

Public Consultation Report for Bel Air Project

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Prepared by



36 Queen Street
P.O. Box N 1416
Nassau, The Bahamas
Tel: 242-825-5178 or 242-557-9416
Contact: Stacey Helena Moultrie
Email: hmoultrie@sevconsulting.com

Public Meeting for Bel Air Project

Thursday, 12 May 2022

Meeting start: 6:00 p.m.

The public consultation meeting for the Bel Air Project occurred via Zoom on 12 May 2022. A list of participants is provided in Appendix 1.

Dr. Rhianna Neely-Murphy, Director of the Department of Environmental Planning and Protection (DEPP) and Mrs. Gammell Deal, DEPP welcomed participants to the meeting and explained the format for the meeting. Prior to the meeting, the Environmental Impact Assessment (EIA) for the project was made publicly available at <http://belairbahamas.com>.

The EIA presentation was given by Stacey Moultrie of SEV Consulting Group. A copy of the presentation is provided in Appendix 2.

Mrs. Moultrie provided an overview of the project which is planned to be a resort and residential development in Gregory Town, Eleuthera. The project consists of two sites with the following components:

- Site 1 – Resort of 70 cottages and 44 residential homes
- Site 2 – Beach club with 20 – 30 cottages
- Green spaces
- Associated infrastructure

She discussed the significant impacts expected from the project. These included:

1. **Clearing of land** - Plants and trees will be moved, changing the habitats that exist on both sites.
2. **Construction** – It will impact how birds and other animals will utilize both sites. Noise levels generated have the potential to deter birds and other animals from utilizing both sites.

Mitigation measures to minimize or eliminate these significant impacts will include:

- Clearing will be minimized as much as possible to the footprint of new buildings.
- Clearing will be selective rather than bulldozing the entire area with protected trees being marked prior to construction.
- Native trees and plants will be maintained wherever possible, especially where they are clustered. Maintaining native plant species on the property is a measure to increase food resource availability for wildlife and support local habitat conservation initiatives and organizations, on the Island of Eleuthera and nationwide. The goal is

to maintain the clusters of plants and trees as vegetated corridors between the project sites and green areas outside the project site so that smaller animals (e.g. birds and lizards) can traverse them.

- Landscaping will utilize native and endemic plants and trees.
- No invasive plant species will be utilized in landscaping.
- Birds and other animals are expected to return to the sites when there is no active construction.
- When construction is active, there are vegetated areas neighbouring the sites that birds and other animals can utilize. 'Utilize' meaning for nesting, roosting (i.e. sleep or settle to rest) and foraging.

She also spoke about less significant impacts such as noise and impacts on neighbouring communities. She discussed mitigation measures for some of these as well. Details of mitigation for each impact topic are included in the EIA.

She outlined the next steps in the process which would include development of a report on the public consultation and an Environmental Management Plan (EMP). The EMP will be submitted to DEPP for its review.

She informed participants that they will have until Tuesday, 14 June 2022 at 5 pm to submit written comments. These comments can be sent to info@sevconsulting.com or inquiries@depp.gov.bs.

Mrs. Moultrie concluded her presentation. Participants were then invited to ask any questions.

Q&A:

Will Simmons (an environmental educator of over 15 years who has led youth programs such as camping, snorkeling and other nature-based activities and who is very familiar with the project site).

- **Comment:** Thank you to Mrs. Moultrie for the presentation and to The DEPP for reminding the public of their roles relative to their functions and mandate to ensure that The Bahamas remains compliant with their national obligations and multilateral agreements. Pleads for the level of transparency presented on this call is sustained as it is a matter of trust and critical importance.
- **Question:** Mrs. Moultrie's assessment briefly mentioned an endangered coral species but no reference to mitigation or protection of the boulder star coral. The renderings in the plan suggest substantial changes to the shoreline, however there is no indication of mitigation to the immediate coastline and seabed.

SEV Response: A boulder star coral was observed in the vicinity of the coastline, but it was not very close to where the dock would be located. The dock construction has no dredging

plan, only the installation of a few pilings. We determined it was unnecessary to include mitigation based on the location of the dock being far enough from the coral that it won't be impacted. However, if persons think that there should be mitigation for this or other activities, these can be considered.

Simmons follow-up question: What is unclear is whether or not the shoreline will be adjusted due to the shoreline being drastically different. How do you adjust the shoreline without impacting the species in the vicinity?

SEV Response: There are no plans to alter the coastline, the rendering is designed to be aesthetically pleasing. The shoreline is a rock face and the dock will be installed within the indentation of the same.

Simmons comment: Relative to water resources in the area, the document does not mention anything relative to public water supply. The area is subject to chronic water shortage. Suggests that SEV and the developer work together towards some solutions like eliminating some of the freshwater pools or rainwater harvesting.

SEV Question: If the shortage is due to the capacity of water from Water & Sewerage Corporation?

Simmons Response: Yes, I believe so.

Simmons Question: As the protected species listed on site will be guided by the Forestry Unit, how can we be privy to that permit to ensure our precious resources are protected and respected?

DEPP Response: The permit will be a part of this EIA process and will be publicly available including the advice from Forestry whether it gives permission to remove, relocate or replant.

Simmons follow-up question: When will the document be ready?

