



## Peninsula Citizens for Sustainable Development

General Delivery, Placencia Peninsula, Belize

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### **PCSD Comments on Proposed 210-slip Marina at Copal Beach and The Placencia Resort and Residences 28 July 2009**

Following are the comments of the Peninsula Citizens for Sustainable Development (PCSD) on the Placencia Marina (the “Marina”) proposed by Placencia Marina Ltd., a Belize limited liability corporation owned by Romas Ltd., a British Virgin Isles company that also owns the Placencia Hotel (the “Developer”) and the Marina’s Environmental Impact Assessment dated June 2009 (the “Marina EIA”) by Natural Resource Consulting (the “EIA Consultant”).

#### **Cumulative Impact:**

**Can the Placencia Peninsula Sustainably Support – or Need - 610 boat slips?** The 210 slips proposed by the Developer would be located less than 2 miles from the 400 slip marina already approved by the Belize Department of the Environment (“DOE) and the National Environmental Appraisal Committee (NEAC) in 2006 as part of the Ara Macao Resort (“Ara Macao”).

The Environmental Compliance Plan for Ara Macao (the “Ara Macao ECP”) explicitly states that if the Ara Macao project did not “commence” within one year from the date the Ara Macao ECP was signed, approval became null and void.

Almost three years have now passed since the Ara Macao ECP was signed and yet DOE steadfastly maintains that the Ara Macao project HAS commenced because Ara Macao is “working on its designs.”

Therefore, under the authority of the DOE, Ara Macao is still a live project, and its 400 slip marina must be taken into consideration when determining if the Peninsula can **sustainably support** another 210 boat slips – *for a total of 610 boat slips in just two marinas located within a 1.5 mile area.*

While the Peninsula Road is being paved over a portion of the approved location of the Ara Macao marina, this does not mean that the Ara Macao developer cannot move the road at a future date. Further, even if the current Ara Macao developer does not have the funds to construct the Marina, that doesn’t mean that another developer won’t in the future. DOE has stated that ECPs are non-transferable (even though the ECPs themselves don’t restrict transferability and under British common law, if transferability is not specifically prohibited, then transfers are allowed.) In any event, if the current Ara Macao developer simply sells its company, Ara Macao Development Ltd., no transfer of the ECP will occur, and a new owner of Ara Macao Development Ltd. can simply step in and build the 400 boat marina.

In addition, the determination of whether a 210 boat marina is sustainable for the Peninsula must take into account the other marinas and docking facilities that already exist or are being constructed in the Peninsula area –the Peninsula Club, the Placencia Yacht Club, Laru Beya, Robert’s Grove, the Kitty Fox/Ran Villanueva marina development near Los Porticos, and possibly at Coco Plum.

We do not believe that this number of boat slips is economically, environmentally, culturally or socially sustainable – such a large amount of boat traffic would overrun our fishing grounds, greatly over-tax our marine protected areas (none of which were even mentioned in the Marina EIA), destroy vitally important sea grass beds, other marine habitat and coral, and ruin the aesthetics that draw so many people to the Peninsula area.

As an example, Laughing Bird Caye is already above its carrying capacity during the prime tourism months of January – June when most boaters will want to visit Belize. What would this number of additional boats do to it – even if only half or a quarter of the 610 (or 210) slips were used? Further, fishing grounds are already under extreme pressure here as they are in the rest of the country. Can Belize really approve a 210 slip marina for the private profit of a few with little given back to our area, or Belize as a whole, since the majority of food and materials will be imported and little employment will be generated – *only 20 jobs for the proposed Marina.*

**What is the Cumulative Impact of the Marina, Copal Beach, The Placencia Hotel and Residences – and a casino and golf course?** The Marina EIA treats the environmental impact of the Marina as if it were happening in isolation. However, the Developer would have no interest in a marina that did not directly benefit Copal Beach, The Placencia and Rendezvous Caye -- and the Marina EIA does treat all four projects as being the same “resort” when it wants to boast about the number of jobs that will be created and the travel industry training it will provide. But, the Marina EIA carefully treats the Marina as a separate project having nothing to do with the other three (3) developments when discussing purely environmental issues.

