



Peninsula Citizens for Sustainable Development

General Delivery, Placencia Peninsula, Belize

www.saveourpeninsula.org «» info@saveourpeninsula.org

011-501-523-4018 or 011-501-610-4718

29 September 2009

Mr. Martin Alegria
Department of the Environment
10/12 Ambergris
Belmopan, Belize

Re: *Proposed Chrysalis Resort at Big and Little Channel Cayes*

Dear Mr. Alegria:

Enclosed are the comments of the Peninsula Citizens for Sustainable Development, Ltd. (PCSD) on the proposed Chrysalis Resort at Big and Little Channel Cayes, located in the Pelican Range of the Southwater Marine Reserve, a World Heritage Site.

Despite the small size of the proposed resort and that fact that it might be sustainable in another location, PCSD must urge both DOE and NEAC to deny approval of the resort, based, *in part*, on the following factors:

- **World Heritage Site Status:** Belize's failure to comply with the recommendations of UNESCO and the World Heritage Committee to ban mangrove cutting and dredging within our country's World Heritage Sites exposes Belize to the danger of having World Heritage Site status withdrawn from the entire Belize Barrier Reef.

If World Heritage Site status is withdrawn, the economic losses to every property owner, hotel, resort, tour operator, tour guide, gift shop owner, business owner, employee and street vendor from Ambergris Caye to Punta Gorda will run into the hundreds of millions of dollars.

Therefore, a decision to approve the Chrysalis Resort development will CLEARLY and UNDENIABLY demonstrate a preference by the Belize government for foreign investors over Belizean investors because of the devastating economic effect such a decision will have on local Belizean investments.

- **Environmental and Economic Impact on the Belize Sport Fishing Industry in Southern Belize.** Belize's fly-fishing industry directly contributes over 47.9 million dollars per year to the Belize economy – with over 6 million dollars per year coming from independent guides alone.

The flats adjacent to the Channel Cayes are some of the most productive permit fishing flats in the country, and are used by independent fly fishing guides and their clients from Dangriga to Monkey River. The dredging and helicopter transportation proposed by the Chrysalis developer would ruin these flats for sport fishing, jeopardizing the incomes of existing Belizean guides, tour operators and other local Belizean businesses. Further, the helicopter would ruin not just the Channel Caye flats, but all flats within its flight path from Belize City to Big and Little Channel Cayes.

And, like a decision to approve Chrysalis despite the threat of loss of World Heritage Site designation, approving Chrysalis under these circumstances would also demonstrate a clear preference by the Belize government for foreign investors over local Belize businesses.

- **Enforcement:** Neither DOE, nor Forestry, nor Geology have enforcement capability, as amply demonstrated by the unauthorized dredging and seawall construction at Rendezvous Caye. If DOE, Forestry and Geology cannot manage enforcement at Rendezvous, how can they possibly enforce anything at Big and Little Channel Cayes that are located even further off the Placencia coast than Rendezvous? Therefore, the developer may promise everything, but can, in fact, do anything, regardless of its promises, as also amply demonstrated by Rendezvous Caye, and the failure of DOE to enforce any sanctions against the developer there, despite clear evidence of a willful and wanton breach of ECP conditions by the Rendezvous Caye developer.

The Big and Little Channel Cayes marine environment is simply too diverse, too rich and too valuable to expose it to the dangers of non-enforcement.


- **Deep Injection Well:** Recent research by the University of South Florida in the Florida Keys has proven that wastewater injection into deep injection wells *can rapidly contaminate ground water and surface marine waters*, thus posing unacceptable risks to this area of outstanding universal value – not only to the marine environment, but also to guests and staff. *(Please note that this new research also significantly affects the development approved at Harvest Caye, particularly with respect to manatees in this area.)*

The proposed Chrysalis Resort presents too many unacceptable economic and environmental risks for the entire country, and specifically for Belize guides and tour operators in Southern Belize, and we therefore urge that approval be denied.

Additional information about the issues noted above, as well as other environmental, social and cultural issues can be found in the attached PCSD Comments on the proposed Chrysalis Resort.

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.

The Amandala

The Reporter

The Guardian

Belize Times

Love FM