



Peninsula Citizens for Sustainable Development

General Delivery, Placencia Peninsula, Belize

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Via Email, Fax and Registered Mail

Department of the Environment
10/12 Ambergris Ave.
Belmopan, Belize

Re: The Placencia Resort

Dear Environmental Officer:

The proposed Placencia Resort at the site of the former Luba Hati Resort is a welcome change from the many developments previously approved by DOE for the Placencia Peninsula -- with or without the benefit of an EIA.

And, we very much commend the developer's recognition of serious development issues affecting the Peninsula including:

- Potable water supply and the developer's commitment to obtain its primary water supply from the Lagoon (with treatment of the water by reverse osmosis to purify it for use as drinking water)
- Solid waste disposal and the developer's commitment to reduce by over 50% the amount of solid waste that will be sent to the Peninsula dump site through "smokeless" paper incineration and organic waste composting
- Recognition that Belize does not have a toxic waste disposal site or system and the developer's commitment to packaging of toxic and hazardous wastes to reduce the likelihood of water and soil contamination
- Limiting the height of structures to two stories to preserve the tree line and aesthetics of the Peninsula
- Cumulative impact of the development with respect to water and garbage issues addressed above

However, we do have some concerns about the development that need to be addressed by DOE and the developer, specifically:

- **Number of boats and boat slips:** The project includes approximately 150 wet boat slips and 50 dry slips -- basically one boat slip per unit. All slips will be in the Lagoon and may significantly increase boat traffic in the Lagoon by much more than the .1% increase claimed by the EIA -- even if only ¼ of them are used at one time. Only Robert's Grove operates heavy boat traffic in the part of the Lagoon in which the development will be located (and exposes manatee to higher collision risk in that area). Most of the boat traffic in the Lagoon runs between Mango Creek and Placencia. Therefore, if estimates of increased boat traffic numbers are based on a percentage of total boat traffic in the Lagoon, the impact from increased boat traffic from the proposed resort will be much greater than reported in the EIA.

We understand that the developer did not know that the EIA requests approval of 150 boat slips and thinks that 50 slips is a more appropriate number. If this is true, the number of boat slips approved should be limited to 50 or fewer.

In addition, we believe that Belize issues captain's licenses only to permanent residents and citizens of Belize. Therefore, tourists using the resort will not be able to captain their own boats – and how many will want to ship a boat to Belize that they cannot use without hiring a licensed captain (of which there definitely are not enough locally to captain even 50 boats).

In addition, even if this regulation were changed and tourists were allowed to take the captain's license test and obtain a captain's license in Belize, how many tourists will be staying at the resort long enough to complete the licensing process? Therefore, based on Belize's captains licensing requirements, not even 50 slips are needed at the proposed development.

- **Wastewater Discharge into the Caribbean.** We understand that wastewater discharge must go somewhere, and according to marine biologists familiar with the Placencia Lagoon, the Lagoon cannot handle any additional discharges. Therefore, the Sea seems to be the only body of water available to receive wastewater discharge. However, the EIA does not clearly address how much, how and where the waste water will be discharged into the Sea and this aspect of discharge is critical – we would like more information on this issue, and frequent independent monitoring required.
- **Ownership of Houses (Residences) and Suites.** The resort characterizes itself as a “residential tourist” development. The EIA also states, “The management entity responsible for the entire development will be Plexar Capital, LLC. Individual development components however, are anticipated to be contracted out to professional operators who have extensive experience in residential tourism developments, and who will otherwise be responsible for day to day operations.” Will the developer retain ownership of houses and suites or will they be sold to individual owners? If they are to be sold, what type of operating covenants will be put in place to restrict future development of individual properties, such as construction of larger pools, more slips, additional parking, etc. If the houses and suites will be sold, will they be sold as time-shares, condominiums, or as cluster housing? We would like more information on this issue.
- **Overpass.** Absolutely no details are given about this proposed overpass, not even basic details such as approximate height and length. We understand from conversations with prior property owners and the developer that the resort property has about 1,000 feet of road frontage (information not provided in the EIA) and that the overpass/underpass will be approximately 800 feet long – or 80% of the road frontage. This is certainly larger than is described in the EIA, which states that the small overpass will be in the “middle” of the property. (See attached rendering of overpass found in the first addendum to the EIA.)

We have a number of reservations about this “overpass”:

- **Safety:** Large construction trucks and trucks hauling entire Mennonite houses will have to use the overpass along with regular vehicular traffic. Passenger vehicles regularly have to pull off the side of the Peninsula road to avoid collisions with these large construction trucks and Mennonite houses – how wide will the overpass be? Vehicles also routinely run off the Peninsula Road due to defective tires (extremely common), driver inebriation, etc. How high will the guardrails be on the bridge – how high do they need to be to prevent a construction truck

with a blown tire from going over the side? How will this affect the aesthetics of the bridge? The EIA suggests that pedestrian and bicycle easements will be available on the ground level, but gives no details about these easements, nor promises to install them.