No EIA was required for Copal Beach, despite its size and location. Therefore, we know little about it except that it will consist of six 5-to-6-story buildings (the highest on the Peninsula and greatly exceeding the 3-story limit that supposedly is in effect for the Peninsula), with 120 “units”. However we don’t know how many bedrooms will be in each “unit” – the ECP doesn’t say, and DOE says it doesn’t know. So, we have no basis on which to calculate water usage, the amount of garbage, sewage and traffic that will be generated, the amount of electricity that will be used, the number of employees who will work at the resort, the capacity of its sewage treatment plant, etc.

Before the impact of the Marina can be assessed, the cumulative environmental impact on the entire Peninsula of all three existing or in-progress developments in concert must be assessed since they will all be a part of the same complex.

Further, as relayed in a letter to the editor in the 19 July 2009 edition of The Reporter, PCSD has received a series of emails from a Canadian woman who told us that the Marina Developer is scheduled to speak to her investment club in September regarding his Placencia Peninsula project, including Copal Beach, The Placencia, Rendezvous Caye, a marina, casino and golf course.

In addition, employees at The Copal Beach site have told visitors that the building currently under construction *is the casino.*

*We fear that the Developer is piece-mealing a very large resort in an effort to gain separate approvals of each component to avoid the public outcry that would occur if all approvals were asked for at one time as part of one resort. We ask that you not allow this to happen by ascertaining NOW what the future development plans for this area are.*

### **History of Developer's Compliance with Environmental Regulations and Contractual Obligations to the Government of Belize at Other Projects.**

Just a couple of examples should suffice to illustrate the Developer's willful failure to comply with the law and its lack of respect for environmental regulations and its contractual obligations to the people and government of Belize.

As a Director of Rendezvous Island Limited, Marco Caruso signed the ECP for Rendezvous Caye off the coast of the Placencia Peninsula. Marco Caruso is also a Director of The Placencia Land and Development Company, the developer for Copal Beach Resort and The Placencia Hotel and Residences. He is also an agent of the Developer and represented the Marina at the Public Consultation. Therefore, Mr. Caruso is clearly involved with all four projects.

Under Mr. Caruso's watch, the development of Rendezvous Caye clearly did not comply with the Rendezvous Caye ECP. Section 1.0 of the Rendezvous Caye ECP specifically approves a BURIED seawall of approximately 3,000 feet at Rendezvous Caye, and Section 3.02.4 of the Rendezvous Caye ECP also requires the seawall to be buried.

The Developer willfully and wantonly disregarded the Rendezvous Caye ECP mandate and constructed an above-water seawall that is clearly visible in the video of Rendezvous Caye that is posted on You Tube at <http://www.youtube.com/watch?v=cukM-XWgLA8> PCSD made a formal complaint to DOE about the seawall by registered letter dated 29 April 2009. (According to a letter from DOE dated 7 July 2009, DOE inspected Rendezvous Caye on 6 May 2009, but has taken no action other than a letter dated 1 June 2009 (almost a full month after its inspection) to the proprietors of Rendezvous Caye to inform them of the findings of the inspection and to request that certain information be submitted to DOE. We are not certain how long DOE intends to wait for the Rendezvous Caye developer's response – it's now been almost 2 months since DOE wrote to the developer and almost 3 months since DOE made its inspection.)

Section 4.09 of the Rendezvous Caye ECP provides that all permits and licenses issued for the Rendezvous Caye development may be revoked for wanton disregard of the requirements of the ECP. We find it difficult to believe that someone could "accidentally" construct an above-water seawall, which means that the developer of Rendezvous Caye must have acted willfully and wantonly in purposefully constructing it in violation of the Rendezvous Caye ECP.

Further, attached to these comments is an aerial photograph of the Copal Beach Resort development just north of the proposed Marina. This photograph shows a large area of mangroves completely stripped away on the Lagoon side of the Copal Beach development, extending down past the proposed Marina to The Placencia Hotel and Residences. Were permits obtained to remove this mangrove? We know that the developer of Copal Beach did not have a permit to construct the groyne shown in the picture or to move sand from the beach, as he was observed doing by local residents.

Should people and organizations demonstrating such a lack of regard for Belize's environment and its laws be allowed to continue to develop in this country?

**Less Intensive Development:** Sections 14. 2. 1 and 14.2.2 of the Marina EIA itself recognize that a less intensive pier development is a better environmental option than a full-fledged marina (the the major downside to a pier development being the smaller economic gain to the Developer):

Technical but not economic merits were overall, the stronger arguments for this option, as described in Table 19. Technical merits include the allowing for a lower density use of the marine area that would only serve small number of vessels. This would greatly facilitate planning for infrastructure, logistics for construction and would also decrease the demands for centralized services such as water and sewage facilities.