DEPP Response: Once we would have completed the review process for the EIA, SEV will submit an EMP document and once approved, it will be uploaded to the DEPP website for public access.

Question: How does the DEPP support the developer in terms of compliance relative to the subsequent development. As DEPP is based in Nassau, should we observe deviance from plan, who do we report it to?

DEPP Response: The DEPP conducts monthly site visits to Eleuthera of which this project will be incorporated into. Should there be any concerns, you can contact the Department at 322-4546, inquiries@depp.gov.bs or eleuthera@depp.gov.bs.

Simmons Question: If bulldozing has already happened within the vicinity of the property, what happens then?

DEPP Response: The developer would be issued a cease & desist. Relative to this project, the developer had requested permission to remove the invasive Casuarinas on property, which DEPP granted permission for.

Simmons follow-up question: But no permit was granted for clearing in the coppice area?

DEPP Response: No.

SEV Response: Normally when surveys are done for projects, there is some associated clearing.

Simmons Question: What is the normal scale of the clearing and normal tools?

SEV Response: It depends on the site. If it is a small site, it may be clearing by hand, however some large sites may need heavy machinery. These studies are done to determine the topography of the area relative to sink holes and the like. So typically, there is some clearing for the topographic survey.

Simmons Question continued: Can the Department advise if the normal scale of clearing trumps the legal mandate of the DEPP. Ms. Moultrie has suggested that the type of clearance that has been observed is a norm, but Dr. Neely has suggested that clearance is not permitted without a permit. So I am unsure if there is a problem or not.

DEPP Response: Are you indicating that something has gone wrong?

Simmons Response: I am indicating that there has been a bulldozing activity on property and am trying to determine whether or not the activity is permitted.

DEPP Response: Are you able to provide the DEPP with photographic or video evidence? If so, please do so.

Simmons: Yes.

Suggestion: The EIA does not speak about landmarks or any historically significant site. Research should be done about the pineapple and the document should acknowledge the importance of pineapple production to the area and its historic industry in Gregory Town.

Comment: There was a major flood in 2018 that was quite traumatic where communication to the island was severed. The property was flooded and there was a death, so further commentary to this should be included.

SEV Response: We were aware of the flooding, but not that it took place at the site. SEV will look further into it.

Dina Johnson (Chairman for the Township Eleuthera Island Shores in Gregory Town): Advised that she and other Board members met with Eric Harari, the developer, in 2021 prior to the election and had already given approval. Five board members agreed because they do welcome this kind of project to Gregory Town and believe that the developer has best interests in mind.

Ms. Johnson welcomed Mr. Harari and his team and expressed happiness relative to the meeting being held to include other local stakeholders to advise of the project. Projects like these are allowed to help in providing more jobs. What has been done so far, has been approved by Town Planning and by both the previous Board and the new Board's five members. Should there be any other questions or problems, persons can also contact Gilbert Kemp – Island Administrator for Central Eleuthera, Donald Fernander - Chief Counselor for Central Eleuthera or Dina Johnson at 808-8064.

Question: How long is the building project expected to be completed if given approval?

SEV Response: Some activities would be done in the first year. For example, for site one, the resort will be built with some of the cottages, but more cottages will only be built if there is a need for them. The intent is to build in a modular approach (same with the residential

area). Build out will be over several years until the project is complete, but this depends on the market's appetite.

Gail Charles Question: When will the EMP be made available?

DEPP Response: The EMP once approved will be made available on the DEPP website and on the project website.

Questioned: Will another public meeting be scheduled so that the public can be consulted on the EMP as required by the EIA Regulation 2020.

DEPP Response: There won't be one. The EMP is a living document and as the project progresses, it may require changes. It will be audited regularly for the life of the project. Once the project is complete, the developer has to create and submit an operational EMP which will be submitted every 3 years to ensure compliance.

Lauren Mitchell (Bahamian Citizen & Architect) Comment: She hopes the transparency is kept moving forward. She stated that there is another project under Mr. Harari on Harbour Island where the public does not feel like their comments were considered and promises were not met. However, a project like this could be great for the economy of Eleuthera.

Comment: Architectural design should be tied more closely to Bahamian heritage with involvement from the public towards architectural language. If we preserve our heritage it's better for our own people.

SEV Question: So you would like to see something like a charrette done before design is finalized?

Mitchell Response: Yes

Comment: It is surprising that the document mentions electricity being provided from BPL.

SEV Response: Additional services should be provided and paid for between developer and the utility companies so as to not pull from existing public supply.

Ginny McKinney (attendee) Question: Where does one see what the building structure looks like, and see what septage and water catchment plans are in place? Is solar planned?

SEV Response: What can be seen in the EIA are some of the proposed renderings for the cottages and homes. Final designs are not normally developed until the project has obtained a CEC and the architectural drawings have to go to the Ministry of Public Works for approval. We do talk about it in a little bit more detail in the EMP. However, we typically don't get into those issues unless there may be concerns about negative impacts from utilities. Solar is planned however exactly what that design will look like has not been determined yet. In terms of what percentage of the design it will be, that has not been determined yet either. However, based on experience on past projects, The DEPP often requires that 30% of the energy is powered renewably.

Follow-up question: What about sewage?

