

**VIA EMAIL**

July 16, 2021

Mrs. Rochelle W. Newbold  
Director  
Department of Environmental Planning and Protection  
Charlotte House – Ground Floor  
P.O. Box N-7132  
Nassau, N.P., The Bahamas

Public Consultation Report (PCR) – Disney Cruise Line, Lighthouse Point, Eleuthera, The Bahamas

Dear Director Newbold,

With respect to the Environmental Impact Assessment Regulations 2020, Sections 7-9 addressing the public consultation process, we are pleased to submit the Public Consultation Report (PCR) for your review.

For reference, notices for the Public Meeting appeared in The Nassau Guardian and the Tribune for three (3) consecutive days (March 18<sup>th</sup>, March 19<sup>th</sup>, and March 22<sup>nd</sup>). The Public Meeting was held on April 8<sup>th</sup> at 6pm. Following the meeting, a 21 business-day comment period ensued ending May 7, 2021 at 5pm. An additional public notice detailing the deadline for the comment period was published in The Nassau Guardian and the Tribune for three (3) consecutive days (April 14<sup>th</sup>, April 15<sup>th</sup>, April 16<sup>th</sup>).

All correspondence received between March 18<sup>th</sup> and May 7<sup>th</sup>, the consultative period, is included in the PCR. Responses to these inquiries are also catalogued within the PCR. Additionally, the PCR contains a transcript of the public meeting.

Thank you for providing guidance on the public consultative process and facilitating the Public Meeting.

Sincerely,



Melissa Alexiou  
Director

PUBLIC CONSULTATION REPORT  
FOR THE  
ENVIRONMENTAL IMPACT ASSESSMENT

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LIGHTHOUSE POINT  
ELEUTHERA, THE BAHAMAS

APPENDIX L

PREPARED FOR

DCL ISLAND DEVELOPMENT, LTD.

JULY 2021



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## **1.0 INTRODUCTION**

The purpose of this report is to document the public consultation that was conducted in relation to the Environmental Impact Assessment (EIA) for the Lighthouse Point project in Eleuthera, The Bahamas for DCL Island Development, Ltd., a wholly owned subsidiary of the Walt Disney Company. The Public Consultation Report (PCR), like the EIA, is submitted to the Government of The Bahamas through the Department of Environmental Planning and Protection (DEPP) for evaluation of the project's application for a Certificate of Environmental Clearance (CEC). This report includes a recap of the virtual public meeting and responses to questions received during the meeting as well as responses to emails and letters received thereafter.

## **2.0 PUBLIC CONSULTATIONS**

In accordance with the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020, the public meeting was advertised in two (2) local newspapers, The Nassau Guardian and The Tribune, at least 14 calendar days prior to the public meeting date. The EIA was made available to the public in two ways: 1) electronic copies were available for download from the Lighthouse Point project website (<https://lighthousepointbahamas.com/>) and 2) two (2) hard copies were available for reading at DEPP, Charlotte House, Ground Floor in Nassau, New Providence and one (1) copy was available at the Island Administrator's Office in Rock Sound, Eleuthera. The purpose of these activities was to notify the public about the project, allow them an opportunity to review the EIA, invite them to the public consultation meeting, and provide email addresses the public could use to submit questions or concerns in regards to the EIA directly to the developer through the Lighthouse Point project website (<https://lighthousepointbahamas.com/>) or at [DCL.Bahamas@Disney.com](mailto:DCL.Bahamas@Disney.com), and/or to DEPP at [inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs).

### **2.1 VIRTUAL PUBLIC MEETING**

The public consultation meeting for the Lighthouse Point EIA was conducted via Zoom at 6 p.m. EST on April 8, 2021. The meeting was moderated by Mrs. Rochelle Newbold, Director of DEPP, and had over 300 participants.

The agenda for the meeting included an introduction of the project team and review of the site plan and EIA findings that were compiled by a team of highly qualified and experienced scientists, ecologists, professional engineers and construction experts over three years, many of whom participated in the meeting. A question and answer period was also included in the meeting providing the public with an opportunity to have questions addressed by those who worked on the EIA. Comprehensive audio and chat transcripts were prepared from a video recording of the meeting and are provided in the attachments to this report. Well over 300 statements, opinions and questions were captured by the system including questions posed verbally, in writing, and via the meeting recording for Disney to provide a response. Additional comments were accepted through May 7, 2021 at 5 p.m. EST.

