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7th May 2021

To: Bahamas Department of Environmental Planning and Protection  
CC: Disney Cruise Line

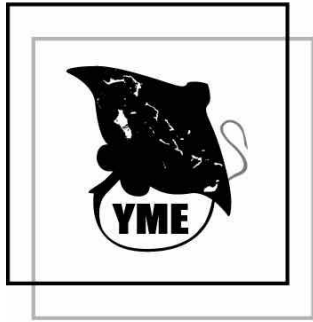
**Re: Lighthouse Point EIA**

To the Whom it May Concern:

***“ What we want to say is to please give us an equal chance to come to the table because this is our home. Disney is coming here and whenever they are ready they can pack up and leave. We live here and if we are developing a Blue Economy we need to understand the environmental impact this development will have, and how we might be able to develop a long term partnership with Disney. Hear our voice. We are so used to crumbs this is why we get excited over the thought of a \$700 paycheck without understanding that we are worthy of so much more and that our Government has a responsibility to ensure that developers coming to The Bahamas are not setting us up for longterm failure or taking advantage of us and our resources. This is why we are asking for time so that we can be educated on exactly what DCL is proposing. We cannot stress enough to our Eleuthera people that we are not against you. We are from the North of Cat Island and we know what it is to suffer. We are asking for time to become educated on what biodiversity we have in our waters so that we will be equipped to have this conversation and so we can understand the real impact that this development will have on our environment and what impacts that may have on our future. “***

***- Cat Island Conservation Institute Community Biodiversity Lab, May 6th 2021***

I am Eagleray Empress aka Nikita Shiel-Rolle. As a Bahamian Oceanpreneur, Estate Agent, Educator, and Conservation Biologist I am writing this letter on behalf of a research team from the Cat Island Conservation Institute. Our research team is comprised of diverse stakeholders from all walks of life. We understand that the traditional environmental protection approach is very top-down and has historically alienated and isolated average Bahamians, where most Bahamians often feel that animals and wildlife have been valued above human wellbeing. It is because of this that our Climate Solutions research is



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driving innovation for the co-creation of a flourishing and sustainable Blue, Green, and Orange Economy on Cat Island that places community wellbeing at the heart of biodiversity conservation. It is for this reason that we would like to express **our egregious concerns about the** DCL Light House Point project Environmental Impact Assessment (EIA) and propose actions on how we can move towards addressing these concerns.

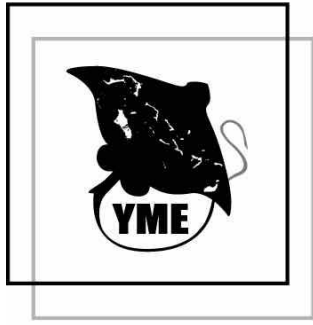
Young Marine Explorers and the Cat Island Conservation Institute is in Phase one of the UNESCO Cat Island Biosphere Reserve Project that will sustain the development of a thriving and diverse Blue Economy in Cat Island. Our Island is at the cusp of an economic boom with the first-ever Cat Island Business Outlook taking place in June 2021. Protection of our biodiversity and equitable and meaningful relationships must be at the heart of all development in The Bahamas and it is for this reason that we are deeply concerned about the current state of the DCL Light House Point Project EIA.

The Government of The Bahamas and the Bahamas National Trust (BNT) have identified sites for marine, coastal, and terrestrial protected areas for Cat Island and South Eleuthera. **As Cat Islanders that live in the North, we "overstand" the struggles of life in South Eleuthera and the desire for economic development and opportunities.** Furthermore, we were thrilled to hear The Minister of Agriculture and Marine Resources at the start of the Bahamas Development Bank's Blue Economy Think Tank in April 2021 reaffirm—the National Commitment to developing a sustainable Blue Economy. Developing a sustainable Blue Economy requires us to be unapologetic about upholding the highest standard for incoming development projects in The Bahamas.

As a member of the Sustainable Development Goals Technical Advisory Committee to the SDG Unit in The Office of the Prime Minister, I would like to clearly state that Disney has a responsibility to Ocean Nations around the world and especially The Bahamas. This is our opportunity to request that Disney demonstrates global leadership by willingly participating in the sustainable development of the new Bahamian Blue Economy. This requires that all Bahamians have a fair opportunity to understand really what is at stake in development decisions. This is critical as our colonial history has created extreme gaps in literacy and our ability as Bahamians to truly understand the value of our natural resources.

The EIA as it stands has major **egregious gaps including but not limited to:**

Firstly, the EIA continually refers to the fact that protocols will be developed in the Baseline Management Plan in lieu of discussing the actual environmental impact. It is evident that there is not enough data to really determine what the true long-term environmental impact of this development will have in South



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Eleuthera and North Cat Island, and this is another reason for a more thorough environmental impact assessment.

The fact of the matter is that there are huge data gaps. For example, there is no reference to the Nassau Grouper School located on the bridge in the Cruise Ship path. While there is no formal scientific research to document this aggregation, there are numerous accounts of fishers who frequent this site (which the EIA speaks to their inability to gather this type of data).

Additionally, it is imperative that we gain a better understanding of the resident marine mammal population between the proposed North Cat Island Protected Area and that of the Proposed South Eleuthera Protected area. “All marine mammals are protected species in The Bahamas pursuant to Chapter 244A (refer to Section 5), and several of these species are included in databases tracked by the International Union of the Conservation of Nature (IUCN) and designated as Critically Endangered, Endangered or Vulnerable.” (Disney EIA)

I am concerned that with engines running every day in addition to the increased ship traffic the EIA has no mention of how this increased noise pollution will impact the resident marine mammal populations. This is a perfect example of how a one year pause on the Disney development to enable certified community scientists from South Eleuthera and North Cat Island to develop a long term spatiotemporal community biodiversity monitoring program funded by Disney will enable Bahamian communities to not only collect data that will fill the major gaps that exist in the EIA but will, more importantly, develop critical skills that support a flourishing Blue Economy and that positions Bahamians to be in greater control of their financial future and overall wellbeing. This is a key sustainable development benefit that must come from all developments taking place in The Bahamas, especially those, like the DCL Lighthouse Point project that negatively impacts our marine biodiversity.

