



Peninsula Citizens for Sustainable Development  
General Delivery, Placencia Peninsula, Belize  
[www.saveourpeninsula.org](http://www.saveourpeninsula.org) «» [info@saveourpeninsula.org](mailto:info@saveourpeninsula.org)  
011-501-523-4018 or 011-501-610-4718

---

**Comments on Environmental Impact Assessment  
Proposed Chrysalis Resort at Big and Little Channel Cayes  
Pelican Range, Southwater Marine Reserve, Belize Barrier Reef  
29 September 2009**

**Introduction**

Following are the comments of the Peninsula Citizens for Sustainable Development (PCSD) on the Environmental Impact Assessment for the proposed Chrysalis Resort development on Big and Little Channel Cayes in the Pelican Range of the Southwater Marine Reserve.

Please note that PCSD would be in favor of the proposed Chrysalis Resort if were not located in a World Heritage Site, if it did not “need” a helicopter for transfers and possibly tours, if the issue of the probability of leakage from the injection well could be resolved, if fly fishing flats would not be impacted, and if the developer were willing to pay for independent monitoring to ensure compliance with the ECP and licenses and permits.

The resort is small, in keeping with the scale of existing resorts, and the developer does seem to be sincere in its desire to impact the environment as little as possible.

However, as explained more fully below, the risks identified in these comments are simply too great, particularly the possibility of losing World Heritage Site designation for the Belize Barrier Reef, and the impact of the resort on the very important Belize fly fishing industry.

**Discussion**

1. **World Heritage Site:** Belize is a party to the 1972 Convention Concerning the Protection of World Cultural and Natural Heritage, which means that the Convention is a legally binding obligation of Belize. Article 5, Section 4 of the Convention *specifically obligates* Belize to take “the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage.”

Earlier this year, UNESCO and the World Heritage Committee (“WHC”) determined that Belize has not fulfilled its obligations under the Convention and UNESCO consequently inscribed the Belize Barrier Reef System on the List of World Heritage Sites in Danger. This action was based on Belize’s ineffective protection of its World Heritage Sites, and in particular, excessive development and filling of mangrove islands in the Pelican Range of the Southwater Marine Reserve, in which Big and Little Channel Cayes are located.

In conjunction with the placement of the Belize Barrier Reef on the Danger List, the World Heritage Committee specifically recommended that Belize prohibit dredging and removal of mangroves on cayes within the Southwater Caye Marine Reserve.

The obligations of caring for a World Heritage Site, a place of outstanding value to the entire world, were not thrust upon an unwilling Belize. Instead, Belize applied to for World Heritage status and the Belize Barrier became a World Heritage Site on 4 December 1996.

WHC is now only attempting to enforce Belize's willingly undertaken obligations. And, if Belize does not comply with these obligations it runs the risk of withdrawal of World Heritage Site designation for the Belize Barrier Reef.

Losing World Heritage Site designation will have a huge economic impact on every business owner, property owner and employee in the ENTIRE country – from tour guide, to tour operator, to restaurant owner, to gift shop owner, to hotel, lodge and resort operators, to waitress, bartender, busboy, street vendor, airline, bus company, farmer, rancher and office employee. No one will be left untouched – not even resorts and hotels located inland rather than on the coast.

For example, according to the 2008 tourism statistics from the Belize Tourism Board, just under 235,000 tourists visited Belize last year. Of that number, 21,600 overnight tourists visited the Xunantunich Mayan ruins, while 3 times that amount -- over 63,000 tourists -- visited the Hol Chan Marine Reserve. And, in international media, the Belize Barrier Reef gets the most attention as the reason to spend a holiday in Belize. While here, tourists may also visit the jungle, but the primary reason for the visits of 99% of our tourists is our Reef.

Belize capitalizes on our Reef by touting it as the “pristine” Belize Reef along with our “pristine” beaches and cayes -- *Mother Nature's Best Kept Secret*.

What will happen to these claims we use to attract tourists to Belize -- tourists who contributed BZ\$585.8 million dollars to the Belize economy in 2007 -- if we lose our World Heritage Site designation?

Plenty. When WHC placed the Belize World Heritage Site on the Danger List, the word spread like wildfire through the traditional and social media – via such disparate mediums as *The Baltic Times*, the UK's *People Daily*, *Scuba Travel News*, *The World Sentinel*, the *Mount Everest News*, *China Daily*, *Carib Daily*, the *Trinidad and Tobago Review*, *E-Media Wire*, CDNN, *The American Chronicle*, *X-Ray Magazine* and *National Geographic*, not to mention, Facebook®, Twitter®, My Space®, LinkedIn® and innumerable Internet blogs.