SEV Response: The EMP will speak to what is proposed but the final designs would not be available until the document goes to the Ministry of Public Works and Department of Environmental Health Services for their approval.

Gail Charles Question: How can the EIA be considered without critical information being included? The question of sewage, the number of bathrooms, the plan for water, the actual

construction and layout plans for roads, etc.; there is no information for any of that in the EIA. So how can DEPP grant a Certificate of Environmental Clearance without this information which seems to be critical as to if a CEC should be granted or not?

SEV Response: It is very unusual to have very specific construction and engineering in an EIA unless there are concerns about significant impacts because there is a new design or some technology that has never been used. When a CEC is issued, DEPP will indicate that certain prerequisite approvals have to be obtained from various government agencies relative to construction and building. The EMP will speak to some aspects of these things, but there won't be any detailed designs. The developer will go to the Ministry of Public Works which will review the detailed designs and make recommendations or changes while the Department of Environmental Health Services will ensure that adherence to WHO or other health standards. What you are asking for is a complete change to the process.

Gail Charles Comment: I am not suggesting that full engineering drawings should be presented, but it does seem that very little information has been provided relative to the environmental process and impact of this project.

DEPP Response: Where there are concerns, we collaborate with other ministries. What is expected in an EIA is not to have specific details about toilets etc., but to determine the information on the coastlines, ecosystems etc. of which I believe Ms. Moultrie has sufficiently described. If you have a specific question or concern, we ask that you bring that forward so that the developer has an opportunity to address that prior to the closing of this document.

McKinney Question: The ministries will have certain requirements relative to the municipal waste loads. During construction, a lot of plastic is generated. Will this all go to the Gregory Town Landfill to be burned?

SEV Response: Waste management guidance including managing hazardous waste will be included in the EMP as well as guidance on trying to avoid putting unnecessary strain on the landfill and definitely avoiding burning hazardous material.

Will Simmons Question: What is the guidance for activity until the examination of the erosion at Site 2 is completed?

SEV Response: Assuming you mean where there was flooding, we have agreed that we will look at that as a revision to the EIA and make recommendations on mitigation for future flooding activities in that area. I am not stating what those recommendations are due to not seeing the site in that context yet, but recommendations can include setbacks, vegetating the dune systems, elevation for buildings, etc. More details will also be incorporated in the EMP to guide construction.

Lauren Mitchell Question: Will a second public meeting be held following the completion of the revised EIA?

DEPP Response: No, there is no requirement for a second consultation meeting. Have discussed this possibility with Ms. Moultrie, but no decision has been made yet. I note another question about in person meetings in the chat - **Tom Question:** *Is the developer using COVID as an excuse to not have an in-person meeting?* Considering the interest in the project, but also considering the current COVID situation, DEPP will discuss the matter with the Attorney General's Office and the Ministry of Health. Should another meeting be scheduled,

we will follow the consultation guidelines relative to advising the general public of a date and time.

Gail Charles Question: Will DEPP consider holding another consultation after the EMP is received? This seems to be consistent within requirements of regulation 6 and it also seems to be reasonable as a lot of the information that the public is interested in will be in the EMP.
DEPP Response: Will have another look at regulation 6, but it is not my understanding that another public consultation meeting is to be required but that notice should be given that the process has been completed. However, if it is a requirement, then I must be guided by the law.

Will Simmons Question: Please confirm that emailed questions will be addressed and advise how (direct email or generically in the EMP). Also does this project require a heads of agreement?

DEPP Response: The questions will be addressed and can be emailed to the developer and DEPP should be copied to ensure a response is given. Therefore, responses will not come in the EMP, but have to be answered by the developer within the consultation period.

Ginny McKinny Question: Is this Crown land?

SEV Response: No, it's not. It is privately-held land.

McKinny Comment: I saw that it said Crown land on either side of it on the plan, but maybe that was a mistake.

SEV Response: The lots were held by a company and were sold to another company.

Dr. Ancilleno Davis (attendee) Question: Is there a way that all EIAs can be put on the front page of the DEPP website or a list that persons can sign up to be informed about meetings and projects so that persons can be informed in appropriate timing relative to reviewing these documents?

DEPP Response: Unaware of a list, however will ensure a better job is done at ensuring the website reflects what is most current.

Davis follow-up question: Based on the DEPP Act, there is supposed to be Environmental Registry that holds all of this; please advise how can people access the Registry?

DEPP Response: The Environmental Registry is located in the DEPP's office; if interested, call the office to schedule a day and time to visit the office. You will have to sit in the office and review documents requested. Photocopies will be permitted.

Davis Question: How will Family Island constituents be able to access the EIA or EMP documents? Is anything required such as the name of the developer, coordinates of the site, is there a catalog that viewers can scroll or flip through?

DEPP Response: Apart from the EIA being uploaded on the Developer's website, a physical copy would be held in the Island Administrator's Office.

Davis follow-up question: Is it then a requirement for all developers to post a sign at their development with their website clearly labeled? I am trying to figure out how is this process equitable for the Family Island community or people that don't have direct access to the developers or researchers who are doing the EIA.

DEPP Response: We work very closely with the Island Administrators who are all aware of on-going or considered projects for their islands. We hope that the residents have a good relationship with their Island Administrators and Local Government officials to ensure that when these projects are being planned, they are notified in advance of the consultation process; the idea is not to disadvantage anybody.