Post construction services, maintenance and overall management would also be facilitated by a lower density development.

Environmentally and Ecologically Alternative B, the pier option has been found to be a good alternative since less area would be impacted.

Ecological benefits of alternative B stem from the fact that a reduced use of resources would be required due to the smaller development anticipated as opposed to the larger marina option. Similarly, the carrying capacity is favored by a smaller development. Any low impact development would place less strain on the existing sites, as well as the overall ecological resources of the site.

**Water Resources:** The Marina EIA is deficient in information provided about water resources and does not comply with the Terms of Reference for the Marina EIA (*TOR Section A, 1.04a (specifications for water treatment facility not provided); Section B, 2.02 (layout plan for water pipes including route, depth, type of piping and methodology not provided); Section B, 2.03(baseline water quality assessment of ground water and surface waters of the project site and zone of influence collected in dry and rainy season not provided – no water analysis provided except for sea water), Section B, 2.04 (inventory of other water users in zone of influence and possibly deleterious effects on other users not provided). See Part 5 of the Marina EIA.*

**Desalination Plant.** The Marina EIA states that 75% of its potable water will come from a desalination plant and 25% from some other water resource. However, the EIA Consultant at the public consultation for this project held in Seine Bight on 16 July 2009 ("Public Consultation") stated that a desalination plant *might* be required. The purpose of an EIA (not an LLES, which we fear this document really is) is to set out definite components of a proposed development so that they can be substantively reviewed by the public, DOE and NEAC. Therefore, the review of the proposed Marina EIA must assume that the Marina EIA is the authoritative source of the Developer's plans for the Marina. Unfortunately, the Marina EIA is extremely deficient in its water source information in part because it provides almost no information about the water desalination plant, such as:

- Where the plant will be located;
- Whether it will extract Lagoon water or sea water and where the extraction point will be;
- Where the brine and other waste will be deposited;
- What the specifications for the plant are (specifications will be very different for water abstraction from the Lagoon as opposed to abstraction from the Sea);
- Where the injection well will be located;
- Energy sources – whether the amount of energy projected for the Marina includes the energy needed for the desalination plant. (This is very important because desalination plants are very energy intensive.);
- What desalination method will be used; and
- How and when will maintenance be conducted.

**“Other” Water Resources.** The Marina EIA also states that 25% of the water for the Marina will come from other sources. WHAT other sources? Where will the water be extracted, how will it be pumped, where will the pump and lines be located, what is the quality of the water and does it come from the same water source that provides water to the rest of the Peninsula?

The Copal Beach Resort EIA states that water for that resort will be from the Placencia Village Water System. Is this possible, and if it is, why would the Developer decide to use a desalination plant and water from “other resources” if municipal water is available nearby? Where will Copal Beach’s water actually come from? What is the water source for The Placencia? Will the water source for the rest of the Peninsula be used by Copal Beach and the Marina? (The Placencia Village water supply does not extend to the area of Copal Beach, The Placencia and the Marina. Therefore, we are at a loss to determine how the Copal Beach ECP could have been approved with the water source for the Resort coming from the Placencia Village water supply.)

**Dredging:** As with the water source and treatment information provided at the Public Consultation, the EIA Consultant contradicted the Marina EIA with respect to dredging. The Marina EIA states that the sand needed to fill the geo-tubes (100,000 cubic yards) will be dredged from the area where the Marina will actually be located. (*See page 10 under Dredging and Sections 9.4 and 9.7 of the Marina EIA.*) Further, all Marina EIA dredging discussions concern dredging in the Sea. . (*For examples, see Marina EIA Section 15.3 - dredging said not to harm sea grass beds, Section 15.15.1(a) – mitigation measures for dredging in the sea to be the use of silt curtains, dredging in calm seas and dredging of “only” 20 acres to a depth of 3 feet.*)

However, at the Public Consultation, the EIA Consultant stated that the Placencia Lagoon will be dredged for the sand to fill the geo-tubes. If the dredging is proposed to be in the Lagoon, then the Marina EIA contains absolutely no assessment of this dredging including effect on sea grass beds, marine life, birds and reptiles and animals in the Lagoon (specifically including endangered West Indian Manatee and endangered Morelet Crocodiles), or the composition of the materials to be dredged.

