand for the peak hours of the day only (about 2 hours early in the morning and/or 2 hours in the evening); it is supposed to utilise any surplus electricity in the state during the night off-peak hours to pump water from a lower reservoir to the higher level reservoir. So, in reality a pumped storage hydel plant is meant only to meet the peak hour shortage in the state, and hence will be in operation for only about 20% of the time. As compared to a typical hydel power plant which is designed to operate for more than 60% of the time, can we consider such a power plant as worthy of its huge ecological costs to the society?

3.2 Also, it is well known that a pumped storage power plant will consume about 25% more electricity in pumping water from the lower reservoir to the upper reservoir as compared to the electricity it can generate from the same volume of water. As per the pre-feasibility report this proposal, the 2,000 MW capacity power project is estimated to generate about 12,000 MWH per year of electricity, whereas about 14,833 MWH of energy is estimated to be consumed in the process of pumping water from the lower reservoir to the upper reservoir. In effect, this proposed pumped storage power plant scheme will consume about 24% more energy from the grid than it can generate in a year. Will such a scenario be in the true interest of the state, when it has been known that the state is facing chronic annual energy shortage for many decades?

3.3 As per the official report (24\*7 Power for all (Karnataka) by Energy Department) between FY 2010-11 and 2014-15, the recorded annual electrical energy **shortage** ranged between 4% and 14%. The power shortage during the peak hours during this period was between 5% and 19%. The maximum demand met by the state has increased from 7,815 MW in FY 2011 to 9,549 MW in FY 2015 showing a growth of 22% during the 4 year period, while energy requirement has increased by 29% during the same period. This statistical information has meant an annual growth in max. demand and annual energy of about 5 to 7%. Such a high growth if allowed to be continued can result in doubling of these parameters in about 8 - 10 years. Whereas the legitimate growth in the annual energy can be catered to thorough the addition of solar PV panels at a low cost, can the state afford to build many more of pumped storage hydel plants just to meet the peak hour power shortage?

3.4 For the period April 2019 to August 2019 the peak power demand in the state was 12,700 MW and the deficit was only 12 MW. As compared to the peak power demand of 7,815 MW in FY2011, the increase in peak power demand is about 62% in 8 years, and about 6- 8% per year on an average. The question that needs to be answered in this context is whether the state can afford such vast increase in peak hour power demand, for which many more pumped storage hydel plants may have to be constructed at enormous cost to the state. A diligent analysis of various associated issues in this regard will reveal the criticality for the state to apply necessary course corrections to limit the increase in its peak hour power demand to a manageable level, and also to find suitable alternatives to meet such an increase.

3.5 The prefeasibility report has wrongly referred to the peak power demand/supply of the entire southern region to substantiate the need for this project. The management of peak power demand of any state should be primarily the responsibility of that state, and hence Karnataka has to concern itself with satisfactorily managing its peak hour demand through its own sources. Also, it should not destroy its precious biodiversity to compensate for the inability of other states to manage their power demand.

3.6 In this context, it should be mentioned that Karnataka has lost more than 50,000 Trees in the district of Coorg few years ago to build a power line to Kerala, and is set to lose another 177 hectares of thick

forest land in the Western Ghats area of Dharwad, Uttara Kannada and Belgaum districts to build another power line to Goa. In this regard a high level analysis of all the associated issues can reveal that there have been much benign options other than building these power lines through Western Ghats, but sadly both the state and union govt. did not exercise due diligence in the associated approval process. Such irrational projects for the sake of other states through our natural forest must be avoided when there are other suitable options.

3.7 Whereas a pumped storage power plant scheme is planned on the basis that there will be excess electricity during the late night hours (say between 10.00 PM and 05.00 AM), Karnataka may not have excess electricity in the night during all months of the year. It may certainly not have surplus during the summer months, say between Feb. and June.

Hence, the project proposal can be said to be fundamentally flawed from the perspective of technical suitability

#### **4.0 Better alternatives of much less societal cost**

The very need for the project can be questioned because of many technical reasons as applicable to the state of Karnataka. The state energy department and the project proponent should be asked to justify the very need for the project in the context of the following issues. The enormous costs to the society/state/country of the proposed project should have made it mandatory for the forest department to ensure that all the other options have been diligently studied before considering this project proposal.

4.1 There are many benign options available to bridge the gap in demand/supply of electricity during the peak demand hours in the state. None of these options, which can be implemented without cutting any tree or without harming any biodiversity, seem to have been considered.

4.2 It must be a prudent economic decision making process to objectively consider each credible option from the perspective of costs/benefits to the state, and compared the same with this project proposal. Hence, the very need for the project can be credibly questioned because of many of the simpler options available to the state.