Topics addressed in those questions included, but were not limited to, the following categories:

- Potential impacts to terrestrial and marine habitats and species and mitigation strategies

- Proposed use of the property
- Projected economic impacts to the island of Eleuthera, and The Bahamas in general
- Proposed infrastructure plans for the project (waste management, potable water, stormwater, etc.)
- Potential coastal impacts from beach creation and management and mitigation strategies
- Sustainability planning and initiatives proposed as part of the development

## **2.2 EMAILS**

Following the meeting on April 8th, the public was given an additional 21 business days to submit questions or concerns regarding the EIA, either directly to the developer and/or DEPP at the email addresses aforementioned. The public comment period following the public meeting ended on May 7, 2021 at 5 p.m. EST. The public consultation process is guided and moderated by DEPP as the statutory governing body with responsibility for the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. All emails and notifications were shared by the developer with DEPP and vice versa. The PCR accounts for all emails received.

### **3.0 CONCLUSION**

All comments received during the public meeting and comments and questions received after the public meeting but prior to the May 7, 2021 5 p.m. EST deadline have been addressed by the developer. The team has thoroughly reviewed all EIA public consultation inquiries and does not believe there are any gaps within the EIA document that has been submitted. The developer follows and has the utmost respect for the laws and regulations of the locations where it does business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.

The official public consultation period for Lighthouse Point concludes with the submission of the PCR. This is a public report and shall be considered part of the overall 'Environmental Impact Assessment – Lighthouse Point' report. The EIA and PCR documents are available for public viewing on the Disney Lighthouse Point website. The DEPP approved EIA inclusive of the PCR will be available on DEPP website. Following the publication of this report on the DEPP website, the Environmental Management Plan (EMP) will be prepared by the developer.

**4.0 ATTACHMENT A: RECORDED PUBLIC MEETING AUDIO TRANSCRIPT**

## **LHP EIA Public Consultation - Transcript**

*April 8, 2021*

*6 p.m.*

WEBVTT

1

00:01:02.580 --> 00:01:11.280

Director Newbold: Having their concerns or questions heard, I will go through a few housekeeping rules as it relates to the meeting tonight.

2

00:01:11.700 --> 00:01:22.170

Director Newbold: Please note that, due to the issues of bandwidth we are asking that you not turn on your cameras that's allowing the presenters to have the opportunity to use the bandwidth.

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00:01:22.410 --> 00:01:33.720

Director Newbold: To make their presentation, such that all personnel persons, whether in The Bahamas or outside of The Bahamas, may have the best opportunity of getting the information without disruption.

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00:01:34.800 --> 00:01:44.880

Director Newbold: Secondly, we ask that your mics remain muted until such time that you are asked, to make any sort of statement or comment or we open the floor to such.

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00:01:45.630 --> 00:01:57.030

Director Newbold: Third, I know that there are a lot of strong positions relative to this project but tonight, our effort is to identify any matters, gaps.

6

00:01:57.390 --> 00:02:07.800

Director Newbold: Inconsistencies or anything of an environmental concern associated with the environmental document that has been placed in the public domain for review.

7

00:02:08.310 --> 00:02:18.030

Director Newbold: That being said, those individuals who have the need to express an opinion, we are asking that you put those opinions in the chat.

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00:02:18.960 --> 00:02:32.970

Director Newbold: One of the outputs of this project, sorry of this process, is the production of a public consultation report that report must reflect any comments, concerns or opinions that are shared or

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00:02:33.840 --> 00:02:44.820

Director Newbold: provided during the consultative process which is inclusive of tonight's meeting, as well as a 21 working day period thereafter.

10

00:02:45.150 --> 00:02:57.540

Director Newbold: So I don't want people to feel slighted should they not be able to get the floor per se for the meeting and so that they can verbalize their positions, but we are really, really.

11

00:02:58.050 --> 00:03:17.340

Director Newbold: urging you, I'm asking you, that the request for the floor, be related to actual questions associated with the EIA or the identification of any gaps associated with the documentation that has been put in the public domain.

12

00:03:18.360 --> 00:03:32.310

Director Newbold: We will ask everybody use the hand raised function in order to be called upon, if you are not compliant with the house rules that I am putting forward, you will be at first muted.

13

00:03:32.940 --> 00:03:42.360

Director Newbold: And if you consistently persist, you will be ejected from the meeting. I want to be very clear here, it will not be Disney that's going to

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00:03:43.050 --> 00:03:49.050

Director Newbold: eject you from the room, it will be the Department of Environmental Planning and Protection, as we have one function.

