

As this is the final response of Karnataka state to the ESZ law, three questions remain unanswered yet: -

1. The most detailed and credible study on BNP's ESZ is the 2015 IISc report, which clearly marks highly eco-sensitive 147 villages on the park's fringe.

In my report earlier this year, I showed that only 74 of these villages are actually included, out of which 16 are just a perfunctory extent of 100 meter.

**I also underlined 10 villages in a red-list- that are extremely critical buffers for the long-term conservation of the park, however absent from the draft ESZ.**

However, the final notification has no trace of any of these findings.

**This is despite the fact that IISc report had support from Karnataka Forest Department.**

Critical Villages excluded from ESZ		
1	Bachahalli	Not Included
2	Bantanalu	
3	Bilakanakuppe	
4	Chikkamukodlu	
5	Elachavadi	
6	Honniganahalli	
7	Jangalapalya	
8	Kannaikana Agrahara	
9	Mallapur	
10	Manjilnatha	



2. The proposed ESZ strangely extends 100-meter perfunctory zone to 9 villages at the southern end of BNP.

While 100-meter zoning for seven villages at the northern end can be defended because they are significantly urbanized and dense due to proximity to Bengaluru, **please explain the ground of a similar treatment to the nine below listed villages.**

Villages with 100-meters ESZ at the southern end of BNP	
1	Garulapura
2	Doddaguli
3	Herandyapanhalli
4	Tippuru
5	Bijhalli
6	Bommasandra
7	Hosadurga
8	Salbanni
9	Guddeveeranahosahalli

3. The proposed ESZ may find itself legally untenable as the Supreme Court of India is currently reviewing the basis for 100-meter extent.

**[Pollution Control Committee vs Polygen India Pvt. Ltd. (tagged with I.A. 1000 of 2013 in T.N.Godavarman vs. Union of India (W.P. (C) No. 202 of 1995)]**

The honorable court took cognizance of this capricious zone extent that is not stated or advised in 2011 ESZ rules or any of the past judgments.

Globally scientific studies recommend buffers between 10 kilometers-50 kilometers. The 2002 wildlife conservation strategy by MoEF, and 2006 SC judgment defines 10 kilometer ESZ. Moreover, even 2011 ESZ rules suggest a minimum 1 kilometer ESZ.

Finally, I stick to my argument that such a fragile buffer zone will increase conflicts between wildlife and people, as without ESZ regulations land around BNP will continue to get fragmented and developed for commercial purposes.

Lastly, MoEF&CC should **encourage studies that help design ESZ specifically for urban forests like Bannerghatta National Park and Sanjay Gandhi National Park**, besides 70 other protected areas that are close to cities in India.

Thank you.

Sincerely,

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## **References**

**2015 IISc Report on ESA of BNP:**

[http://wgbis.ces.iisc.ernet.in/biodiversity/sahyadri\\_eneews/newsletter/index1.htm](http://wgbis.ces.iisc.ernet.in/biodiversity/sahyadri_eneews/newsletter/index1.htm) (SEARCH: Bannerghatta on web page)

**2018 BNP Report by this author:** <https://muteforce.wordpress.com/2018/06/10/intersecting-forest-and-city/>