4.3 The peak demand of the state can be reduced by considerable margins by making the lighting systems in the state, including that of the street lights and public lighting, very efficient and optimal too for the purpose for which they are installed. A survey conducted by a group of engineering college students, as part of their final year project course, has indicated that in the city of Mysore, the illumination level at most of the locations where street lights have been installed, are 2 to 2.5 times more than that required as per BIS. The same should hold good for other towns/cities too. A diligent application of the principles of illumination engineering and the deployment of the most efficient and suitable lighting fixtures can bring down the streetlight load, which is a predominant part of the peak hour power demand.

4.4 The lighting systems of all parks and many public places such as bus-stands, railway stations, commercial complexes, museums, large commercial buildings, industries, educational institutions, office buildings, air ports, cinemas, highways, airports, sports stadiums, libraries etc. can be made independent of the grid by powering them through solar battery systems. Such a system can drastically reduce the peak hour demand on the state/national grid. If necessary, suitable financial/commercial incentives should be considered to set up such systems.

4.5 Another option is to make use of the vast solar/wind power potential in the state/country to generate excess electricity during the day time and make use of the same during peak hours through suitable energy storage devices such as utility scale batteries, which is already in vogue in many parts of the world.

4.6 Reducing the transmission & distribution (T&D) losses in the state from the present level of about 18% to about 8%, which is feasible, sustainable and most economical, can also reduce the peak hour power demand on the grid. It is a sad reflection on part of the state energy department that the T&D losses have remained very high, as compared to the international best practice of about 5%, though the critical need to reduce the same has been highlighted since more than three decades, including that in the National Electricity Policy of 2005.

4.7 Have there been any concerted efforts on part of the state energy department and the associated companies to contain/reduce the peak hour power demand to the optimal level? In view of the fact that it costs very heavily for the state/society to build additional power plants only to meet the peak hour power demand, should there not be effective measures to reduce the peak demand itself?

4.8 Are there efforts to have agreements with major industrial/commercial consumers in different parts of the state to reduce their peak hour demand in exchange for certain financial incentives or tax benefits? If not done so far, should it not be considered urgently?

4.9 Can there be commercial agreements with private/public power companies either within the state or outside the state to supply such additional power during peak hour demand? Such agreements, along with adequate measures to reduce the peak hour demand, will be lot more economical than to build additional peak power plants.

4.10 With the help of modern digital metering system, it is feasible to measure how much energy/power is consumed in every block of 15 minutes or even continuously. Should this facility not be made use of to contain the peak hour demand through suitable peak hour tariff for electricity supply?

4.11 Through a sophisticated software algorithms it is known to be feasible to harness the potential of thousands of smart appliances to respond when the power supply system is under stress; either during the peak hour period or any other period. These devices will automatically use electricity when there is ample renewable energy on the grid, and then reduce or switch off their energy use when the grid needs help to steady the energy system. Such schemes are already known to have begun pooling the energy potential of supermarket freezers and electric vehicle batteries, but this scheme can also be used in case of home devices.

4.12 One of the simplest measure in the context of demand side management (DSM) is to make repeated appeal over the print and electronic media requesting the electricity consumers, state wide, to minimize/avoid the usage of certain electrical appliances, such as electric iron, washing machines, electric geysers, electric stoves/ovens, water pumps etc. during such peak hour periods.

4.13 In view of the enormous cost to the society/state of setting up power plants to cater to only the peak hour demand, it is logistically/economically viable to implement as many such measures as feasible to reduce the peak hour demand on the power grid itself. Such an approach is already being deployed



in developed countries, and hence they must be diligently examined for implementation in the state too.

4.14 It is a moot point whether the proposal has been sent to the highest levels of the Union govt. for concurrence without due diligence expected from various authorities within the state govt. of Karnataka for a proposal which has the potential to decimate about 360 acres of thick forest in a Wildlife sanctuary. It should also be a matter of great concern to the people of the state that the energy department in Karnataka, along with its subordinate bodies, has been conjuring up many such high impact project proposals without due consideration to the forests and biodiversity, and without a rational approach to the suitable alternative options to achieve the same objective. In this context many examples of lack of due diligence on part of the Karnataka's energy department can be cited.

Hence, there is a serious case for the people of the state to credibly challenge the state energy department and forest department with the very concept of the proposed project, when it is well known that the associated total costs to the state are very high as compared to the meager benefits, and that there are much better alternatives. It will not be a surprise if a massive agitation is seen very soon in the districts falling within the Western Ghats to oppose this and many other destructive projects. Let us hope that the wisdom will prevail on the state govt. and the project proposal will be stopped for all times to come.

