



6 May 2021

Mrs. Rochelle Newbold
Director
Department of Environmental Planning and Protection
Ministry of the Environment and Housing

Dear Director Newbold,

RE: Lighthouse Point Environmental Impact Assessment

The Bahamas National Trust (BNT) is writing to offer our official comments on the Environmental Impact Assessment (EIA) for the Proposed Cruise Port at Lighthouse Point (LHP), Eleuthera prepared by Waypoint Consulting Ltd. and Applied Technology & Management Inc. on behalf of DCL Island Development Ltd.

While the BNT generally finds the ecological assessments quite extensive and the document comprehensive, we wish to state for the official record that it remains the view of the BNT that the best use of this area would be for the land and surrounding marine environment to be established as a protected area. LHP is of world-renowned outstanding beauty worthy of world heritage status and is currently listed as a Key Biodiversity Area (KBA). We remain disappointed that our efforts to acquire the land for the creation of a national park and associate sustainable development were unsuccessful, as this would have protected the area in its most natural state in perpetuity.

BNT does note however and accepts that the proposed developer has legally acquired the property and are now submitting, as required by environmental legislation, the EIA subject of this review. Below are our comments as a result of our review of the document.

Terrestrial assessments

We note that the botanical and avian surveys and mitigation measures are comprehensive. Notwithstanding this, we feel that other taxonomic groups, particularly amphibians and reptiles, which carry many Bahamian endemic species, are not as comprehensive as we would have preferred. Based on our knowledge of Eleuthera and the general site conditions at LHP, we would expect to find the following endemic species: Bahamian boa (*Chilabothrus strigilatus*), Bahama trope (*Tropidophis curtus*), Blindsnake (*Cubatyplops biminiensis* and *Typhlops lumbricalis*); and the following subspecies: Cuban whiptail/ Brown Anole (*Anolis sagrei ordinatus*), Bark Anole (*Anolis distichus dapsilis* and *Anolis distichus distichus*), and Cuban twig Anole (*Anolis*



angusticeps). It is our view that the ecological assessments could have benefitted from night surveys to help capture data on some of these species. These species are not appropriately protected by Bahamian law but represent unique biodiversity. It is our recommendation that if the development proceeds, that there should be a commitment to the monitoring of these species to see if and how their populations will change over time.

It should be noted that neither the Government of The Bahamas nor the BNT regard the Cuban Tree Frog as an invasive alien species (IAS).

The BNT also finds the following comment rather misleading: “Removal of mature dry broadleaf evergreen forest will result in shifts in species, abundance and distribution”; “and species that prefer less dense areas (e.g., common ground-doves, bananaquits, most migratory warblers, including Cape May, magnolia, northern parula, palm, prairie, Kirtland’s, etc.) are likely to benefit due to the creation of this type of habitat”.

Although these birds may use this habitat, the type of vegetation that normally results after disturbance often leads to birds abandoning such areas. Many warblers, bananaquits and common ground doves are generalists, but still prefer native vegetation. It is simply unknown, whether the sections that remain as natural forest will be able to support this displaced avian diversity.

Marine assessments

The marine assessments are comprehensive and extensive. The coral enhancement activities (including sponges and *Diadema*) appear sound, however we recommend cultivation and restoration of additional coral species besides the *Acropora* genus. This is becoming increasingly important due to the impacts of the new Stony Coral Tissue Loss Disease (SCTLD) spreading throughout the Caribbean. Additionally, to offset the anticipated impacts on the marine environment from the footprint of the pier, perhaps consideration could be given to enhancing other marine habitats including seagrass beds and coralline algae.

Coastal Community

- 1) The beach construction plan is an area of concern. The EIA speaks to creating wider beach area but fails to detail the impacts that will have on the dune and coastal vegetation communities present. The removal of *Casuarinas* is all that is mentioned and is a positive element generally. Nonetheless, BNT is concerned there may be substantial impact associated with the planned beach expansion, and this impact is not detailed in the EIA.



- 2) The beach nourishment is similarly not adequately addressed in the EIA. No information is provided on the plan for sand acquisition for this purpose. It is our view that this should have been addressed in the EIA documenting this as an external impact and carbon footprint.
- 3) The groins and sand stabilizers underwater present an opportunity to enhance guest experience and increase biodiversity through the creation of “living walls”. This can be created in a manner that provides recreational opportunities to explore, as well as to educate clientele.
- 4) The BNT is particularly concerned about the removal of the wrack community under the stated justification of “aesthetics and safety”. The wrack community is an important ecological zone in Bahamian coastlines. It provides habitat and food for a vast array of biodiversity, most notably for shorebirds, many of which are endangered species, and migrate to the Bahamas from North America. The BNT recommend that if the project proceeds that wrack community remain undisturbed on at least 50% of the beach. We also recommend limiting or excluding altogether, the use of mechanized vehicles for cleaning the beach. Disney should also be encouraged to develop and install educational signs about the wrack community to help educate patrons on what a healthy beach looks like naturally. Notwithstanding the above, the BNT understands that Sargassum blooms can occur, and the area may become inundated at times. We would understand the use of machinery in these instances.
- 5) The BNT would like to see a commitment from Disney to clean all debris generated from their property in the surrounding marine environment following a major storm or hurricane.

Lands to be Donated for Conservation

With regards the land being donated back as public lands, the BNT recommends that this be legally declared a protected area, never to be developed.

Concluding remarks

The BNT appreciates the extensive assessments on the marine and terrestrial environments. However, there are significant gaps in the assessments that result in the under representation of Bahamian endemic species and understanding in populations. The BNT is extremely concerned about the expansion of the beach and removal of the wrack community. Both will have a significant impact on the ecosystem functioning of the site and impact local and global biodiversity.

The most concerning aspect of the EIA is the amount that is still to be determined based on further developmental plans. There is continued reference to items needing further



development, whether for the geotechnical surveys being incomplete due to Covid-19, or regular statements such as “Additional Project design and construction methodology details are pending completion of the design process”. It is felt that the EIA should have had all these details in place before being shared for comment and therefore it is our view, that this leaves the EIA as incomplete. We recommend that this be addressed before informed decisions can be made by DEPP about this project.

The BNT is well aware that the cruise industry is a major part of the government’s tourism development plan for The Bahamas and that our islands are a major destination for the cruise industry. Notwithstanding this national economic development policy, the BNT is obligated to state our opposition in principle to this industry. Cruise ships are recognized as one of the most heavily polluting sectors in the global travel and tourism industry. According to published data, “many of the richest and most varied ecosystems in the oceans, such as coral reefs, have seen the threat to their existence increased by the presence of cruise ships in the places where they can be found.”

As such, the BNT as the leading environmental organization in The Bahamas does not support the expansion of this industry.

The record for most developments in The Bahamas has been a net negative impact on biodiversity with minimal mitigation offsets. It is the view of the BNT that developers should strive to increase the amount of biodiversity on a site through their landscaping and mitigating activities, particularly in and around ecologically sensitive areas. It is our view that if the government does approve this project, that there are opportunities for Disney Cruise Lines to demonstrate corporate environmental responsibility, and thereby help to establish a new normal for such developments in our country.

If you have any comments or concerns about anything stated in this letter, we would be happy to make ourselves available for further discussions on the matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Carey', written over a white background.

Eric Carey
Executive Director