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00:03:49.260 --> 00:03:57.000

Director Newbold: For tonight's meeting, it is to meet and gather from the Bahamian people and those who may have interest in the Bahamian environment,

16

00:03:57.360 --> 00:04:09.900

Director Newbold: Any concerns relative to the production of the information as provided to the government in the EIA we're asking you to be partners with us in this, for, if you would all our minds and.

17

00:04:10.350 --> 00:04:15.420

Director Newbold: heads together on this review process if there are gaps you let us know.

18

00:04:16.230 --> 00:04:23.880

Director Newbold: If you don't let us know that there are any gaps during the course of this consultative process we assume that the document is ready to go so.

19

00:04:24.150 --> 00:04:36.900

Director Newbold: it's very important that we get those questions or concerns and not so much your opinion as to whether the project could go ahead or not go ahead, because that is not the objective of tonight's meeting.

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00:04:38.670 --> 00:04:48.480

Director Newbold: As I said, we want everybody to be respectful of this process okay keep that in mind, second thing we also want you to be aware of

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00:04:48.990 --> 00:05:00.630

Director Newbold: tonight is the night for Disney to make its presentation to all interested parties after tonight, there will be a 21 day period where you can still provide your comments.

22

00:05:01.050 --> 00:05:16.290

Director Newbold: via email directly to the department or via Disney or both. By law, both parties must share any comments it's received from the public with regards to the process so either which way we both going to get it.

23

00:05:17.010 --> 00:05:39.270

Director Newbold: And you can definitely check back with the production of the public consultation report to verify that your comment was captured and is reflected in the document. That being said, the cutoff time is 21 days from today's meeting. Should your comment come in on 22nd day by law, it is non....

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00:05:40.290 --> 00:05:49.230

Director Newbold: It can't be admissible, so we to advise you and we do urge you to be very efficient in the use of the time that's legally mandated for this process.

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00:05:50.340 --> 00:06:00.540

Director Newbold: So, as it relates to the functionality of the participation in tonight's meeting for those of you that are on via your computers, please note at the bottom of your screen.

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00:06:01.140 --> 00:06:06.960

Director Newbold: You will see that there is a reaction, there's a smiling emoji with a plus over their head.

27

00:06:07.800 --> 00:06:22.140

Director Newbold: You will be able to click that to put your hands up right, and if you are on your phone, then you would have to look and see how the whole process is outlaid on your phone, I think it may be to the right, but whether using

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00:06:23.250 --> 00:06:27.390

Director Newbold: An apple device or android device, you would have to make that determination.

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00:06:28.470 --> 00:06:45.480

Director Newbold: But we will only be allowing folks to take the floor during the question and answer period and that will be via the raising of your hands the system will put persons in the rank and order in which their hands are raised.

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00:06:46.500 --> 00:06:55.770

Director Newbold: The process for tonight, now that I've gone through the house clearing rules, housekeeping rules rather, the process for the night is one the meeting is being recorded too.

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00:06:56.250 --> 00:07:03.300

Director Newbold: Disney will have 30 minutes in which they gave the presentation about their project, there will be no interruptions during that presentation.

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00:07:03.780 --> 00:07:15.300

Director Newbold: After that presentation, there will be a 40 minute period where we will take question and answers, you will have one minute to get your question out.

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00:07:15.810 --> 00:07:29.880

Director Newbold: Please do not have a speech, we just need you to get to the salient point of the question, so that we can use this time as efficiently as possible, so with that being said, I will now turn the process over to

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00:07:31.290 --> 00:07:33.420

Director Newbold: Miss Prunty

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00:07:34.470 --> 00:07:39.480

Director Newbold: for her for the introduction of the Disney team on the presentation for tonight.

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00:07:40.920 --> 00:07:48.930

Kim Prunty: Thank you, Director Newbold and thanks to everyone who has joined us, we are grateful for the opportunity to share more information about our projects.

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00:07:49.350 --> 00:07:57.900

Kim Prunty: I will be delivering the presentation tonight, along with Dr Mark Penning who is Vice President of our Animal Science and Environment team. Dr Mark, could you introduce yourself.

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00:07:59.550 --> 00:08:19.500

Mark Penning: Yes, I can, good evening everybody and thank you for the opportunity and I am very proud to lead the Disney Animal Science and Environment team, which essentially consists of about 1000 animal care professionals, conservationists, educators.

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00:08:20.580 --> 00:08:26.550

Mark Penning: And people that are really passionate about protecting the planet for generations to come.

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00:08:28.740 --> 00:08:36.810

Kim Prunty: Thank you, Dr Mark. First as we get started, we just like to share our general commitment to The Bahamas. The Bahamas is as much our home as anywhere.