The issue of where dredging will occur is a major one. The Placencia Lagoon in the area of the proposed Marina used to be lush with sea grass favored by manatee but has been severely impacted by the dredging for The Placencia Hotel and Residences. That sea grass is just beginning to make a come-back, but will again be killed if dredging in the Lagoon to the extent of 100,000 cubic yards is allowed. (Note: while silt curtains presumably should be used for all dredging in the Lagoon, they never are, and we have no reason to believe that DOE could enforce the use of silt curtains since it does not appear to have been able to enforce their use at other locations such as Rendezvous Caye.)

Further, the extremely adverse effects of continuing to allow so much dredging in the Placencia Lagoon are not felt just by manatees and sea grass.

The function of the Lagoon is as a fish and marine life nursery, and requires *shallow* clean water and places to hide for juvenile fish and marine life (not big holes that “the fish like” as has been “explained by an employee of the Department of Geology). The amount of dredging and mangrove clearance that has already been allowed in the Lagoon is destroying the nursery function of the Lagoon – and will eventually destroy our marine fisheries. Then all those wealthy yachtsmen won’t be able to come, spend some money and “catch a few lee fish” as Minister Melvin Hulse put it at the Public Consultation. There won’t be any fish for them to catch. Nor will any of those big fishing boats the Developer hopes to attract be interested in coming here.

Basically, dredging the Lagoon for a marina in the Sea seems to be a clear instance of shooting oneself in the foot – loss of marine life through destruction of habitat – marine life that draws people to the area; destruction of the nursery for the area’s fisheries, which also draws tourists to the Peninsula.

Unless, of course, the Developer is not interested in attracting the type of tourists who sustain the rest of the Peninsula’s hotels, tour operators, guides, gift shops, restaurants, etc. And if that’s the case, approval of this Marina and approving activities that destroy what the rest of the Peninsula population depends on for its livelihood would seem to clearly illustrate a preference for the Developer and its associates over the rest of the Peninsula population, including its native born Belizean population.

The worst of both worlds – destruction of Lagoon’s ecology AND destruction of Sea ecology, especially when combined with the dredging that could possibly occur at Ara Macao at the same time as the dredging at the proposed Marina.

In addition, although information about maintenance dredging, specifically frequency and volume, is required by Section 6.02.15 of the Terms of Reference, maintenance dredging and its impact are not discussed at all in the Marina EIA other than references to maintenance dredging in Table 14.2, page 100 and a reference to maintenance dredging of a littoral area leading to mangrove loss and siltation in Table 15.2 – why mangrove loss will occur 300 feet off the sea coast is not explained.

Further, baseline information about marine wildlife and especially benthic species is very weak. The Marina EIA says “no benthic subsurface invertebrates were immediately apparent” and that “a few echinoderms” and “no benthic species were observed.” (page 27 of Marina EIA) ***Baseline information should include sources, studies, description of methods to support such statements.***

Also, dredging the coast would have significant impacts on marine wildlife. Empirical studies indicate that as much as 30% of total fisheries’ yield for human food is derived from benthic resources, and these become increasingly important component of the food web in near-shore waters where primary production by sea grasses living on the sea bed largely replaces that of the phytoplankton in the water column.

The impact of dredging activities mainly relates to the physical removal of substratum and associated organisms from the sea bed along the path of the dredge head and partly on the impact of subsequent deposition of material. (Newell, 1998, *The Impact of Dredging Works in Coastal Waters: A review of the sensitivity in disturbance and subsequent recover of biological resources on the sea bed*, Oceanography and Marine Biology, an Annual Review, 36:127-78. UCL Press)

**Sewage:** The EIA is deficient and does not comply with the Terms of Reference with respect to sewage information. (*TOR Section B, 3.02- fails to identify at least two different options for waste disposal, Section 3.01 – fails to determine the nature and volume of all liquid waste to be generated, including bilge water.*)

The Marina EIA states that sewage treatment will be done by an “enlarged” sewage treatment plant at The Placencia. Enlarged by how much? Where will the additions to the sewage treatment plant be located? Has any monitoring ever been done of the system as it currently exists to determine whether it is being operated properly and has sufficient capacity for its existing use? (People on the Peninsula routinely roll up their vehicle windows when passing The Placencia when the irrigation system is on because of the stench, indicating that something is “rotten” at The Placencia.)

No other sewage option was identified.

Further, treatment of bilge water is not even mentioned in the Marina EIA. How will bilge water be handled and how will it be treated? (Bilge water is quite different than 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.) Do the plans for the Marina include a bilge water pump out station?