Question: If I see a development happening but I am unclear of whose project it is and I see something wrong, is there a way to search DEPP's records to see which developments are happening at the location in question?

DEPP Response: If you come to DEPP's office, you can make an appointment and advise of the development that you would wish to review the EIA for. All documents are held in New Providence, however copies of island-specific documents can be found on their respective islands in the Island Administrator's Office.

Gail Charles Question: Will an environmental performance bond be required?

DEPP Response: If and when a decision on a bond is made, it will be made available to the public.

Casuarina McKinney-Lambert Question: Has any development such as this or any proposed development in general to date been required to post an environmental bond?

DEPP Response: Thinks the answer is no, but will double check and follow up with Mrs. McKinney-Lambert the following day.

Will Simmons Question: How could Bel Air reduce its impact from a score of 5 to 3 in terms of impact on the coppice?

SEV Response: This is what the mitigation strategy is for - to reduce high impact scores. For example, retain areas of coppice, ensuring wildlife corridors throughout the property; landscaping with native and endemic plants; Forestry Unit guidance on what could be relocated, inclusive of the ratio for replanting and whether removals are allowed.

Question: What is the intended use for the water access off of the rock face? There are two separate docks shown on the rendering and masterplan in the EIA, yet no marina is being proposed. Is this for boat access for docks or mooring?

SEV Response: The dock is for guest access to the water, but there is no permanent mooring. It will be a drop-off point and water access for snorkeling and swimming and it is my understanding that there will be a set of steps leading down to the dock.

Gail Charles Question: The CEC application requires the developer to state the estimated project capital. Has this been provided to DEPP from the developer?

DEPP Response: This information can be confirmed, however DEPP will follow up with Ms. Charles relative to disclosing this information as the CEC application document has a clause where the developer can request that certain information be made confidential unless required by legal matters.

SEV Response: We typically do not get into financial discussions within the EIA process.

Gail Charles Question: What is the percentage of total paved or covered space?

SEV Response: For Site 1, the 50-acre site, it's 16% and for Site 2, the 5.41-acre site, it's 19%.

Closing remarks by DEPP

Public reminder that there is no approval of an EIA or EMP at this time. We are still in the review process. The job done by DEPP is taken very seriously in how we protect the environment. Thank you for your attention and well-informed questions. We would like to remind you that you have 21 business days to submit your questions, comments and concerns to The Department and to the developer.

Meeting end: 7:44 p.m.

Written Comments & Questions

On 6 May 2022, the following written comments were received from Lillie Baker to inquiries@depp.gov.bs, Eleuthera@depp.gov.bs and the developer:

I am writing as a long standing member of the Gregory Town community and frequent visitor of the Gauling Cay Beach. My primary concerns in reviewing the EIA posted on your website are that it does not seem to address hydrological events that occurred in 2018 in the Gauling Cay area specifically at site 2 of your proposed development. Image 3-4 on page 20 identifies a small creek on site 2; the 'creek' is in fact the remnant of severe erosion that occurred in March of 2018. A 'north easter' storm front created high waves on the eastern side of the island that gradually filled a large basin situated behind the Daddy Joe's Restaurant which then slowly overflowed and with only the force of gravity cut through the queens highway flooding the area behind the dune of Gauling Cay. The water eventually burst through onto the beach at the site where you intend to position your beach club and 25 beach villas...Your EIA does not account for the potential adverse impact of construction at this location given its recent history. Ultimately any additional road works, buildings or other fixtures on the land will augment the flow of water, possibly redirecting it towards other parts of the locale adjacent to your site potentially severely damaging other people's properties or assets. The pictures below detail that erosive event that occurred only 4 years ago... and the extreme nature of the event that did not even occur as the result of Hurricane driven surge. With continued climate change and likely changes in sea level (as your EIA notes) it is extremely likely that events that occurred in 2018 will eventually occur again and possibly with increasing frequency. Clearly development in this area must take careful consideration of this.

Response – Thank you for your detail on this incident. The incident was discussed during the public meeting as well. When looking at Site 2, it appears that historically that area was a wetland with a tidal creek leading to the ocean. Over time that area has either been deliberately filled in with sand or sand has naturally accumulated. With the storm surges, the water goes to where it historically would have and opens the creek again. To minimize flooding, this creek should remain open so that water can flow through to the sea without having to flood roads and homes. The creek system actually exists on the property adjacent to the proposed Bel Air project, so this project will not control whether the creek system is maintained. Preservation of the creek system to ensure it remains open should be ensured by DEPP in conjunction with the Local Government Council and Forestry Unit. Mitigation measures will be taken to incorporate climate resilience into the project design. Such measures would include maintaining setbacks from the wetland and creek system, elevated foundations and stormwater management features (e.g. vegetated swales).

I would also note that your proposed developments contemplate - 70 units with an average human occupancy of 3, 25 units with average occupancy of 2 and 44 units with potential

average occupancy of 4 which would ultimately generate a population of approximately 436 persons. It has already been presented to you that impact on infrastructure is an endearing concern of local residents that face consistent frequent interruptions to water and power supply. Your EIA notes in two locations that it will rely on W&S for water supplies. Indeed the word 'solar' is not mentioned once in your EIA despite your claims to other residents that you will supplement your development with alternative energy. What is the size and type of the solar array you will use - is it off grid, is there battery back up? What size? What is the size of the RO machine you will use if you intend to use one? How much water storage will there be?