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00:08:37.290 --> 00:08:45.330

Kim Prunty: From an economic impact perspective it is estimated our operations lead to more than \$60 million annually in direct spending in the Bahamas.

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00:08:45.750 --> 00:08:59.100

Kim Prunty: that's when we're operational. Today, and when we're operational, 75% of the cruises have at least one stop in the Bahamas. We've operated Castaway Cay for more than 20 years and all four of our ships are registered in The Bahamas.

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00:08:59.550 --> 00:09:08.310

Kim Prunty: From a conservation perspective, Dr Mark and his team have also been involved for quite some time making significant donations from the Disney Conservation Fund.

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00:09:08.790 --> 00:09:19.530

Kim Prunty: Also Mark's team has been very involved in coral rehabilitation efforts in Abaco for more than 10 years. They've also supported eco camps and help support curriculum for Bahamian schoolchildren.

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00:09:21.840 --> 00:09:27.510

Kim Prunty: We spent a lot of time in the Bahamas talking to people about what's important to make sure that when we contribute to the community

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00:09:27.750 --> 00:09:34.740

Kim Prunty: we're doing it in a way that meets community needs and a few themes have come out because of that. One is the importance of Bahamian ownership.

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00:09:35.070 --> 00:09:40.530

Kim Prunty: Which is why we've invested a million dollars over three years to the National Small Business Development Centre

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00:09:40.800 --> 00:09:49.080

Kim Prunty: and the Eleuthera Chamber to create an Eleuthera Business Hub, to take advantage of the project that we're bringing as well as the others are bringing into Eleuthera.

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00:09:49.740 --> 00:09:56.820

Kim Prunty: We also have a focus on education and workforce development. We've worked with the LJM Maritime Academy to provide scholarships.

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00:09:57.270 --> 00:10:06.870

Kim Prunty: we've also worked with the Ministry of Education. We've done reading programs for years, most recently, we provided devices to students in Eleuthera and Abaco to help

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00:10:07.230 --> 00:10:19.020

Kim Prunty: during these challenging times. We also continue to work with Urban Renewal in Eleuthera to provide computers for after school needs, support college program visits and so forth.

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00:10:19.440 --> 00:10:30.420

Kim Prunty: As you'll hear today, promoting culture is very important to us in this project. We continue to work with the Ministry of Youth, Sports and Culture to support Junior Junkanoo and other programs to continue

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00:10:31.140 --> 00:10:38.130

Kim Prunty: to share the culture and the unique culture of The Bahamas. And, of course, we also contribute to emerging community needs.

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00:10:38.490 --> 00:10:43.740

Kim Prunty: we've contributed during Hurricane Dorian both to the rebuilding efforts through donations to nonprofits.

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00:10:44.040 --> 00:10:56.790

Kim Prunty: As well as direct contributions of supplies and other things to communities in need using our ships, as well as supporting our Bahamian employees. Over the holidays, we contributed to Bahamian feeding programs as another example.

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00:10:59.010 --> 00:11:06.060

Kim Prunty: Many of you have likely seen this presentation. This slide has been in nearly every presentation we've given in the Bahamas, for the past three years.

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00:11:06.570 --> 00:11:18.570

Kim Prunty: Our design principles are really about developing the site in an environmentally responsible way, creating sustainable economic opportunities for Bahamians, celebrating Bahamian culture, and further strengthening the community.

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00:11:21.210 --> 00:11:30.930

Kim Prunty: From a design perspective I think many of you know that Lighthouse Point was privately owned for decades, it was available for sale for several years before Disney Cruise Line purchased it.

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00:11:31.290 --> 00:11:40.440

Kim Prunty: The previous development proposal which I'll show you in just a minute included plans for several homes, condominiums, villas, a hotel and 140 slip marina.

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00:11:41.160 --> 00:11:45.210

Kim Prunty: 140 slip marina conducted through the salt, constructed through the salt ponds.

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00:11:45.780 --> 00:11:51.180

Kim Prunty: We considered several other locations in the Bahamas. Even nearby in Eleuthera as an example, we looked at Egg Island.

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00:11:51.570 --> 00:11:58.410

Kim Prunty: We got into the Environmental Impact Assessment and did not feel comfortable with the environmental impact it would have on the marine environment.

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00:11:59.070 --> 00:12:14.940

Kim Prunty: We really looked at a variety of other places Morgan's Bluff and Andros, an example, some locations in the Berry Islands, and it really came down to where can we locate that would not require dredging and would allow access to deep water, and was privately owned land.