## **5.0 National and global perspectives**

At a time when the planet is staring at Climate Emergency, and when protecting the tropical forests and biodiversity is being considered as critical in reducing the impacts of Climate Change, losing the rich biodiversity of a Wildlife sanctuary for a low priority (or may even be termed as irrelevant) hydel power plant can only be termed as a disastrous and insensitive policy, especially when there are many better options in place of such a hydel power plant.

5.1 As per the sections 48 (a) and 51 (a) (g) of our Constitution it is the duty of the STATE and every citizen to make honest efforts to protect and improve our environment by protecting and improving rivers, lakes, forests and living beings. The ongoing practice of diverting massive chunks of forest lands, even in Wildlife sanctuaries as in the present case, and as mentioned in section 1 above, cannot be in compliance of this Constitutional mandate, and the letter and spirit of Environmental Protection Act, the Forest Conservation Act and the Wild Life Protection Act. In almost all such cases of forest diversion and biodiversity destruction, the state and Union govt. can be seen as being primarily responsible.

5.2. A clear conviction of IPCC w.r.t the forests is represented by two associated statements: "Emissions from deforestation are very significant – they are estimated to represent more than 18% of global emissions", "Curbing deforestation is a highly cost-effective way of reducing greenhouse gas emissions." In the context of the calamitous impacts of Climate Change, it may be considered as a crime against the human kind that India, which has only about 21% of its land under forests and tree cover, should continue to divert very high quality forests even within National Parks/Wild life Sanctuaries for projects whose necessity can be clearly challenged, and for which there are many benign alternatives.

5.3. It is an irony, and can even be termed as cruel joke, that whereas the honorable PM has announced that India would raise its ambition of the total area that would be restored from its land degradation status, from 21 million hectares to 26 million hectares between now and 2030, thousands of hectares of

original forest lands are being destroyed in the name of various developmental projects. It should be highlighted in this context that losing the rich natural forest is the first step in desertification of our land.

5.4. The continuing loss of original forest cover in the country should be an enormous concern for the long term welfare of our communities. When we also realize that as per media reports, Karnataka has lost about 10,000 hectares of forest in a 3 year period recently, and that for the country as a whole, the loss of primary forest in the last five years was more than 120,000 ha, which is nearly 36% more than such losses seen between 2009 and 2013, the enormity of the situation for the biodiversity of the country, and the failure of the associated policies of the govt. should become amply clear.

5.5. It may not sound too harsh to state that unless urgent and effective actions are taken to address all these associated issues, the present regimes at the state and the centre may go down in the history as the root cause of all the ecological and associated calamities which will devastate our communities in the very near future. People will forget how the previous governments have failed on similar counts, because the abuse of nature has escalated during the last 4-5 years and various credible international reports warning the global communities on the looming ecological and associated calamities also have come out during this period. Additionally, a number of CSOs and individuals have been coming up with various warning and advises for the Union govt. in the same period to stop the ever escalating abuse of the nature, and to move over to a sustainable future.

5.6 At a time when the govt. of India is seeking to assume a leadership role in the global efforts to address the threats of Climate Change, it is completely against such a spirit to continue to divert thick natural forest even in a Wildlife sanctuary. Hence, the onus is on the Union govt. to either to get the honor as a savior of our future OR the tag of the destroyer of the future.

## **6.0 Summary**

Keeping all the relevant issues of the state of Karnataka in objective consideration, it must be stated that it will be vastly harmful to the long term interest of the state/country to destroy about 360 acres of pristine evergreen forest of very high ecological value in a Wildlife sanctuary for a pumped storage project which will cost vastly more to the society than the meager benefits, and for which there are many benign and more attractive options.

Section 29 of the Wildlife Protection Act clearly prohibits any kind of destruction of wildlife including its habitat inside a wildlife sanctuary unless the destruction is unambiguously for the betterment of wildlife and its habitat. The arguments as above should amply prove that the proposed power plant would certainly not benefit Wildlife or its habitat, but will only destroy a considerable portion of that habitat. This project will, hence, be a clear violation of Wildlife Protection Act, 1972.

The proposed pumped storage hydel power project is not essential for the demand/supply of power in the state of Karnataka, and it is not sustainable or green in nature. Since there are much less costly options to meet the peak hour electricity demand, the costs and benefits analysis of this proposal will establish beyond doubts that it is the least attractive option.

Based on the above presented facts and reasons, I urge you not to grant the permission to carry out even the Survey and Geo-technical Investigation for the proposed Sharavathi Pumped Storage Project in Sharavathi Valley Lion-Tailed Macaque Sanctuary, Karnataka, and also to ask the project proponent to abandon the project proposal permanently.

The state govt. of Karnataka may also please be asked to carefully deliberate on all the associated issues before such destructive project proposals in Wildlife Sanctuaries and National Parks are sent to the National Board for Wildlife for concurrence.

Regards

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