

January 10, 2023

Ms. Debbie Reyes
Managing Director,
ECOENGINEERING CONSULTANTS LIMITED
62 Eastern Main Road,
St. Augustine,
TRINIDAD

RE: APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL CLEARANCE (CEC6451/2022) –THE ESTABLISHMENT OF A 200 ROOM HOTEL, BUNGALOWS, VILLAS, PRIVATE RESIDENCES AND OTHER ASSOCIATED FACILITIES ON 11.99 HECTARES OF LAND AT ROCKY POINT, SHIRVAN ROAD, MT. IRVINE, TOBAGO

Dear Ms. Reyes,

We have reviewed the Draft TOR for the captioned CEC Application and would like to submit the following comments.

In our opinion, the Draft TOR is largely adequate and relevant to the proposed project. We think everything that has been captured is important and we would not agree with the removal of any items.

We note in the letter from the EMA dated November 10th 2022, that a request has been made for the removal of Designated Activities (DAs) 13(c) and 41(c) from the list of applicable DAs identified in the Preliminary Draft TOR and that the EMA indicated that removal of any such DAs must be done following the conduct of the Stakeholder Consultations on the Draft TOR, which would provide the opportunity to confirm that these DAs are indeed not applicable. We note that no information has been provided by the applicant to demonstrate that these DAs are not applicable and therefore we recommend that they should remain a part of the TOR.

We have the following specific suggestions:

Pg 2, Legal Framework

- The title of Designated Activity #40 is missing

Pg 8, Annex 2, Applicable Standards and Guidelines

- The following Acts, Policies or Plans are not listed and we recommend these are relevant and should be included:
 - The Forests Act
 - ICZM Policy
 - National Wildlife Policy 2013
 - National Protected Areas Policy 2011
 - National Biodiversity Strategy and Action Plan

Pg 9, Annex 2, Applicable Standards and Guidelines

- The following relevant International Conventions should be included due to their relevance to the conservation and management of sea turtles:
 - Cartagena Convention, Protocol Concerning Specially Protected Areas and Wildlife (SPAW)
 - Inter-American Convention for the Protection and Conservation of Sea turtles (while T&T have not yet acceded to this convention, steps are being taken in this direction - a Draft Cabinet note has been submitted to the Minister of Planning and Development for approval and submission to Cabinet)

Pg 12, Section 3.4 (a)

- Maps illustrating the topography of the site and the location and extent of any clearing, grading or filling works should be required.
- Maps illustrating the position of native vegetation across the site, especially along the coastal edge, and indicating which vegetation is earmarked for removal and which vegetation will be left intact should be required.

Pg 14, Operation and Maintenance

- Details of landscaping such as the proposed species and locations should be provided, due to the potential impact on habitat quality, especially along the coastal edge of the site.
- Details of any temporary or permanent structures or items such as beach chairs should be indicated including numbers and location and management of such items.
- A description of any proposed beach maintenance procedures (such as cleaning) should be required.
- An estimate of the number of beach goers should be required, to inform the assessment of their impact on the beach.

Pg 17

- Description of the anticipated sources of light from the proposed project should specify the number and location of lights, and characteristics of each such as wattage and wavelength, height, any shielding etc.

Pg 21, Section 5.5.1.3 Coastal Processes

- We recommend more specifics should be required such as:
 - An assessment of the annual variation of wave and current characteristics as they relate to the potential to impact the project's activities, including constraints on recreational use of the beach, and impacts to safety of beach users. This should also address the potential for extreme events such as Tropical Storms/Hurricanes and seasonal events such as swells.
 - A description of patterns of erosion and accretion, the nearshore bathymetry
 - Natural hazards and/or climatic conditions that may impact the safety of beach users and impose constraints to recreational use

Pg 24, Section 5.5.2 (b) and (c)

- Coral reefs are an important ecosystem in the area which should be specified.

Pg 35, Section 8.12.3

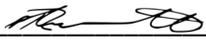
- Impacts to flora and fauna which should be assessed should include:
 - Removal of coastal vegetation
 - The potential impact on the beach and marine turtles from activity associated with hotel operation (in addition to light and noise which are mentioned), including sand compaction, presence of potential obstacles such as beach chairs etc., and any “cleaning” practices.

Pg 40-42, Section 9.3

- Several Management Plans are required including a Coastal Zone Management Plan (CZMP), however this only addresses the physical protection of the coastline. We recommend that management actions specific to the sea turtle nesting activity at the beach be captured, either within the CZMP or as part of a separate plan.

As interested stakeholders, we would also like to request that we be included in any further consultations on this CEC Application and EIA. If you have any questions regarding our comments please contact us at info@speseas.org or 868-689-SEAS(7327).

Sincerely,



Ryan Mannette
Corporate Secretary, SpeSeas



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Reference number: TBNGX-BN5VW-7S7WN-TNWD5

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Signature

Ryan Mannette

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