Response –

- **Potable water** – typically for projects like this, the developer will have to enter a franchise agreement with the Water and Sewerage Corporation for provision of potable water. If there are shortages for public water provision in Gregory Town, this will require expansion of water provision infrastructure to service the development.
- **Electricity** – The same type of agreement will also have to be reached with BPL to provide additional infrastructure to provide power or permission will be granted for using other sources of electricity, such as solar. Solar panels will be installed on the roofs of all the cottages as a part of the resort to run all air-conditioning units at a minimum. Individual homeowners within the residential components of the project will also be encouraged to utilize solar panels to provide electricity to their homes, at least in part. Buildings and homes will be insulated to reduce electricity consumption from more traditional energy sources.

Indeed given the size and nature of your investment in the area and presumed reliance on beach access at site 2 I would am frankly surprised a developer of your caliber would contemplate such a developments of this scale with only 230 feet of beach property to provide to his guests...Indeed the impact of an additional 400+ persons to a relatively undeveloped coastal habitat is likewise un contemplated within your EIA. The externality of this many persons concentrated in such an area would undoubtedly limit beach access for us locals and definitely overflow on to adjacent properties damaging the idyllic nature of the cay.

I would be grateful if you would address these issues please.

Response – While numbers are indicated for the development, these would be the maximum. The EIA looks at the maximum to determine the most significant impacts that could potentially arise. In reality, the development of the sites will be market-driven. Lots will be developed 10 at a time and no new lots will be developed unless they are sold. If there is no demand, both sites could potentially not expand beyond 20 lots.

This coastal area is significantly modified and developed by residents already there. Though the houses are few, the vegetation on the dunes has been disturbed and invasive introduced

all along the shoreline. The project intends to remove all the invasives which will actually improve the health of the shoreline. There will be designated access paths to the beach with a view to minimizing any disturbance of dune vegetation. Establishing setbacks from the high water mark or primary dune will also be important to the keeping the beach ecosystem healthy.

Ms. Baker also send a follow-up email later on 6 May 2022:

Unfortunately, I have prior obligations on that date, which is why I am submitting my concerns and questions to you at this time and in this manner. Be that as it may I would hope that you can provide a clear response in answer to my concerns as you are required to do under law. For the record at this time while I am grateful for your response you have failed to provide any answers to my questions. I will patiently await for you to fulfil your legal obligation to address those concerns as detailed in my previous email and I trust the DEPP representatives cc'd on the email will likewise ensure your compliance in this matter as they too are obligated to do.

For what it's worth I would strongly advocate that you host this meeting in person in the settlement of Gregory Town so those that are most impacted by your development can weigh in. Many persons, particularly elders in the community do not have access to Zoom and knowledge on how to use it.

Response – DEPP explained during the public meeting that in-person meetings were not possible in May due to COVID restrictions. They indicated that they would discuss with the Attorney-General's Office and the Ministry of Health whether it would be feasible at a later date.

On 10 May 2022, the following written comments and questions were received from Will Simmons to inquires@belairbahamas.com and inquiries@depp.gov.bs.

Mr. Simmons repeated some of these comments and questions during the public meeting and they were addressed. The responses are repeated below for ease of reference.

How are you? I am a school teacher and property owner in the vicinity of your proposed development. We have not met, but as per the DEPP process I have some questions I hope to see addressed before or during the pending Zoom town hall meeting. The DEPP is copied for convenience as they are, I believe, accountable by protocol to acknowledge and address concerns raised in the public consultation process.

Please note I raise these questions from a place of sincere concern as a Bahamian educated in natural and geographic sciences. I have led educational programmes in the vicinity and am

familiar with the ecology and topography and the coastline North and south of Gregory Town, having led student field trips throughout the area to teach Bahamian youth about the various marine life flora and fauna. I have been a long standing associate of BREEF, BNT, CORE, The Nature Conservancy, One Eleuthera Foundation and The Island School all leading conservation organisations. I have helped write and execute grants with these organisations. I am a geography teacher and am well versed in the bio ecology of the Bahamas islands.

I applaud your thorough EIA, and your expressed intent to create a low impact high quality destination that enhances our island. I believe that with some consideration and genuine collaboration solutions can be found that allow for the appropriate and sustainable development of our island. To this end My questions are as follows.

1. Your renderings suggest you will be substantially adjusting the shoreline and cliff area? I have snorkeled the area and am aware of a range of coral species therein - I didn't see any reference to the impact on these in the EIA in your proposed mitigation measures. Some coral species are listed including the endangered Boulder Star Coral. But no mention is given as to how you will mitigate damage. If I am correct, all coral species are protected, how will you or the DEPP be able to ensure protection of the corals if you proceed with such cliffline alteration?

Response – There are no plans to alter the coastline, the rendering is designed to be aesthetically pleasing. The shoreline is a rock face and the dock will be installed within the indentation of the same. A boulder star coral was observed in the vicinity of the coastline, but it was not very close to where the dock would be located. The dock construction has no dredging plan, only the installation of a few pilings. We determined it was unnecessary to include mitigation based on the location of the dock being far enough from the coral that it won't be impacted.

