To,

Shri Prakash Javadekar,
Hon’ble minister Environment, Forests & Climate Change,
Member Secretary, Standing Committee,
National Board for Wildlife
Indira Pariyavaran Bhawan,
Jorbagh road, Delhi - 110 003

CC: Members of Standing Committee, NBWL

Subject: Appeal to reject the proposed Hubballi-Ankola Railway Line Project (HARP)

We write to you as concerned citizens of India imploring you to reject the ecologically disastrous Hubballi-Ankola Railway line Project (HARP). Recognizing it’s detrimental impacts, HARP has been rejected multiple times by various statutory government bodies over the last 22 years. Approximately 70% of the 165 km railway line will cut across the Western Ghats (WG), passing through Bedthi Conservation Reserve, close to Dandeli Hornbill Conservation Reserve and the buffer zone of Kali Tiger Reserve, all of which lie in Uttara Kannada (UK) district. HARP would require diversion of 595.64 ha of forest land, 76.64% of which lies in UK.

**UK District has a long history of forest loss:** In addition to being a UNESCO World Heritage site, the Western Ghats (WG) is among the 10 ‘hottest’ global biodiversity hotspots. Several species of flora and fauna found here are found nowhere else in the world. Yet, in the last century, WG have lost 33,000 sq km of forest. Alarmingly, nearly 10% (3,300 sq km) of this forest loss has occurred in UK alone! Given this history of massive forest loss, additional deforestation for HARP will result in devastating ecological impacts in UK. The negative impacts of HARP will be magnified given the intensity of human- induced change the region has already witnessed.

**Ecological impacts of HARP:** UK’s forests have been repeatedly punctured by mines, dams, roads, railway lines, power projects and a naval base. HARP will further fragment forests, which can disrupt water cycles, decimate populations of globally unique flora and fauna, increase human-wildlife conflict, and increase the risk of zoonotic diseases. While discussing all the negative consequences is beyond the scope of this document, we highlight a few critical ones.

Implementing the proposed project in the biodiverse WG region will directly impact many plant and animal communities. Losing large, slow-growing hardwood trees will lead to loss of stored carbon and decrease carbon storage potential of the forest. Losing trees will also harm a host of dependent species. For example, projects like HARP will drastically reduce feeding, resting and nesting sites for keystone species such as the Great Pied and Malabar Pied Hornbills. The railway line will also increase opportunities for fast-growing weeds and invasive species (e.g. Lantana) to thrive, which can further harm native tree species.

HARP cuts through a critical wildlife corridor utilized by Endangered Asiatic elephants and Bengal tigers. The railway track will reduce habitat suitability for these wide-ranging species while increasing mortality from collisions; serious concerns for species that already occur at low densities. For less mobile organisms like amphibians and reptiles, the railway line will impede movement resulting in the loss of gene flow, and alter feeding and breeding habitats. This is a serious concern because >90% of amphibians found in the WG occur nowhere else on Earth.

In addition to being treasure troves of diversity, these forests also provide essential ecological services that are critical for human wellbeing, such as climate regulation, recycling freshwater, pollination and soil stability. These services
decrease in fragmented and disturbed forests compared to primary forests. For example, natural ‘interior’ forests can store 40% more carbon compared to disturbed ‘edge forests’. HARP involves felling nearly 2 lakh trees, slope-cutting, blasting, muck-dumping, tunnelling and stream diversions. Together, such destructive activities will reduce large forest patches to small degraded ones, negatively influencing forest and river health, leading to the loss of critical ecological services valued at ₹ 298 crore/year.

Destroying natural habitats also harms human lives. Devastating landslides due to deforestation and construction have already been recorded from UK in 2009, 2010 and 2018. Further, losing biodiverse natural habitats in areas with high local human densities can increase risk from zoonotic diseases. Kyasanur Forest Disease has already spread to UK from its origins in Shivamogga, and HARP can increase its incidence. HARP will also increase contact with and thus conflict between people and large wildlife such as elephants, resulting in huge losses on both sides.

**Ecological damage cannot be mitigated:** The Environmental Impact Assessment (EIA) report clearly states that ecological damage caused by HARP is irreversible. Notwithstanding this assessment, the report contradicts itself through an Environmental Management Plan (EMP) that lists mitigation measures lacking in scientific merit, irrelevant to actual impacts and impractical to implement. Despite the well-known fact that forests of WG have evolved from complex interactions between thousands of organisms over millions of years, ‘compensatory afforestation’ has been proposed to mitigate forest loss. Merely planting trees in a new area will not compensate for the loss of complex ecosystems. The EIA and EMP also underestimates the forest loss. It fails to include forest loss from other project related activities such as building access roads for vehicles, power lines, and workers’ settlements.

Overall, mitigation measures fail to address the actual damage to wildlife, both direct (animals killed during construction, operation of the railway line and loss of suitable habitat) and indirect (increased poaching and retaliatory killing). Proposed measures like patrolling to prevent collisions between trains and wild animals, construction of over and under passes, and imposition of speed limits have been unsuccessful in other places. Other measures are simply frivolous and irrelevant. For example, the suggestion to identify and protect hornbill nest trees until chicks leave assumes that sensitive species will continue to nest in areas where dynamiting, felling and other activities will occur. This goes against the known biology of hornbills.