Perhaps the most heinous oversight is the failure to acknowledge the ecological significance of the high density of *Diadema antularium* found within the proposed development site. The conservation of this species is a major conservation priority as urchins play a critical role in improving coral reef health throughout the region.



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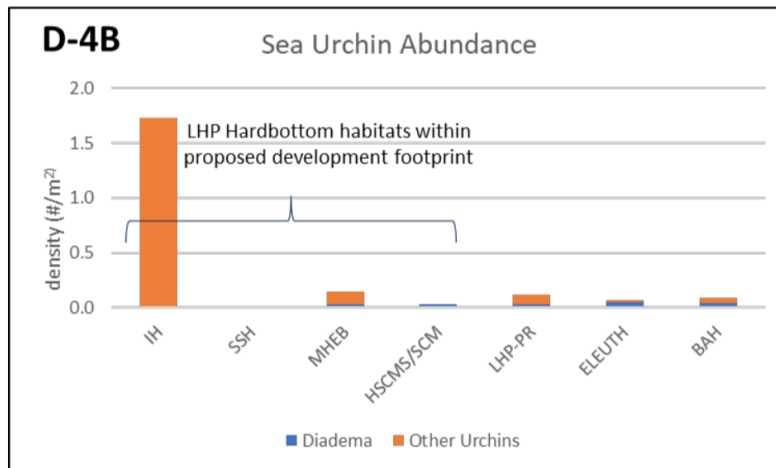


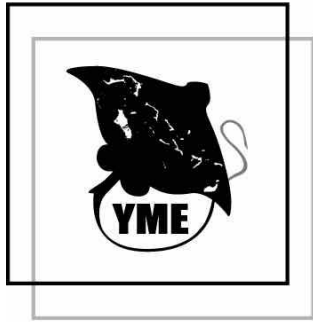
Figure D-4A: Comparison of stony coral recruit density indicator for LHP hardbottom and reef habitats. Coral recruits are an indication of the amount of coral larvae in the water column and the suitability of habitat substrate for settlement and growth. Several of the hardbottom habitats high levels of recruitment which is surprising given their low abundance of adult corals. This may be related to the close proximity of strong daily tidal currents that sweep over these hardbottom areas and bring in larvae.

Figure D-4B: Comparison of sea urchin abundance for LHP hardbottom and reef habitats. Urchins are important herbivorous grazers of algae. The black long spine urchin (*Diadema antillarum*) was present in low numbers on all habitats except for SSH. Inshore hardbottom habitats contained particularly high numbers of *Diadema* and the boring rock urchin.

Figure Habitat Abbreviation Key: Inshore Hardbottom; SSH = Sparse Sandy Hardbottom; HSCMS/SCM= Hardbottom with Scattered Coral Mounds and Sponges/SCM= Scattered Coral Mounds; LPR-PR= Light House Point Patch Reef; ELEUTH= site average values from Eleuthera reefs (AGRRA database); Bah=site average values from all Bahamas Reefs (AGRRA database).

It is because of the above mentioned egregious concerns that we are proposing that Community Environmental Impact Assessments (CEIA) be conducted by certified local community marine scientists from South Eleuthera and North Cat Island and that this story become an educational tool that Disney creates to introduce Bahamians to understanding the great value that lies within our oceans. A CEIA will not only provide higher quality data about critical economically important ecosystems and illustrate the true environmental impact of this development in a way that the Bahamian people can understand. Additionally, it will meaningfully elevate community voices in our national development process.

A Community Based Environmental Impact Assessment (CEIA) will not only develop critical Blue Economy skills for members in South Eleuthera and the neighbouring North Cat Island but Disney will



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also be seen as a leader in supporting diversity, equity, and inclusion in their business practices. Acknowledging their immense privilege and power, by supporting meaningful sustainable development in the very marginalised communities in which they are only proposing to offer what they describe as “150 well-paying jobs at \$600 - \$700 a week, a total of just about \$5,460,150 an insignificant number in comparison to the \$406,170,000 million profit on \$1.6 billion revenue earned by DCL in 2019.

In closing, I would like to emphasise that I am deeply concerned with the underwhelming and egregious lack of substance in the EIA as it relates to the Environmental Impact of the Cruise Industry in perpetuating the climate crisis and the environmental impact of the industry on the entire country of the Bahamas.

We urge the Government of The Bahamas to place a one year pause on this project until a Community Environmental Impact Assessment (CEIA) has been conducted and publicly reviewed.

Kind regards,

Nikita Shiel-Rolle, MSc

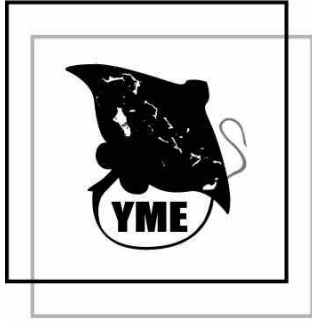
*Cat Island Conservation Institute Community Biodiversity Lab Member*

*Founder & CEO Young Marine Explorers*

*Arthur's Town, Cat Island*

[nikita@ymebahamas.org](mailto:nikita@ymebahamas.org)

242-474-2679



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