*Mother Nature's Best Kept Secret?* How about Mother Nature's Most Well Known Tragedy? A tragedy for an entire country that depends on its tourists to keep it afloat – taxes, fees, licenses, visas, import fees and duties, and direct purchases of souvenirs, gifts, tours, hotel rooms, meals and other services – not to mention a tragedy for the entire world when our stewardship of our Reef changes it from a place of outstanding universal value to a place we're in the process of destroying.

Therefore, a decision by the Belize government through DOE and NEAC to approve the Chrysalis Resort development will CLEARLY and UNDENIABLY demonstrate a preference by the Belize government for foreign investors over existing Belizean investments of hundreds of millions of dollars that depend on the health and international recognition of our Belize Reef.

Sadly, such a decision will also demonstrate that Belize does not respect or honor its international obligations – or its beautiful and precious marine environment.

- 2. Southern Belize Sport Fishing Industry.** Southern Belize is famous for its flat fishing where an angler can wade and sight cast to permit. But, the number of flats are limited, and becoming crowded during peak tourism season when fly fishing guides make 70-90% of their total annual incomes for an entire year -- not just their incomes from guiding, but their entire yearly income, including commercial fishing and diving for conch and lobster. And, these guides are the elite among southern Belize fishing guides, many earning US\$300 or more per day of guiding.

Thus, jeopardizing the Channel Cayes flats could be devastating to the fly fishing industry in Southern Belize – and the ability of guides and tour operators to support themselves, their families and communities – not to mention the taxes generated by this industry, which brings over 47.9 million dollars into the Belize economy per year – over 6 million of which is contributed annually by clients of independent fly fishing guides, the mainstay of the southern Belize fly fishing industry.

Although dredging in the locations proposed by the Chrysalis developers will harm the flats and destroy coral that provide food for the permit that inhabit the flats and are the prize catch of a saltwater fly fishing angler, the helicopter transportation that the developer says is essential to the economic viability of the resort will be deadly to a large portion of the southern Belize fly fishing industry.

Permit are notoriously hard to catch – which is why so many fly fishing anglers flock to our internationally known *Permit Alley*, located roughly from Dangriga into Placencia, to try to catch them. And, one of the the reasons they're so hard to catch is that they can be spooked by almost anything, including a cloud racing over the sun. A helicopter's wind, vibration and noise will guarantee their abandonment of the flats, not only in the Channel Cayes area, but also every single flat in the helicopter's flight path between Belize City and the proposed resort.

And, we suspect that the developers intend to use the helicopter not just for transportation but also for low-flying sightseeing tours of the cayes, which means the destruction of ALL permit flats as far south as the Sapodillas, possibly throughout the entire southern half of the country.

Approving Chrysalis will demonstrate a clear preference by the Belize government for foreign investors over local Belize businesses, tour operators and tour guides.

- 3. Enforcement:** The Placencia area has seen absolutely no enforcement capacity or capability by DOE, Geology or Forestry. ECP conditions are not enforced, mangrove is cut without permits, dredging permits are never checked and no one can say with any remote degree of certainty how much is actually dredged under any dredging permit. (We have in our files a copy of a registered letter dated 3 August 2009 to Mr. Craig Moore of Geology asking for specific amounts dredged for Rendezvous Caye, the Peninsula Club and the Placencia Lagoon as a whole since 2007. As yet, we have not received a response to this letter.)

Unfortunately, Rendezvous Caye off the Placencia coast graphically illustrates the lack of enforcement of environmental regulations and permit conditions.

- a. On 29 April 2009, PCSD made a formal written complaint to Kenrick Gordon, the Environmental Compliance Officer for DOE, regarding the construction of a sea wall in clear violation of the ECP for Rendezvous Caye, and obviously willfully and wantonly constructed by the developer without regard to the ECP which requires the seawall to be BELOW the surface of the sea. (It would be hard to construct this seawall “accidentally.”) This correspondence was sent by fax, email and registered mail, receipt no. 27113.
- b. On 7 July 2009 (2 months later), PCSD received a letter from Martin Alegria, CEO of DOE, stating that DOE had written to the Rendezvous Caye developer to inform him of DOE’s findings and to request certain information be submitted to DOE.
- c. As of today (almost 5 months since our initial letter), that information does not appear to have been submitted, no action has been taken, and the developer continues its development of Rendezvous Caye.
- d. A copy of a picture that the Rendezvous Caye developer uses to sell pre-construction fractional and unit trust interests in Rendezvous Caye is attached to this comment letter. This picture clearly shows the above-sea seawall around virtually the entire perimeter of Rendezvous Caye.