The railway line will pass through regions that experience high rainfall seasonally when the risk from landslides due to soil erosion is extremely high. The proposed railway-line also runs close to 287 streams that will be affected by sedimentation and contamination during construction and operation of the railway line. But, the mitigation measures proposed to counter these impacts are both illogical and unscientific. They fail to recognize that restoring vegetation will take decades, and mere tree planting will not counter soil erosion and landslides, and construction of bridges will not prevent water pollution!

Construction activities and operation of the railway line will result in large scale environmental pollution: air pollution from dust and emissions, noise pollution from blasting, soil and water contamination from waste accumulation, oil leakages and leaching of chemicals. Instead of addressing these major forms of pollution, the EMP focuses on mitigating waste generated by passenger trains plying along this freight only route!

Importantly, we note that the Indian Institute of Science (IISc) is not accredited to conduct EIAs yet the Government of Karnataka (GoK) assigned them this study. Further, a lead author of the EIA alleged “coercion” by GoK to write a favourable report. In spite of such gross procedural violations that invalidate the study, the project proponents continue to cite the report and the unscientific EMP to justify this ecologically disastrous project.
**Conclusion:** Ecological impacts from HARP are massive, detrimental and cannot be mitigated. Strong arguments can be made against HARP from the socio-economic perspective as well.

1) HARP was meant to transport iron ore from Bellary-Hospet to ports in Uttara Kannada for export. However, the Supreme Court banned export of iron ore from Karnataka. Also, mining in the area is expected to become economically unviable in two decades. Thus, there is no justification for approving HARP.

2) HARP was originally proposed for freight services but now justification for passenger services are being presented. However, the existing Hubballi-Ankola road and the underutilized Castle rock railway line are able to effectively meet existing demands. Thus, the proposed line is redundant.

3) The project will also drain the exchequer, which we cannot afford given the precarious financial situation of Indian Railways and the country's economic downturn due to the ongoing COVID-19 pandemic.

The benefits from HARP are insignificant when compared to its adverse ecological impacts on the landscape and its people. Preserving intact forest ecosystems is the best approach to mitigate the ecological crises we face today: droughts, landslides, water scarcity, zoonotic diseases, global warming, etc. In light of overwhelming scientific evidence, we hope that you will agree with the decision made by many experts to categorically reject the ill-conceived project.

Yours sincerely,
Concerned citizens of India
ಅಾದ ಕಂಡುಬರುವ ಸಂಾೂೕತಕಮದು ಅಪಾತಗಳ ಹುಬ ಅಂೂೕಾ ಲಂಾನ (ಲಾಗದ ಲವ ಅಂೂೕಾ ಹುಬ ಅರಣಾಶದ ಉತರ ಪೕಶದ ಉತರಕನಡ ಕನಡ ಪಾತ, ಮುಖಾದ ಕನಡ ಾಗದು ಏರುೕರು). ಇಾಸದೂ ಮತು ಮತಷು ಈಾಗೕ ಮತು ಈಗಳ ಬರುತ ಮತ್ತು ಬರುತ ಮತಷು ಪಸರದ ಜಲಚಕದ ಈಗಳ, ಹುಬ ಅಂೂೕಾ ಪಮುಖ, ಇಾಕಷು ಪಮುಖಾ ಆಾಸ, ಪಮುಖದ ಭಷದ 10 ಸಂಪಸುವ ರಷು, ಪಾಮಗಳಂತಹ ಎಾ ಪಾಮಗಳ, ಅಗತಾದ ಪಸುತ ಎಾನವನು ಮತ್ತು ಬಲು ಆಾಸಗಳನು ಎಾ ಪಾಮಗಳ, ಅಂನ ಗಂೕರಾದ ಅನುಕೂಲಗಳನೂ ಅನುಕೂಲಗಳನೂ ಅನುಕೂಲಗಳನೂ ಅನುಕೂಲಗಳನೂ. ಇದು ಪಾಮಗಳ ಅತ್ತಿ ಅಂೂೕಾ ಅವಗಳ ವಂಶಾಗಳ ಅವಗಳ ಇದು. ಅವಗಳ ಅವಗಳ ಅವಗಳ ಅವಗಳ.
ಅಂದು ವಿಲುಪ್ಪುತ್ತಿತ್ತುವ ಸುತ್ತದ ಬಣ್ಣವಾದ ಸಂಶೋಧನೆ. ಈ ಸಂಶೋಧನೆಯಲ್ಲಿ ಬಣ್ಣವಾದ ಕವನಕಾರಾನ ಕಡೆಗಿಡೆಂದರೆ, ಸಂಶೋಧನೆಯ ಅಭಿಪ್ರಾಯದ ಸಂಪೂರ್ಣ ಕಾರಣಗಳು ಅನುವುದಾರವಾಗಿರುವುದು. ಇತರ ಕಾರಣಗಳು ಸುಮಾರು 40 ಜನ್ಮದ ಕಾಲ ಸಂಶೋಧನೆಗಳಿಗೆ ಸಂಬಂಧಿಸಿದ್ದವು. ಮತ್ತೇನೆ ಕೆಲವು ಬಣ್ಣವಾದ ಸಂಶೋಧನೆಗಳು ಈಗಿಂತಲೂ ವಿಷಯವಾಗಿ ಕಾರಣಗಳು ಅರಣವನು ಮತ್ತು ಉಾರುವ ಅನುವುದಾರವಾಗಿದ್ದವು. ಕಡೆಗಿಡೆಂದ ಸಂಶೋಧನೆಯ ಕಾರಣಗಳು ಸಂಶೋಧನೆಯ ಅಭಿಪ್ರಾಯದ ಸಂಪೂರ್ಣ ಕಾರಣಗಳು ಅನುವುದಾರವಾಗಿರುವುದು. ಇತರ ಕಾರಣಗಳು ಸುಮಾರು 298 ಜನ್ಮದ ಕಾಲಕ್ಕೆ ಕಾರಣಗಳು ಅನುವುದಾರವಾಗಿದ್ದವು.