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00:12:15.990 --> 00:12:23.430

Kim Prunty: The project components include a variety of things. One is Disney donated land, so public road, parking and beach amenities and

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00:12:23.760 --> 00:12:31.200

Kim Prunty: the southern most point of the property. And government will work with us to determine how they will they will use those areas.

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00:12:31.860 --> 00:12:41.340

Kim Prunty: An open- trestle appear that is capable of hosting one ship at a time, with no dredging, a small Marina, also no dredging and back of house support areas.

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00:12:41.820 --> 00:12:54.720

Kim Prunty: Beach areas with beach chairs, an art and culture center, open air buildings for things like food and beverage and merchandise, cabanas, service roads, walking paths and future expansion areas.

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00:12:57.150 --> 00:13:06.450

Kim Prunty: This slide gives you an idea of how the project has evolved. On the far left, this is not a Disney project, this is the project I mentioned and reference that had

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00:13:06.930 --> 00:13:11.550

Kim Prunty: a significantly larger environmental impact, should it have been built.

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00:13:12.120 --> 00:13:20.610

Kim Prunty: The middle is where we were in 2019 and you can see, the biggest difference between that and the far right, which was in late 2020,

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00:13:20.970 --> 00:13:31.230

Kim Prunty: is in this Northwest quadrant where we discovered some sensitive habitats and cultural ruins, and as a result, moved some of this work to the eastern side of the property.

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00:13:31.860 --> 00:13:44.370

Kim Prunty: We also narrowed the pier. We've heard from many, many stakeholders that minimizing the marine impact was critically important and narrowing the pier has allowed us to reduce the impact by about 25%.

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00:13:47.400 --> 00:13:51.900

Kim Prunty: You can see this larger, I wish we were in person, and we can have a big board so everyone can see this closely,

74

00:13:52.380 --> 00:14:03.870

Kim Prunty: we've got some recreation areas, a service ramp, a marina, the security center I mentioned, the pier as well as the berth, that is capable of hosting only one ship,

75

00:14:04.710 --> 00:14:14.970

Kim Prunty: some cabanas in this area, this area around here and the South beach is a potential future expansion, these are the donated lands in the southern most point.

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00:14:15.690 --> 00:14:29.610

Kim Prunty: And then, this is the area where we will have many of those open air facilities, beach areas for our guests, the art and cultural center is right in the middle, and then you'll see this whole area here, which is the Disney donated lands.

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00:14:33.660 --> 00:14:38.070

Kim Prunty: We'll talk a bit more about this, but the design for the site is rooted in Bahamian culture.

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00:14:38.580 --> 00:14:49.560

Kim Prunty: And in reference to the environment, you can see that this is a conceptual image, the roofs of the building are not what you would consider typical, they're meant to evoke a spirit of the environment, as well as culture.

79

00:14:51.960 --> 00:15:04.410

Kim Prunty: When we integrate art into our projects it's not necessarily a picture on a wall. We try to look for ways to take an artist's idea and build it into the very architecture of our facilities.

80

00:15:05.040 --> 00:15:18.720

Kim Prunty: We are working now with Antonius Roberts and Kevin Cooper for beginning to bring more artists into the process whereby we pay them to produce designs for us that we can begin to integrate into our projects.

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00:15:21.750 --> 00:15:30.630

Kim Prunty: I always share this as a reminder of our commitments, through our Heads of Agreement with Government we committed to a \$250 to \$400 million investment.

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00:15:30.990 --> 00:15:37.590

Kim Prunty: That's not because of the size and scope of the project, it's because our commitment to low density development and sustainable building practices.

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00:15:38.130 --> 00:15:44.730

Kim Prunty: We committed to donating 190 acres plus another 205, 2.5 excuse me, 2.5 acres.

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00:15:45.090 --> 00:15:51.330

Kim Prunty: At the southern most point which will be conveyed to government, we talked about rooting the design in the stories and culture of The Bahamas.

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00:15:51.690 --> 00:15:57.720

Kim Prunty: At least 120 construction jobs with an overall ratio of 80% Bahamians over the life of construction.

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00:15:58.170 --> 00:16:04.950

Kim Prunty: At least 150 operations jobs well-paying and with benefits and the variety of disciplines and opportunity for advancement.

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00:16:05.520 --> 00:16:15.600

Kim Prunty: As a comparable at Castaway Cay we currently pay \$600 to \$700 per week for our employees and that type of compensation would continue at Lighthouse Point.