2. On page 58 it says "Protected trees will be marked prior to construction so they can be retained, where feasible." How will feasibility be determined? The most common protected species I'm aware of are the agave species in the shoreline area along the coastline either side of Gregory town. The rendering suggests the complete alteration of this shorefront. No specific plans are mentioned for the endemic and endangered Agava Bahamana Species. Will these individuals be secured, relocated or undisturbed? In the interior of the property the coppice forest lists Horseflesh, cascarilla, coccothrinax argenta, among others. I am surprised not to see the vulnerable Buccaneer palm as I have observed in nearby strands of forest. Can you elaborate on your plans for selective clearing and avoidance of bulldozing. Bulldozer activity has been observed in the area, despite the fact that we have not completed the consultation process. Can you and the DEPP assure that bulldozer activity will be minimised? Can a quantifiable degree of intact vegetation be stipulated. For example, 85% of existing vegetation intact?

Response – Feasibility will be determined by the Forestry Unit in any guidance they issue with the Forestry Permit for protected species. The Forestry Unit will determine which species must be kept, which can be replanted and which can be removed. Often with allowing removal, the Unit requires new specimens of the plant to be planted at a ratio of 2:1 or 3:1 somewhere else on the property. Mitigation measures confirm that every effort will be made to retain native vegetation and utilize selective clearing as much as possible. The Forestry Permit will indicate percentage of vegetation to be retained.

2. On Page 55 of the EIA the proposed project's impact on the ecology of the area is listed as a 5 or the maximum negative impact on the scale. Have you considered any alterations to the plan to reduce this to a 2 or 3 - such as reducing the density of the proposed development or construction design to reduce the overall impact. My particular concern is the 5000sq ft homes and the overall number of homes would you be willing to work with SEV your consultant to receive recommendations to reduce this impact.? Can the DEPP in good faith give clearance swiftly to a property that in its own EIA is a 5 in terms of impact on coppice forest?

Response - This is what the mitigation strategy is for - to reduce high impact scores. For example, retain areas of coppice, ensuring wildlife corridors throughout the property; landscaping with native and endemic plants; Forestry Unit guidance on what could be relocated, inclusive of the ratio for replanting and whether removals are allowed.

3. Your development intends to harness the public water utility. Having experienced frequent water outages in my time in this locale. I wanted to ask if you were considering alternatives such as rainwater harvesting or reduction of water consumption by eliminating proposed freshwater swimming pools? I strongly recommend that this be considered if a CEC is to be issued.

Response - Typically for projects like this, the developer will have to enter a franchise agreement with the Water and Sewerage Corporation for provision of potable water. If there are shortages for public water provision in Gregory Town, this will require expansion of water provision infrastructure to service the development.

The development also intends to incorporate rainwater harvesting to be used for irrigation and potentially inside resort cottages and swimming pools. The intent is to use water produced by reverse osmosis (RO) for most of the resort. It is likely that most residential homes will utilize RO water as well.

4. I would like to know more about how the DEPP supports your company in remaining compliant to the listed mitigation measures detailed in pages 57 through 59.

How frequently will site checks be made? What sort of impact reports will be given and with what frequency? How will they be made available to us, the Bahamian public.

Response – DEPP will make monthly site visits to Eleuthera to inspect development projects. There is also usually a requirement for an external environmental monitor to ensure compliance with the mitigation measures. The checklist this monitor will utilize will be included in the EMP.

5. It is indicated that there are no heritage sites of significance in the area of the property. I'm quite surprised that the consultant overlooked the significance of the pineapple industry in Bahamian history. As a high school social studies teacher I have for years had to give detailed lessons on this valuable part of our heritage. I would like to point out that the very emblem of Eleuthera is the pineapple. The site occupies some of the first major pineapple producing fields in the Caribbean and North America. I feel that some effort could and should be made to acknowledge, protect and support the preservation of this living heritage. Such as the replanting of pineapple fields, and support for local pineapple producers.

Response – The EIA will be amended to include more information about pineapples and their significance to Gregory Town as a part of the cultural-historical section of the document. Pineapples will be planted on the property as well as fruit trees and vegetables and some of these will be utilized by the restaurant as a part of its menu.

Thank you for your time and consideration. We are stewards of this land and there are many Bahamians who value our natural heritage. As an educator I sincerely hope that both you and the DEPP can act in a manner that rebuilds trust in this process.

I wish you continued success in your business ventures and ask sincerely that you consider the questions I have raised in good faith.

On 14 May 2022, the following written comments were received from Jennifer Stack directly to the developer, Mr. Eric Harari:

I would like to start by saying the Zoom meeting with DEPP was interesting and some good points were made.

However, I am writing to you again to appeal to the way you move forward as a developer here on Eleuthera. As we all know sustainability is the only way forward, leaving as little impact as possible on our fragile but once robust environment is imperative. Developing large scale projects without this in mind is the definition of insanity, doing things the same old way and expecting a different outcome. I hope and pray you will use your head and think outside the old box moving forward.