ಮರಗಳನು ಡುವದಂದು ಮನಸವಸೂಕ್ತ, ಭೂಕುತಯಾಧಾಲ ಮತು ಕಟುವದಂದು ಜಲಾನವನು ತಗಟಲು ಇಲ್ಲಿ! ಮತು ಸುಂದರಾಳ ಪಾಣದನುಂಟುಳು ಪಾಸಾಗಾಣವನುಂಟುಳು.

ಧೂಳಮತು ಒಂದು ಮಾರ್ಗವಾಗಿದ್ದರೆ, ತಮ್ಮವರ ವಿಭಾಗವು ಅನುಕೂಲಕರ ವರತಾಯಿತು. ಆದರೂ ಸಹಕಾರಕು ಸರಕುಎಂದರೆ ಹಲವು ನೂನಗಳನು ಒಳೂಂದರೂ ಕೂಡ ಎಂದು ಆಧುನಿಕವಾದರು.

1) ಹುಬ-ಅಂಬಾ ಸುಂದರ ಪುತ್ತಲು ಈಗ ಈಭಟ್ಟಿಗಾದಾಗ ಸಮಕಾಲಿನ ಅಥವಾ ಶ್ರವಣದ ದಶಕಗಳ ಗಾಂಭೀರ್ಯ ಪಸುತ್ತೆಯ ಆರೂರುಗಳಿಗೆ ಅವನು ಪುರಿಸಲು ಸಮಾಧಾನ ಪಡೆಯುವುದು. ಆದರೂ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ವಾಸ್ತವವಾಗಿ ನಿರ್ದೇಶಿಸಲು ಕಲಿನಾಯಕರ ಹಂತ ತಲುಪತು.

2) ಹುಬ-ಅಂಬಾ ಸುಂದರ ಪುತ್ತಿಂದ ಹುಬ-ಅಂಬಾ ಸುಂದರ ಡುವದಂದು ಮನಸವಸೂಕ್ತವಾಗಲೆಸು. ಇದು ಹುಬ ಸಾರಕುಈಗಲಾಗಿದ್ದರು. ಆದರೂ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ಪಾಸಾಗಾಣವನ್ನು ಅಧ್ಯಯನವಾಗಲೆಸುವುದು. ಹೊಸದಲ್ಲಿ ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿ ಅಥವಾ ಪಸುತ್ತೆಯಿಂದ ನಿರ್ದೇಶಿಸಲು ಕಲಿನಾಯಕರ ಹಂತ ತಲುಪತು.

3) ಹುಬ-ಅಂಬಾ ಸುಂದರ ಪುತ್ತಿಂದ ಹುಬ-ಅಂಬಾ ಸುಂದರ ಪುತ್ತಿಂದ ಹುಬ-ಅಂಬಾ ಸುಂದರ ಪುತ್ತಿಂದ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿಗಾಗಿದ್ದರು. ಹುಬ-ಅಂಬಾಗಳಿಗೆ ಕೆಲವೆಂದು ಕ್ಕೆಲವೆಂದು ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿಗಾಗಿದ್ದರು. ಆದರೂ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ಕೆಲವೆಂದು ಕ್ಕೆಲವೆಂದು ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿಗಾಗಿದ್ದರು. ಆದರೂ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ಕೆಲವೆಂದು ಕ್ಕೆಲವೆಂದು ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿಗಾಗಿದ್ದರು. ಆದರೂ ಹುಬ-ಅಂಬಾಗಳಿಗೆ ಕೆಲವೆಂದು ಕ್ಕೆಲವೆಂದು ವಿಭಾಗದ ಉಬ್ಬರಿತ್ತಿಗಾಗಿದ್ದರು.

ಬಿ. ವಿ.ಎ.
ಕಾಸ್ತಿದ್ದು ಅಪ್ಪಳ ಆರೀತ್ತ.