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00:16:16.050 --> 00:16:24.660

Kim Prunty: We have recently moved to 100% Bahamian employment at Castaway we are in that process right now and hiring for some additional roles.

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00:16:25.290 --> 00:16:35.100

Kim Prunty: We agreed to offer training and professional development programs, space for Bahamian vendors for the sale of authentic high quality Bahamian retail goods, services, etc.

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00:16:36.990 --> 00:16:46.020

Kim Prunty: Priority to Bahamian owners and operators to provide port adventures. Priority to Bahamian entertainers which just makes a lot of sense, given our commitment to rooting the experience

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00:16:46.380 --> 00:16:58.140

Kim Prunty: in the stories and culture and art of the Bahamas. Purchase Bahamian agricultural and seafood products. Numerous environmental protection measures. At least 30% of the energy demand from renewable energy,

92

00:16:58.530 --> 00:17:11.640

Kim Prunty: and we are working toward more than that at Castaway we are approximately 70% or will be within the next month or two from a renewable perspective, and then full access to the site for citizens and residents of the Bahamas for non-commercial purposes.

93

00:17:14.040 --> 00:17:19.170

Kim Prunty: The environmental commitments that we made early in this process were to develop less than 20% of the property.

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00:17:19.560 --> 00:17:28.680

Kim Prunty: Our current design calls for 16% of the acreage to be developed, far more will be donated, which is about 25% and left undeveloped which is 59%.

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00:17:29.490 --> 00:17:37.470

Kim Prunty: We committed to employing sustainable building practices. Examples are the open trestle pier, elevated walkways in several areas, as well as solar.

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00:17:38.070 --> 00:17:48.780

Kim Prunty: Develop and maintain environmental monitoring programs, before, during and after construction. We've already started that process which you'll hear more about and we've included Bahamians in that process.

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00:17:49.530 --> 00:18:04.680

Kim Prunty: Donating the land, we previously talked about that was privately owned. Education programs. We committed to minimize environmental impacts and appropriately mitigate unavoidable impacts and to complete a comprehensive EIA and EMP before beginning construction.

98

00:18:07.590 --> 00:18:18.450

Kim Prunty: Moving on to the EIA itself, so Disney Cruise Line has spent three, more than three years, working with a team of highly qualified and experienced scientists and other professionals to complete an EIA.

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00:18:18.990 --> 00:18:30.600

Kim Prunty: Field investigations have spanned 36 months in order to capture seasonal variations. Our first site visit was all the way in October of 2017 and we actually had people who were on the site today

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00:18:31.440 --> 00:18:37.710

Kim Prunty: participating in monitoring programs. The first draft of the EIA was submitted in December of 2019.

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00:18:38.190 --> 00:18:45.120

Kim Prunty: Since then, we have worked with first the BEST Commission and now the Department of Environmental Planning and Protection to make numerous technical revisions

102

00:18:45.480 --> 00:18:53.670

Kim Prunty: based on DEPP questions and comments and changes to applicable law. The EIA has also been updated based on additional field work and data collection.

103

00:18:54.690 --> 00:19:01.050

Kim Prunty: Disney Cruise Line has met with numerous stakeholders throughout this process, including the residents of Eleuthera, The Bahamas National Trust

104

00:19:01.380 --> 00:19:07.440

Kim Prunty: and other respected environmental and conservation NGOs, as well as other stakeholders in The Bahamas more broadly.

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00:19:07.890 --> 00:19:16.260

Kim Prunty: The relevant feedback, in many cases has been addressed in the EIA. Examples of adjustments that have been made, both as a result of these conversations

106

00:19:16.560 --> 00:19:23.880

Kim Prunty: and ongoing EIA fieldwork, include things like providing meaningful access to the site for citizens and residents of The Bahamas.

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00:19:24.360 --> 00:19:33.570

Kim Prunty: Through many, many conversations with our future neighbors in Eleuthera we learned how very important this was and so we've continued to provide that as part of this project.

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00:19:33.990 --> 00:19:43.620

Kim Prunty: We also heard from the residents of Eleuthera the importance of maintaining a public road. Those of you who've been there recently know what disrepair the road is currently in, and that will obviously be

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00:19:44.190 --> 00:19:54.930

Kim Prunty: improved. We talked already about narrowing the pier to reduce the marine impacts. I also talked about the Northwest area where we've moved things due to sensitive habitats and historical ruins.

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00:19:55.470 --> 00:20:07.830

Kim Prunty: And then adjusting development plans due to a variety of things in this case it was the south beach area due to the piping plover. Additionally we've been asked to review key species of importance, and we have continued to do that.