Clearly, not only is monitoring not being done, but relevant government departments do not respond to complaints – even those complaints made BEFORE a developer has taken irrevocable illegal actions.

Many, many complaints have been made about Rendezvous Caye from people in the Placencia area. But, apparently, no one responded to those complaints until a video of Rendezvous Caye was posted on You Tube (<http://www.youtube.com/watch?v=cukM-XWgLA8>) And, even after a monitoring visit was finally made, no enforcement action has still been taken, as detailed more fully above.

Another example of the inability of government departments to timely respond when violations are in progress occurred earlier this year when the Placencia Village Council attempted to stop a developer’s representative from illegally clearing a large swath of mangrove in Placencia Village. Despite repeated calls to Forestry, the Village Council itself could not get an enforcement officer to the Village until the destruction was completed.

If development conditions in ECPs and permits and licenses appear to be meaningless, even in accessible locations, how can any development in a remote location be approved when we all know that no monitoring or enforcement can or will occur. Forestry has no boat, Fisheries won't enforce mangrove regulations because those are under Forestry, and Geology seems to issue dredging permits without regard to any environmental issues at all.

#### 4. Dredging/Filling:

- **Dredging Locations:** As clearly explained at the public consultation on 15 September 2009 by Mr. Lincoln Westby, owner of Blue Horizon Lodge, a fishing lodge located less than 1 mile from Big and Little Channel Cayes, dredging in the location (or locations) described in the EIA will destroy flats in the area, as well as coral and seagrass beds that provide shelter for crabs and other marine life which are the primary source of food for permit and other fish in the area – again greatly harming the very important fly fishing industry of southern Belize. Mr. Westby has been guiding in this area for well over 25 years.
- **Amount to be Dredged:** EIA dredging quantities are inconsistent – how much fill will actually need to be dredged, and how will anyone know whether the amount of material dredged actually complies with any dredging permit issued for the development?
  - Page 2-28/29 of EIA states that 22,136.41 cubic yard of fill are needed (16,924.5 cubic meters)
  - Section 1.4.2.1 says 29,323 cubic cards will need to be dredged with 27,877.92 cubic yards required for fill
  - Section 1.3.3.1 states that the number of “mini-islands” connecting the boardwalk will depend on how much fill is left over after filling beaches, areas for cabanas, etc. Does or doesn't the developer know how much fill is needed and how much dredging will be done?
    - Please note that the site plan for the development shows only one beach of 300 feet in length on the northern part of Big Channel Caye. However, EIA Section 1.3.4.2 (recreational beach areas) states that each cabana, except the over-water cabanas, will have its own private beach, because “*this accessibility will be one of the main selling points of the proposed undertaking.*” No information is provided about the size of these private beaches, further reinforcing the conclusion that the developer doesn't know how much dredging will actually occur.
- **Dredging Mechanisms:** The EIA states that an auger suction dredge will be used for dredging. However, the EIA also says on page 2-28 that “other dredging mechanisms will include the use of excavator and grab type dredging machines.” An auger suction dredge can be very precise in the amount and location of dredging, and can limit the amount of silt produced. However, the same is not true of excavators and grab type dredging machines. Where would these type of dredgers be used, and why?

- **Containment Pond:** Where will the containment pond be located – we could not locate it on the site plan. How will the leached water from the dredged fill be treated and where will its disposal be?
- **World Heritage Site:** The World Heritage Commission identified dredging within the Belize World Heritage Sites as one of the primary threats to the universal outstanding value of the Belize Barrier Reef. Consequently, the Commission has recommended that no further dredging occur within the Belize World Heritage sites.