In addition, Placencia routinely is subject to 20-25 knot per hour winds even in non-hurricane season. Crosswinds generated by 20-25 knot per hour winds at an elevation of 18 feet can easily overturn lightweight high vehicles such as the Sidewinders regularly driven by tourists, not to mention trucks with heavy (and volatile) upper weight loads such as butane and petroleum trucks.

Will a vehicle blown over by crosswinds, or a large construction truck with a blown tire or mechanical failure, be able to completely halt traffic in or out of the Peninsula by blocking both lanes of the bridge? This is a critical issue in for the Placencia Village community -- such as transporting local medical emergencies to the regional Dangriga hospital (e.g., heart attack victims and pregnant women) -- and hurricane evacuation. Also, we believe that the bridge will need to be built to withstand a cat 5 hurricane.

Perhaps a pedestrian and golf cart overpass over a small portion of the road (rather than along the road itself) would be a better solution.

- **Cultural/Aesthetics:** An overpass 18 feet high and 800 feet long effectively acts as a wall between the resort and local people traveling on the road. Plus, an overpass on a road in the condition of the Peninsula road is incongruous – and inappropriate given the character of the Peninsula. We understand that the developer’s resort consultants have advised the developer that the existing ground level road will deter prospective guests (and possibly purchasers if the residences and suites are to be sold). That may be, but an overpass on the Peninsula road is still completely out of character with the Peninsula, and we strongly urge that it not be approved.

We also note that at least two other Placencia Peninsula resorts have resorts areas separated by the Placencia Road - The Inn at Robert’s Grove and Bella Maya.

- **Employee Housing:** The EIA anticipates that employees will be hired from the local Peninsula work force. However, as pointed out at the public consultation, the local workforce is already too small to handle existing employee requirements on the Peninsula. Therefore, employee housing – and an increase in density -- will have to be provided at the property. Where will the employee housing be located?
- **Length of Pier:** A 100 meter pier is quite long and increases the probability of the pier causing erosion of beaches to the south. We would prefer that this pier be shortened.
- **Density:** Although the overall per unit density of the proposed resort is fairly low, the resort will have a total of 331 bedrooms, with the majority (214, or about 65% of the rooms) being located in the mangrove, island and garden residence areas, which impacts significantly on mangroves and Lagoon habitat in this area. The densities in these clusters should be reduced.
- **Parking:** Given the number of units proposed and the fact that most can only be accessed from "golf cart trails", it would seem that the parking proposed is inadequate to fully serve the site.

- **Sediment and Erosion Control:** The EIA discusses sediment and erosion control following construction in a general manner. However, the EIA provides little to no discussion on sedimentation and erosion control for the construction period when the site's vulnerability to major problems is highest

For example, while silt screens are proposed around the suction dredges, the EIA does not include any measures to control sedimentation from run-off after the dredged material is placed on land – and with heavy rains, run-off could create a major sedimentation problem.

- **Hazardous Materials Storage:** Storage of hazardous materials (e.g. petroleum products) is addressed by simply stating that containment equal to 110% of volume will be provided. However, there is no discussion of what happens to the material in the event of a leak or spill. A spill prevention, control and countermeasure plan describing the actions to be taken and the disposal plans should be required.
- **Water Quality Monitoring:** Monitoring of water quality during construction should be required.
- **Water Supply:** The EIA does not include any information on the water supply for fire fighting. Also, water usage for residential use tends to be over a 16 hour day (not the 24 hours used) and generally has a peaking factor of at least 3.0 applied to it for peak demand. This results in a peak demand of 260gpm (excluding fire demand) and brings into question the adequacy of the proposed system to meet that demand.
- **Composting:** Composting waste, including sewage sludge, in sand with a shallow water table will likely result in pollution of the ground water and the Lagoon. Composting, especially of sludge, should be done in lined pits and the leachate collected for treatment.
- **Fire Fighting:** In addition to the failure of the EIA to address water supply for firefighting, it does not include any detail on fire fighting equipment and does not indicate that sprinklers will be installed in suites and residences – which they should be. If sprinklers will be installed, what types and how will they be supplied? The EIA also does not discuss mention an on-site standpipe.
- **Traffic:** The cumulative impact section of the EIA does not address the cumulative impact of increased traffic that will result from occupancy of the resort and all other existing and recently approved resorts. As we have pointed out in all comments on EIAs, the road is already inadequate for existing traffic. In addition, the cumulative effect of all of this increased traffic puts Placencia residents in dire jeopardy in the event an evacuation is required – especially if a two-lane bridge is involved.

Thank you for your attention.

Sincerely,

Peninsula Citizens for Sustainable Development,
Ltd.



By: Mary V. Toy, 1st Vice President

Rendering of Overpass in Addendum to Placencia Resort EIA



Proposed Overpass on Placencia Road - The Placencia Resort
(from page 91 of Part 7 of EIA)