



## Peninsula Citizens for Sustainable Development

General Delivery, Placencia Peninsula, Belize

[www.saveourpeninsula.org](http://www.saveourpeninsula.org) «» [info@saveourpeninsula.org](mailto:info@saveourpeninsula.org)

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28 July 2009

**Via Registered Mail, Fax and Email**

Martin Alegria, Chief Environmental Officer  
Department of the Environment  
Ministry of Natural Resources  
10/12 Ambergris Ave.  
Belmopan, Belize

Re: Proposed Marina Development at Copal Beach Resort and The Placencia Hotel and Residences

Dear Mr. Alegria:

Enclosed are the comments of PCSD on the proposed Placencia Peninsula 210-slip marina.

We urge that DOE and the National Environmental Appraisal Committee deny approval for the proposed Marina based, in part, on:

- Inability of the Placencia Peninsula to sustainably absorb 610 boat slips in an area of less than 2 miles;
- The developer's demonstrated very poor track record of compliance with Belize laws, environmental regulations and contractual obligations, particularly at Rendezvous Caye;
- The contradictory information provided at the public consultation for the proposed Marina and the information presented by the Marina EIA, particularly with respect to the areas to be dredged and water source and treatment;
- The small number of jobs created (only 20) that do not counterbalance the damaging environmental, social and cultural impacts on the Placencia Peninsula, especially when visitors to the Marina will be kept in the Marina area at Copal and The Placencia for restaurants, shops and supplies, excluding small businesses on the rest of the Peninsula;
- The failure to assess impacts on Placencia Village by excluding it from the "zone of influence" when Placencia Village is downstream from the proposed marina, unlike other upstream communities considered within the zone of influence, such as San Roman and Santa Cruz;
- The very serious impacts of dredging on the Placencia Lagoon, if dredging of the 100,000 cubic yards of sand needed for the geo-tube construction of the marina is planned to be in the Lagoon, as stated at the public consultation, but contradicted by the EIA.

- Recognition by the Marina EIA itself in Sections 14.2.1 and 14.2.2 that a less-intensive pier is a much better environmental option:
- The incompleteness of the Marina EIA, which does not substantially meet the requirements of the Terms of Reference (“TOR”) and does not include essential information about issues associated with dredging, source and quality of water resources, disposal of hazardous materials and liquid waste treatment, social impact and environmental impact on marine protected areas such as Laughing Bird Caye National Park, the Southwater Marine Reserve and the Gladden Spit Marine Reserve.

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

Therefore, we urge that approval of this proposed Marina be denied.

Sincerely,

Peninsula Citizens for Sustainable Development,  
Ltd.



By:

Mary Toy, Co-Chair

cc: Placencia BTIA  
Southern Environmental Association  
Placencia Peninsula Tour Guide Association  
Placencia Peninsula Tour Operators Association  
Monkey River Tour Guide Association  
Belize Association of Conservation NGOs  
Seine Bight Village Council  
Placencia Village Council  
Monkey River Village Council  
Belize Association of Conservation NGOs

The Reporter  
The Amandala