In its recommendation, the Commission also specifically singled out Southwater Marine Reserve and the Pelican Range (where the Big and Little Channel Cayes are located):

*“Also in South Water Caye, inscribed “on account of the extraordinary high diversity of sessile animals, particularly sponges and tunicates, in the lagoons and on the mangrove roots”. These are being lost mainly due to cutting of mangroves and land-fill on Pelican Cayes. Direct observations show a clear deterioration of the ecosystem with a substitution of the diverse wildlife with macroalgae in some parts and hair algae or nothing at all in others.”*

- 5. Construction:** Very serious construction issues are completely ignored by the EIA – and by DOE since no construction requirements were included in the Terms of Reference.
- Section 3.2.3.1 states that water for the construction phase will be provided by the water desalination plant. But, what will be the water source for the workers who build the plant?
  - How will waste water from construction and construction workers be treated before it enters the Sea? Section 1.4.2 states that 30-50 construction workers will be needed at the site depending on the phase of construction. *Therefore, there will be as many construction workers on the site for a long period of time as there will be guests and employees at the resort after its completion. The EIA recognizes the very high importance of waste water treatment for resort guests and staff, but completely ignores this issue for construction.*
  - What kinds of shower, restroom facilities and drinking water sources will be provided for construction workers? Will the developer be obligated to require that restroom facilities be used by the construction workers? How will this be enforced? (If workers do NOT use port-a-potties or something similar, the effect of human waste on the surrounding sea grass, corals and fish could be devastating.)
  - How will construction materials be transported to the Cayes? Section 1.4.2.3 states that the developer doesn't know whether it will use construction barges or 41 foot boats to transport construction materials. These two options present very different environmental issues that should have been dealt with in the EIA.

## 6. Water:

- **Quantity:** Once again, the EIA consultants have underestimated the amount of water that will be used by guests in the tropics, swimming in salt water (no fresh water pool) – and especially without air conditioning. As we have pointed out time and time again, Caribbean resort guests (with the benefit of a/c) have been documented as using 150-180 gallons per day in St. Lucia and Barbados, respectively. (page 3, *Environment and Tourism: Examining the Relationship between Tourism and the Environment in Barbados and St. Lucia* [www.sia-gcc.org/acp/download/acp\\_eu\\_sia\\_tourismenvironment\\_case\\_study.pdf](http://www.sia-gcc.org/acp/download/acp_eu_sia_tourismenvironment_case_study.pdf))
- **Wastewater:** The proposed Chrysalis Resort will be collecting and producing its own water supply. Therefore, the low per day per guest water consumption figures used by the EIA consultant don't particularly affect anyone except the resort guests, owners and staff EXCEPT for wastewater production. Low water use estimates also mean low wastewater production estimates, which may have a significant effect on the marine environment if the capacity of the BESST system is inadequate.

Further, water standards such as those required by the Belize National Effluent standards and the BESST level of wastewater production will not protect coral reefs, which are the most sensitive of all marine eco-systems. Optimum water quality standards to protect coral requires <0.014 ppm N or 0.40 ppm NOE and 0.003 ppm P or 0.007 ppm PO<sub>4</sub>, while BESST produces 5 mg/L of N and 2 mg/L of P. (According to the EIA, 50% of wastewater will be used for irrigation, which WILL reach the Caribbean.)

Also, the EIA does not discuss the treatment of bilge water. Bilge water is quite different from sewage water and needs special treatment to remove oil, grease, suspended particles and organic matter, all of which can create substantial problems if treated improperly.

- **Injection Wells:** The use of an injection well for brine produced by the desalination plant AND storage of unused waste water may severely harm the surrounding sea grass beds and marine habitat – unacceptable under any circumstances, but especially in a World Heritage Site.

A recent study by researchers at the University of South Florida has proven that wastewater disposed of in a Class V injection well can rapidly contaminate ground and marine waters. As found in this study:

A recent report published in the June issue of Water Research by researchers at the University of South Florida indicates that wastewater disposed by these practices can rapidly contaminate groundwater and surface marine waters.

These investigators, led by Drs. John H. Paul and Joan B. Rose, used harmless bacterial viruses as a tracer for the movement of wastewater from a recently permitted class V disposal well in the Middle Keys.

This well meets current DEP requirements, which means that the well was drilled to 90 feet and cased with PCV pipe to 60 feet. Within 8 hours of addition of the tracer, it was detected in the groundwater, and within 36 hours it was detected in Florida Bay.

By 53 hours, the tracer appeared in a canal on the other side of US1, on its way to Hawk Channel and the Atlantic Ocean.

A second experiment performed last fall indicated that the tracer could move from the waste disposal well to the same canal in less than 8 hours, if strong North winds associated with a cold front occurred at the same time.

The meaning of these results is that wastewater from injection wells can rapidly make its way to the subsurface. This could cause potentially serious health problems for bathers in canals and coastal waters around the Florida Keys.

