



## BELIZE FISHERIES DEPARTMENT

MINISTRY OF AGRICULTURE AND FISHERIES

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Date: January 20, 2010

### Comments on Placencia Marina EIA 2<sup>nd</sup> Submission

1. Overall, the EIA is generic. It is not site specific when it discusses sediment transport, meteorology, benthic substrate, etc. Most of the studies discussed are from other EIAs and are not specific to the project site. Other EIAs can be used as reference, however, the EIA preparers should conduct their own studies in the project location.
2. Some illustrations need to be enhanced or magnified as they are blurry and lack legible legends (example: Figures 2.4, 2.13 and 4.3).
3. The EIA does not state the exact location of where fill material for the geotubes will be obtained from. This needs to be identified (GPS coordinates, dimensions, map illustrating its location, etc.).
4. The EIA does not indicate the impacts that will occur on longshore currents. The document only describes monitoring after the construction of the marina. It does not discuss any study done on what may occur as a result of having the marina constructed; prediction modeling is lacking within the document (pg 132). The document only discussed that it is "believed" that the tombolo effect will occur on adjacent properties (E12).
5. Results of the flora and fauna survey are inadequate. In the EIA, there is generalization of organisms, example: sessile cnidarians (pg 57). The document needs to list all flora/fauna observed and documented during the survey providing details of the result. A habitat map should also be developed for the specific site as well as within the zone of influence of the project. This should illustrate the different environs in the immediate site and the surrounding area. A map/diagram should also illustrate the distance of the site to patch reefs or corals known to occur in the area.

*The Mission of the Department is to provide the country and the people of Belize with the best possible management of aquatic and fisheries resources, with a view to optimize the present and future benefits through efficient and sustainable management*

6. The sections on the impacts of flora and fauna as well as mitigation measures are inadequate (pg 187) within the document. Following a complete and thorough flora and fauna survey, the impact section can then be expanded fully (and not only discuss manatees and sea grass beds). Most mitigative measures discussed under this section do not ameliorate impacts of flora and fauna directly. This section also needs to be revised.

## NEAC MEETING REPORT

Date of NEAC Meeting: January 21<sup>st</sup>, 2010

Location: DOE Conference Room, Belmopan

Time: 9:35am- 12:45pm

### Attendance:

Martin Alegria, DOE	Jorge Franco, DOE
Rolando Chan- Lands Dept.	Eden Garcia, UB
Vivian Belisle-Ramnarace, Fisheries Dept.	Colin Gillett, CZMAI
Michelle Alvarez, Geology Dept.	Amanda Burgos-Acosta, BAS
Wilbur Sabido- Forest Dept.	Rudolph Williams, MET
Michael Jenkins- BPA	Michael Huesner, BTIA
Emily Aldana, MED	

### Matters arising:

- NEAC Compliance Monitoring Trip (Challilo, Mollejon, and Vaca Dam) on the 10<sup>th</sup>-11<sup>th</sup> of February 2010.

### **Issues of Placencia Marina EIA 2<sup>nd</sup> Submission**

- Overall document is generic. General information provided in the EIA.
- Size of marina has decreased but not the number of slips
- Beach erosion- no prediction modeling done.
- Document doesn't state location/source of fill material or limestone needed for geotubes and rip rap armor.
- No mechanisms for monitoring of water flow within the proposed marina were presented.
- Navigation aids need to remain throughout operation.
- Water quality information not adequate (did not match EPA, need to test downstream, etc).
- Solid waste dump is already unsustainable.
- Pictures/illustrations are too vague.
- Specific scientific data lacking: Coastal modeling and bathymetry.
- Coastal modeling to discuss flushing, sediment transport, alternative break water design.
- Manatee data outdated.
- Water resources; well may have reached its capacity.
- One of the breakwaters is not accurately placed; maneuverability of the 200ft yachts is an issue.

- No mention of navigational lights at entrance of the marina

### Conclusion

- Information is lacking and needs to be presented:
  - Ocean Dynamics (oceanographic data: benthic substrate, bathymetry, coastal modeling, etc.)
  - Source of fill material and limestone for geotubes and rip rap armor.
  - Aquifer test (needs to be done)