**We recommend that all marinas in the country be required to comply with *Blue Flag* standards for marinas and that Belize become a part of the *Blue Flag* program for marinas.**

<http://www.blueflag.org/Menu/Criteria/Marina+Criteria>

**Solid Waste.** The Marina EIA is deficient and does not comply with the Terms of Reference with respect to solid waste disposal. (*TOR Section B, 4.01, fails to identify different types of wastes that will be generated; Section B, 4.02, fails to identify at least two different options for solid waste management.*)

The Marina EIA does not address hazardous wastes as a significant component of marine wastes such as used batteries, solvents, marine paint, antifreeze, alkaline salts, detergents, petroleum additives and oil. These are dangerous substances and should not be merely dumped into the Placencia dumpsite where these substances can leach into the ground water. Batteries should be recycled (possible in Belize City) and other hazardous wastes must be contained in an impervious storage container before safe disposal.

The Marina EIA does state that Belize has no hazardous wastes treatment facilities. Perhaps that in and of itself is enough to deny approval of this project. Is this Marina really so important that the government will sacrifice more of the lives of its citizens through ground water contamination and exposure to deadly chemicals in substances such as marine paint and marine batteries? Or, perhaps the Developer should be required to establish a hazardous waste treatment facility as a condition for any approval of any marine berthing facility.

Only one option for solid waste disposal was identified in the Marina EIA.

No solid waste management plan or clearly defined management and final disposal methods were provided.

**Fuel:** The Marina EIA does not include a plan for oil spills, but merely states what equipment will be available to mitigate a spill, but not how marina personnel will respond to oil spills. No mention is made of automatic back pressure shut off for the fuel pump nozzles.

## Social Factors:

- **Placencia Village.** Once again, Placencia Village is not identified as an affected community despite the fact that it is downstream of the Marina, so whatever happens there will eventually make its way downstream – sand starvation, oil spills, trash, bilge water and sewage spills. These will happen no matter what plans are put into place to avoid them because some day someone will be careless or a piece of equipment will malfunction. Therefore, the impact on Placencia Village must be addressed to adequately assess the impact of the Marina on the local environment. (The impact of the Marina was assessed for Sagitun Farms, approx. 8 miles from the proposed Marina – approximately the same distance from the northern end of Placencia Village. In addition, Sagitun, San Roman and Santa Cruz, all identified as “affected communities” and within the “zone of influence” for the proposed Marina, are UPSTREAM from the proposed Marina, which insulates them from spills, erosion, etc.)

Further, the kind of development occurring in the Copal/Placencia Hotel/Marina area will deleteriously impact the tourism base of Placencia Village – tourists who are interested in nature, marine life, eco-tourism, Belizean culture and actually spending time somewhere that doesn't look like South Florida. The number of boaters this proposed Marina will bring will also negatively impact small, locally owned Belizean businesses such as Tarpon Caye Lodge, Whipray Caye Lodge, French Louie Caye - - especially when boat traffic between the mainland and Rendezvous Caye is added into the mix. In fact, these combined developments may actually drive away Placencia's tourism base, depriving local Belizeans of their livelihoods. And, 20 jobs at a marina cannot compensate them for this loss, especially when these combined developments give nothing back to the community such as no assistance with garbage, sewage, hazardous waste disposal, significant employment, police or fire protection, education, etc.

*Laughably, the Developer actually has the temerity to state in the Marina EIA that this general location on the Peninsula “is rapidly developing a high density commercial zone servicing the hotel industry.” This is laughable since the Developer is itself responsible for the high density – and its almost certain negative impacts on the rest of the Peninsula.*

- **Police and Fire Protection:** The Marina EIA states that no additional police protection will be needed because the hotel sites in the area are already patrolled by private security. Unfortunately, people living on the Peninsula are not worried about security on the site itself. We're worried about the crime that will come with an increased transient population, as has been the case with most developments on the Peninsula. Our police department is already over-taxed and can barely handle the existing level of crime, much less an increased one.
- **Schools, Medical Care:** The Seine Bight and Placencia schools are bursting at the seams from new arrivals to the area – families who came with construction workers. The Placencia school is trying to raise the money to add a second story to an existing building, and both schools are at capacity. How will the school system handle even MORE new children that come with this new construction? Medical care is limited to one doctor in Placencia Village and 2 nurses. How will medical care be provided to an increased population?