Disease causing microorganisms could be transmitted from wastewater to these waters where they could potentially infect bathers, windsurfers, jetski operators and other participants in recreational water-contact activities.

A second reason for concern is the transport of nutrients (inorganic and organic) into marine waters. These act like fertilizers which cause algal growth and water quality deterioration.

*Evidence for Groundwater and surface marine water contamination by wastewater contaminated by waste disposal wells in the Florida Keys*, Water Research 31 (6): 1448-1454 John H. Paul University of South Florida, <http://www.reefrelief.org/coralreef/study/wastewater.html>

## 7. Solid Waste

- **Hazardous Wastes:** As usual, little attention is paid to hazardous waste disposal. And in this case, the issue of pesticides and insecticide use is minimized – almost avoided on pages 5-20 and 5-21 of the EIA. Big and Little Channel Cayes are BUGGY, and since the developer says that most of the mangroves will be maintained, the bugs are going to stay unless the developer does something to get rid of them – enter insecticides and pesticides. Not only will these substances enter the marine environment when they are applied, the containers in which they are stored will also need disposal, along with batteries, oil and gas filters, cleaning products, insect repellants brought and left by guests, medications, used oil, etc. According to the EIA, these hazardous wastes will be brought to the Placencia Peninsula and dumped in its garbage dump, thereby ridding the resort owners of the problem, but throwing it onto Peninsula residents without compensation, especially for the risks associated with handling, breathing and drinking contaminated air and water.

- **Water bottles:** The EIA states that bottled water will be provided to guests for drinking water. This is unacceptable if the water will be in plastic bottles – we already have far, far too much plastic waste in Placencia and in the world’s marine environment.
- 8. Sea Wall:** Section 3.6. states that the developer intends to install a sea wall on the eastern side of the islands, but gives no information on the type of sea wall, whether it will be above or below the water’s surface or what materials will be used to construct it. Further, if the developer intends to keep most of the mangrove as stated in the EIA, including the 66-foot reserve, it’s difficult to visualize exactly where and how the sea wall will be installed, and the EIA does not provide this information. Again, Rendezvous Caye rears its illustrative head.
- 9. Over Water Cabanas:** Mr. Jorge Franco stated at the public consultation that the over-the-water guidelines were not in effect, and were only guidelines, so nothing prevented the developers from constructing over-water cabanas. This is simply wrong. The developers don’t own the seabed. In fact, the legal descriptions for the lots they have already purchased on Big Channel Caye do not even give them ownership of the 66 foot reserve – the reserve is completely excluded. (In most deeds, the legal descriptions include the reserve, so that the owner of the lot owns the reserve, subject to an easement in favor of the public, but not in this case.) Therefore, the developers have no right to develop the seabed and build over-water cabanas without the express permission of the Physical Planning Section of the Department of Lands, and in strict compliance with the Guidelines and any conditions imposed by the Physical Planning Department – IF permission is granted.
- 10. Developer’s Investment/Due Diligence:** As with seemingly all EIAs since at least 2006, the EIA for Chrysalis states that a no-action alternative is unacceptable because of the developer’s investment in purchasing the property. This statement is not only untrue, it’s dangerous. *Since when did Belize become a guarantor for every person who decides to take a gamble on an investment?* Because that’s what a developer does when he or she decides to purchase property without first having all the approvals needed for a proposed development – gamble.

Here, the developer could have asked for a contract contingency that would have excused it from any obligation to purchase Big Channel Caye if environmental approval were not obtained. If the developer asked for such a contingency and it was denied, that should have sent strong warning signals. Instead, the developer chose to purchase the property anyway, gambling that it would get the needed environmental approval. If the developer loses that gamble, that’s no concern of Belize, especially the Department of the Environment. The developer made a decision on what to do with its money – and in doing so, assumed the risk of NOT getting all the necessary approvals.

Further, the developer cannot claim that it did not know the Cayes are in a World Heritage Site – that’s readily obtainable public knowledge – as is the need for environmental and other approvals. Our guess is that the idea of being able to have a resort on a Caribbean island in an English speaking country and within a World Heritage Site caused the money-making glands to start working over-time and may have obscured rational decision making.

Whatever the reason the developer decided to gamble and take the risk of not getting environmental approval – that’s simply no concern of ours.