As I have stated, I am for development in Eleuthera so that jobs can be created but developing “with sense” is the only way we can accomplish and still leave the environment intact so our future job holders and your future clients can still see, hear, taste, smell and enjoy the wonders of our environment without having to imagine the way things used to be.

Let’s make Eleuthera an example of how the progress of the future looks. Be a pioneer Mr. Eric, not a same old, same old that destroys in the name of progress. Let’s work together and make and keep Eleuthera the beautiful wonder that it is.

Thank you for your time and hopefully your consideration moving forward

SEV Response – Your comments are received with thanks. With the mitigation measures outlined in the EIA and detailed in the EMP, the project proponents seeks to develop both Sites 1 and 2 in as sustainable a manner as possible.

On 15 May 2022, the following written comments were received from William S. Holland to info@sevconsulting.com and inquiries@depp.gov.bs:

In reference to the above, I am concerned about a number of things. Firstly, how will water be provided to such a large number of residences and cottages. In Gregory Town, we are already regularly without water for several days each month. Secondly, will our electricity supply be affected, too? Thirdly, how will all that sewage be disposed of? Not in the sea, I hope! Lastly, as a longtime resident of Gregory Town, I am concerned that the very area proposed for Site 2 is subject to a large 'river' of sea water from the Atlantic(east) side during hurricanes and meteorological events known locally as 'rages'. How will this be dealt with? I await your reply.

SEV Response – Responses are made to each point as follows:

1. **Potable water** – typically for projects like this, the developer will have to enter a franchise agreement with the Water and Sewerage Corporation for provision of potable water. If there are shortages for public water provision in Gregory Town, this will require expansion of water provision infrastructure to service the development.
2. **Electricity** – The same type of agreement will also have to be reached with BPL to provide additional infrastructure to provide power or permission will be granted for using other sources of electricity, such as solar.
3. **Sewage treatment** – For residential subdivisions of 25 lots or more, the developer will be required to construct a package sewage treatment plant to handle all sewage generated by the development. Up until 25 lots are reached, homes will typically use treatment methods such as FAST septic treatment system.
4. **Climate resilience** – When looking at Site 2, it appears that historically that area was a wetland with a tidal creek leading to the ocean. Over time that area has either been deliberately filled in with sand or sand has naturally accumulated. With the storm surges, the water goes to where it historically would have and opens the creek again.

To minimize flooding, this creek should remain open so that water can flow through to the sea without having to flood roads and homes. The creek system actually exists on the property adjacent to the proposed Bel Air project, so this project will not control whether the creek system is maintained. Preservation of the creek system to ensure it remains open should be ensured by DEPP in conjunction with the Local Government Council and Forestry Unit.

A suggestion was raised during the public meeting that a design charrette should be held with local residents. The developer is open to this occurring prior to final designs for the buildings and homes which will be a part of the project.

Appendix 1: List of Participants

1. Stacey Moultrie (SEV)	40. Scott Sawyer (Ministry of Works & Utilities)
2. Melissa Ingraham (SEV)	41. Suzanne Pattusch
3. Dr. Rhianna Neely (DEPP)	42. Will Simmons
4. Gammell Deal (DEPP)	43. William Braithwaite
5. Arana Pyfrom (DEPP)	44. Yes
6. Herbert Pinder (DEPP)	45. Etoile
7. Chanel Williams (DEPP)	46. Fred
8. Alena	47. Agnessa Lundy (BRON Ltd.)
9. Alex Kim	48. Carlton Russell
10. Amanda's iPhone	49. Gail Lockhart-Charles
11. Annette Young	50. Andy
12. Ben Simmons	51. Philip Thompson
13. Ben Simmons	52. matt
14. Brent Fairbairn	53. MD
15. Casuarina-McKinney Lambert (BREEF)	54. Donna Whitfield DeCosta
16. Dave Ireland	55. Ginny McKinney
17. Davon Gibson (Bel Air)	56. Sharell Bonaby
18. Denise Worrell	57. PT & Tom
19. Dina Johnson (Local Government, Town Chairman)	58. Sidney
20. Ebony	59. William's iPhone
21. Eric Harari (Bel Air)	60. Franchesca Paloma (BRON Ltd.)
22. Florence	61. Dr. Ancilleno Davis (BNT)
23. Florence	62. act
24. Jacquei's iPad	63. GT
25. Jan Turnquest	64. Guest
26. Jennifer's iPhone	
27. Joan Braithwaite	
28. June	
29. Karl Hirzel	
30. Katrine	
31. Lauren Mitchell	
32. Mario G	
33. Mile's iPad	
34. Ms. Rolle	
35. Merrit Storr (Bel Air)	
36. NB	
37. OK	
38. philippajanesimmons	
39. Rick Waserman	

Names listed are based on those displayed in the Zoom meeting participants list. Participants are not obligated to identify themselves.