- **Should small villages such as Placencia and Seine Bight be forced to somehow finance the cost of infrastructure such as schools, medical care and waste disposal that are direct results of new developments that bring money to their investors and none to the local community coffers?** How can approval be given for such projects when local communities have no ability to tax these developments or their owners to help mitigate the burden these developments impose on them?

**Carrying Capacity of Local Tourism Attractions:** The Marina EIA fails to even mention the primary tourist attractions for the area – Laughing Bird Caye, Gladden Spit, the Silk Cayes, Monkey River, but instead, inexplicably, focuses on Sittee River and Cockscomb. Why? Perhaps the Developer does not want to admit the severely negative impact this number of boats and passengers will have on these areas, much less the cumulative impacts of the Placencia Resort and Residences, Copal Beach, Rendezvous Caye and the proposed Marina.

**Fencing:** The Marina EIA states that in order to contain the construction of the breakwater, the Developer proposes to construct a "temporary fence" (it says temporary but does not define a timeframe) around the entire breakwater site. This fence would be held in place by *pressure treated timber piles* at 25 foot intervals, which would support 12 to 18 feet tall chain link fencing over the seabed to control turbidity and other construction debris for the duration of the project."

The Marina EIA does not include detailed information about the pressure treated timber. Chemical preservatives used to pressure-treat timber are classified as pesticides. There are different categories of chemical preservatives that involve the use of substances that would affect negatively marine wildlife such as chromate copper arsenate (CCA), organic solvents, oils and others. This aspect of using pressure treated wood has been overlooked in the Marina EIA.

**Disaster Management:** The EIA completely fails to address disaster management after an earthquake, a disaster we all now know the area can suffer. Sewage, water and fuel lines can all be pulled away from the pier and breakwater areas, releasing hazardous effluent into the Sea, the breakwater and the pier could be broken or destroyed, again releasing hazardous effluents, etc. And, an earthquake can't be predicted as is the case with a hurricane. What measures will be taken to ensure immediate mitigation efforts after an earthquake?

**NGOs, Local Organizations:** **The Marina EIA does not comply with the requirements of TOR Section B, 10.00, 10.01 – no local NGOs or local organizations were interviewed or contacted about the proposed Marina.** The Developer did not even make an attempt to contact SEA (f/k/a Friends of Nature) to adequately assess the impact of dredging on sea grass beds, marine life and manatee that frequent the area, the Placencia BTIA to discuss the proposed Marina and its effect on local businesses or the Placencia Humane Society to discuss effect on Peninsula wildlife.

**Marina Access:** Section 12, page 81 of the Marina EIA states that "Local users may be forced to stop using the area. Access to the area may be restricted by the use of barriers." Restricting access to the proposed Marina violates Belize law which requires marinas, piers, docks and other over-water structures to be open to the public from 9 AM to 6 PM.

**Protected Areas:** The discussion of protected areas in the Marina EIA completely fails to include ANY discussion of the marine reserves in the area that will be affected by the proposed Marina, including Southwater Marine Reserve, Gladden Spit Marine Reserve and Laughing Bird Caye National Park.

**The Marina EIA also fails to comply with other Terms of Reference in the following areas:**

- **Bathymetry:** The Marina EIA is deficient because no bathymetry data was provided for the access channel as required by TOR 6.03.
- **Management Structure:** The Marina EIA is deficient because no outline of the overall MARINA management structure is provided as required by TOR 1.06 (not Copal Beach or The Placencia management, but marina management).
- **Energy Generation:** The Marina EIA is deficient because it does not assess the energy requirements for each of the construction, operation and maintenance phases of the proposed Marina as required by Section 7.03 of the TOR.

As demonstrated by the discussion above, the Marina EIA is incomplete. It does not substantially meet the requirements of the TOR for the Marina EIA and does not include enough vital information about issues including, but not limited to, dredging, source and quality of water resources, disposal of hazardous materials and liquid waste treatment to evaluate the environmental, social or cultural impacts of the proposed Marina.

The Developer's track record of compliance with Belize laws, regulations and contractual obligations also presents serious issues about the Developer's ability or willingness to comply with the same for this proposed development.

Further, we strongly believe that the Developer is attempting to piecemeal the approval of different components of an overall development plan that the Developer knows would meet strong opposition if all components were presented as one project.

Based on the above we urge that DOE and NEAC deny approval for the proposed Marina.