111

00:20:09.480 --> 00:20:11.400

Kim Prunty: And with that I will turn it over to Dr Mark.

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00:20:12.750 --> 00:20:22.740

Dr. Mark Penning: Thank you, Kim I want everyone to know that, on the very first conversation we had about Lighthouse Point, we said that we as Disney would not move forward

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00:20:23.490 --> 00:20:32.880

Dr. Mark Penning: Unless we could do so in an environmentally responsible way, and this EIA conducted by a team of experts shows us that we can do that.

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00:20:33.840 --> 00:20:39.420

Dr. Mark Penning: This project is not expected to result in the loss of marine or terrestrial biodiversity.

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00:20:39.900 --> 00:20:51.480

Dr. Mark Penning: The points you see on this page are highlights, and I'll go through them in detail in just a moment, but just to call out there are no unique marine habitats or species in the development footprint.

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00:20:52.050 --> 00:21:03.420

Dr. Mark Penning: And there are no coral reefs in the footprint, they are no patch reefs either. When you add on a 75 foot buffer on either side of the pier.

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00:21:03.810 --> 00:21:14.520

Dr. Mark Penning: And you think about the extent of the pier itself that total space will result in around about 1/10 of an acre of coral that we will mitigate.

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00:21:15.240 --> 00:21:30.750

Dr. Mark Penning: We intentionally placed the pier in such a way that it would have the least harm possible and it's designed as an open trestle pier so that we will not have to dredge at all. On land, all the species that were observed are um

119

00:21:32.280 --> 00:21:42.750

Dr. Mark Penning: found in the approximately 80% or even more of the property that is not going to be developed. There are some ruins, we'll talk a little about that in just a moment.

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00:21:44.220 --> 00:21:52.140

Dr. Mark Penning: We first looked at Lighthouse Point and the space around Lighthouse Point to see what is there, we wanted to know what we had to deal with.

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00:21:52.560 --> 00:22:04.470

Dr. Mark Penning: And there, we did this over a period of three years, so we studied extensively the benthic habitat types looking at what corals were there, what species of fish, we found sea turtles,

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00:22:04.860 --> 00:22:15.060

Dr. Mark Penning: no sign of sea turtle nesting but we're still looking, and then spawning aggregations that we've heard about, we did not see but we're continuing to study.

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00:22:17.490 --> 00:22:36.750

Dr. Mark Penning: Talking about the impacts that space covered by the pier is approximately five acres. If you think of shading underneath the pier structure, so that's about three and a half acres of hard bottom habitat and then about one and a half acres of sand.

124

00:22:39.390 --> 00:22:50.850

Dr. Mark Penning: When you look at corals and coral reefs, we do not have coral reefs in that space. What do you see there reflects that habitat that we have chosen and again.

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00:22:51.930 --> 00:23:03.480

Dr. Mark Penning: when you add a 75 foot barrier, a buffer zone, on either side of that Pier we're still looking at 1/10 of an acre of coral that we will mitigate.

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00:23:04.860 --> 00:23:18.120

Dr. Mark Penning: We also know that there's a small proportion of those that are endangered, but we feel comfortable, knowing that the patch reefs and fore reefs are at least 500 feet away from the structure.

127

00:23:20.850 --> 00:23:38.130

Dr. Mark Penning: We did an engineering analysis to make sure that the pier is not going to cause backup of sand. We wanted sediment to be able to move through, and also the same for fish and benthic species. The small marina the same, we do not expect any significant long term sand accumulation.

128

00:23:39.270 --> 00:23:49.950

Dr. Mark Penning: And then, just to be clear, the cruise vessel will come in from the deepwater offshore to the east coast and we'll cross over between Half Moon Cay and Lighthouse Point over the bridge.

129

00:23:50.640 --> 00:24:05.040

Dr. Mark Penning: Which is no shallower than 80 feet and the cruise ship's draft is 27 feet, so there's more than enough space and that place is used already for privately owned cruise ships.

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00:24:06.180 --> 00:24:19.680

Dr. Mark Penning: So the mitigation and our team is focused on moving coral species that are the larger stony corals that have a high rate of success being relocated.

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00:24:20.100 --> 00:24:27.540

Dr. Mark Penning: We know this because we already do it, we have a coral nursery and a rehabilitation program in Abaco.