Appendix 2: Public Consultation Presentation

Bel Air Project

Stakeholder Consultations

12 May 2022



Project Overview

- Resort & residential development near Gregory Town, Eleuthera
- Site 1 (approx. 50 acres) – Resort & residences
 - Resort – 70 cottages with restaurant, bar, pool, gym, spa & small dock
 - Residences – 44 residential homes
- Site 2 – (approx. 5 acres) – Beach club with 20 – 30 cottages
- Green spaces
- Associated infrastructure

Site 1



Site 2





Cottages



Residential Homes

EIA Team Expertise

SEV Consulting Group

- Botany
- Environmental planning
- Environmental legislation
- Environmental science
- Ornithology
- Zoology



Plants on the site

Protected tree species – Site 1

Common Name	Scientific name
Endemic, Endangered or Threatened Species	
Bahama Century Plant	Agave bahamana
Turtle Grass	Thalassia testudinum (Marine)
Cultural or Historical and Economic Trees	
Gum Elemi, Gumbo Limbo	Bursera simaruba
Cascarilla, Eleuthera Bark	Croton eluteria
Silver Top Palm, Silver Thatch Palm	Coccothrinax argentata
Buttonwood	Conocarpus erectus
Bahama Brasiletto	Caesalpinia bahamensis
Small-leaved Blolly	Guapira discolor
Beefwood	Guapira obtusata
Joe Bush, Iron Wood	Jacquinia keyensis
Thatch Palm, Buffalo Top Palm	Leucothrinax morrisii
Horse Flesh	Lysiloma sabicu
Wild Tamarind	Lysiloma latisiliquum
Mahogany	Swietenia mahagoni
Stinking Pea, Bahamas Senna	Senna chapmanii
No known common name	Thrinax radiata

Protected tree species – Site 2

Common Name	Scientific name
Endemic, Endangered or Threatened Species	
Bahama Century Plant	Agave bahamana
Bamboo, Manilla	Agave cacozele
Cultural or Historical and Economic Trees	
Silver Top Palm, Silver Thatch Palm	Coccothrinax argentata
Buttonwood	Conocarpus erectus
Bahama Hibiscus	Hibiscus clypeatus
Railroad Vine, Goats Foot, Bay Hop, Bay Winders	Ipomoea pes-caprae
Black Ebony	Pera bumelifolia
Sabal Palm	Sabal palmetto
No known common name	Thrinax radiata



Birds on Sites 1 & 2

Bird Species Observed

Common Name	Scientific Name
American Kestrel	<i>Falco sparverius</i>
Palm Warbler	<i>Setophaga palmarum</i>
Grey Catbird	<i>Dumetella carolinensis</i>
Bahama Woodstar	<i>Nesophlox evelynae</i>
Thick-billed Vireo	<i>Vireo crassirostris</i>
Northern Mockingbird	<i>Mimus polyglottos</i>
Prairie Warbler	<i>Setophaga discolor</i>
Black and White Warbler	<i>Mniotilta varia</i>
Greater Antillean Bullfinch	<i>Melopyrrha violacea</i>
Bananquit	<i>Coereba flaveola</i>
White-crowned Pigeon	<i>Patagioenas leucocephala</i>
American Redstart	<i>Setophaga ruticilla</i>
Common Ground Dove	<i>Columbina passerina</i>
Osprey	<i>Pandion haliaetus</i>
Belted Kingfisher	<i>Megaceryle alcyon</i>
Cuban Pewee	<i>Contopus caribaeus</i>
Smooth-billed Ani	<i>Crotophaga ani</i>
Western Spindalis	<i>Spindalis zena</i>



Significant Impacts

- Clearing of land
- Construction that will impact how birds & other animals utilize both sites

Mitigation Measures

Impacts	Proposed Mitigation Measures
Clearing of land	<ul style="list-style-type: none">• Clearing will be minimized as much as possible to the footprint of new buildings.• Clearing will be selective rather than bulldozing the entire area with protected trees being marked prior to construction.• Native trees and plants will be maintained wherever possible, especially where they are clustered• Landscaping will utilize native and endemic plants and trees.• No invasive plant species will be utilized in landscaping.
Construction	<ul style="list-style-type: none">• Birds and other animals are expected to return to the sites when there is no active construction.• When construction is active, there are vegetated areas neighbouring the sites that birds and other animals can utilize.

Other Impacts Assessed

- Materials
- Air quality & dust
- Waste management
- Water resources
- Noise & vibration
- Traffic & transport
- Contaminated land
- Occupational health & safety
- Impacts on neighbouring communities

Mitigation Measures

Impacts	Proposed Mitigation Measures
Noise & vibration	<ul style="list-style-type: none">• Construction workers will wear appropriate PPE.• Nearby residents are not expected to be exposed to high noise levels as there will be no work during evening and night.• Nearby businesses are a sufficient distance away to reduce their exposure to high noise levels.
Impacts on neighbouring communities	<ul style="list-style-type: none">• Regular communication with neighbouring communities and businesses so they are informed of any potential disruptions to traffic and can plan accordingly.• They will be advised when noise levels may be elevated during daytime hours (limited to 10 am to 5 pm).• Mechanism established for neighbouring residents to contact project management to ensure regular communication. Contact telephone numbers will be posted at site for project management as well as Government agencies, such as DEPP.

Next Step

1. Public consultation results (meeting and written comments) – Report
2. EMP for the project to be reviewed by DEPP

Written Comments

Deadline – Tuesday, 14 June 2022 at 5 pm

SEV Consulting Group
info@sevconsulting.com

Department of Environmental Planning &
Protection
inquiries@depp.gov.bs



Questions?