And, in the scheme of things – the developer paid US\$325,000 for Big Channel Caye (according to the purchase price recorded in the deed and we assume everyone was honest and truthful in that document). US\$325,000 is the price of a small house where the developer comes from. Not so much of a gamble, really – and not so much of an economic loss if the development is not approved.

## 11. Cultural, Social and Economic Impact:

- The EIA ignores social, cultural and economic impacts on local Belize businesses in Section 5.4.1 of the EIA which states that the closest tourism operation is almost 6 miles away at Southwater Caye, completely ignoring tourist facilities on much closer cayes, such as Blue Horizon Lodge on Northeast Caye, less than a mile from the Channel Cayes, Tarpon Caye Lodge on Tarpon Caye, Whipray Caye Lodge on Whipray Caye, Ran Villanueva’s tourists facilities on French Louie Caye, and George and Lisa Westby’s tourist lodging on Crawl Caye.
- The EIA repeatedly dismisses the very lucrative sport fly fishing industry in southern Belize – an industry that provides a very good living to Belizean fly fishing guides, when it describes this impact as “decreased economic benefits” to those “small fishermen who utilize the Pelican Range as a fishery resource.” (See section 2 of these comments for further information on the southern Belize sport fishing industry.)
- The EIA states that the proposed resort is supported by local fly fishing guides. However, the resort clearly was not explained to them, as evidenced by the statement of one guide that he would like to “see the proposed resort where they can take their clients for a meal and refreshments without them having to transport more ice boxes to sea.” That will never happen as clearly stated in Section 3.2.1 which explains that the total occupancy number of 70 for the resort “*does not include transient visitors as the project will not cater to these individuals except in emergency situations.*”

Another fly fishing guide we spoke to said that the resort was explained to him as just a few cabins and he could get work there. No mention of dredging, helicopters, etc. – or that all fishing guides except for deep sea fishing would be employed in-house by the resort and no independent guides would be used.

- As with every EIA for every resort proposed for the Peninsula, the EIA does not recognize the substantial hardship imposed on Placencia and Seine Bight Villages to deal with transient construction worker s- increase in crime, increase in numbers of children to be educated in the local schools, increased water consumption, increased trash, increased wear and tear on what little infrastructure the Peninsula has. (While construction workers will stay on the Cayes for weeks at a time if the resort is approved, they will have to be on the Peninsula from time to time, not to mention before and after construction is completed, and not to mention the number who bring their families with them.)


Is it really fair and equitable to impose these burdens on the Peninsula when it will receive so little benefit from the resort, which will be all inclusive, and will not provide business for local restaurants, tour operators, tour guides (only private inland tours and deep sea fishing tours will be provided by local guides), taxi services, gift shops, etc. (especially if the Villages are completely bypassed by helicopter service directly from Goldson)? *Remember, at capacity, only 24 guests and only 46 employees.*

**12. Coastal Zone Guidelines for the Channel Cayes:** Much is made in the EIA of the 1995 Coastal Zone Cayes Development Guidelines, completely ignoring the Coastal Zone Guidelines for Channel Caye of 2001, which recommend no development at all on Big and Little Channel Caye, only the small caye, primary use as a fishing camp, with secondary use as a guest house, maximum lot size of 1 acre, 1 house per lot, maximum of 2 houses, with a maximum of 7 rooms. Electricity to be provided by generator/solar/wind, solid waste to be removed to mainland, latrine for liquid waste, 1 pier per site, with development only taking place at the site of the present camp on the small caye lying to the north of Big and Little Channel Cayes. These Guidelines recommend that Big and Little Channel Cayes remain in their natural states.

**13. Ownership Information:** No ownership information is provided for Big Channel Caye, only Little Channel Caye. Further, some comments in the EIA, such as the comment that individual sewage treatment plants for each cabana would be “owned” by that cabana, make us believe that the developers intend to sell fractional interests in Chrysalis. Very different management and operation issues are presented if this is the case, and should have been addressed in the EIA, but weren’t.

Sincerely,

Peninsula Citizens for Sustainable Development,  
Ltd.



By: Mary V. Toy, Co-Chair

cc:

Placencia BTIA	Southern Environmental Assoc.	Placencia Tour Operators Assoc.
Placencia Tour Guides	Placencia Village Council	Seine Bight Village Council
Monkey River Village Council	Monkey River Tour Guide Assoc.	<i>The Amandala</i>
<i>The Reporter</i>	<i>The Guardian</i>	<i>Belize Times</i>
Love FM		

# Rendezvous: Development Progress