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00:24:28.110 > 00:24:40.620

Dr. Mark Penning: And we have a 90% success rate with those over a decade it's a very comprehensive program and we feel very confident about it. We've not seen sea turtle nesting

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00:24:41.190 --> 00:24:56.610

Dr. Mark Penning: on the beaches there, but if nesting does occur, we are very lucky in being able to manage an existing sea turtle nesting beach here in Florida associated with our Vero Beach Resort, which is the most

134

00:24:58.680 --> 00:25:05.130

Dr. Mark Penning: most used loggerhead sea turtle nesting beach in the world and we manage that.

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00:25:06.090 --> 00:25:14.100

Dr. Mark Penning: And have done so for a decade already and we feel very confident about being able to mitigate should they be using the beach.

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00:25:14.820 --> 00:25:22.620

Dr. Mark Penning: As far as marine mammals are concerned, we will implement Best Management Practices, visual monitoring of course scaled noise intensity.

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00:25:23.070 --> 00:25:37.380

Dr. Mark Penning: And things like that and, most importantly, an education program on Best Management Practices that we can share with our guests crew and of course vendors as well. We've heard about fish migration corridors

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00:25:37.740 > 00:25:51.900

Dr. Mark Penning: and specifically talking about bonefish with bonefish experts, and of course we're going to continue the work that we've already started as we go through the construction phase and into operation.

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00:25:54.600 --> 00:26:04.110

Dr. Mark Penning: Looking on land and also over a three year period, we had experts study the spaces, there we looked at the vegetation types

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00:26:04.770 --> 00:26:12.120

Dr. Mark Penning: very carefully. We know that the broad leaf evergreen forest or the coppice covers approximately half of that property.

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00:26:12.690 --> 00:26:25.890

Dr. Mark Penning: Just under 30% is the sand strand. We found those four species listed there the Blolly, Lignum Vitae, Mahogany and Horseflesh on the protective tree order, we found those there. Interestingly

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00:26:26.580 --> 00:26:36.510

Dr. Mark Penning: a lot of those in the Northwest quadrant and so again that made us change our plans completely and we relocated what had been allocated to that space.

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00:26:36.930 --> 00:26:48.300

Dr. Mark Penning: There are two invasive plant species of real interest the Casuarina, there's about 22 acres of it. We will mechanically remove much of that, and

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00:26:48.870 > 00:27:01.170

Dr. Mark Penning: we can't promise to remove all of it it's really difficult but, but we will certainly use that then for mulching and various other things, and you know potentially.

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00:27:02.310 --> 00:27:10.290

Dr. Mark Penning: charcoal use or something like that, but we want to manage the Casuarina and then of course the scavola white inkberry on the dunes.

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00:27:13.080 --> 00:27:23.460

Dr. Mark Penning: The avian surveys more than 100 species of birds found, of course, White Pond has got a lot of diversity there. The birds that we focused on and, most importantly, were

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00:27:23.730 --> 00:27:41.610

Dr. Mark Penning: a small little group of piping plovers on the Bottle Bay Beach and we redesigned how we were thinking of using that space to accommodate those little birds, and we also looked at the Great Lizard Cuckoos and the Kirtland's Warbler that have generated a lot of interest in that space.

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00:27:44.490 --> 00:27:50.070

Dr. Mark Penning: Other fauna as well as listed there. What the specialist team told us really is that

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00:27:50.850 --> 00:28:05.250

Dr. Mark Penning: that the species that we've found, they've got more than enough space to move out into the rest of the undeveloped area, remember that we are looking at an approximately 16%.

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00:28:05.970 --> 00:28:22.170

Dr. Mark Penning: of that area that will be developed and there is a lot of space remaining for those birds to retreat to and, in fact, some of the species like Kirtland's Warbler will probably benefit from the more broken up land in those spaces that are developed.

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00:28:26.460 --> 00:28:33.150

Dr. Mark Penning: And the keystone around any program like this is of course monitoring, monitoring, monitoring, so we've already started that

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00:28:33.900 --> 00:28:45.420

Dr. Mark Penning: and we plan to continue throughout the construction and into the operations phase and using very talented Bahamians to help us with this work, of course.

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00:28:45.810 --> 00:29:03.780

Dr. Mark Penning: And we will work with the government agencies on anything like the removal of trees, or you know anything else that needs to be done in that respect, and we just plan to work with all relevant government parties and agencies and do the best we can, with that side.

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00:29:07.140 --> 00:29:08.760

Dr. Mark Penning: So let me hand back to Kim.

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00:29:10.020 --> 00:29:19.260

Kim Prunty: From a cultural resources perspective, the surveys were completed in February 2019 in January 2020. We also did a site visit with the AMMC.

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00:29:19.590 --> 00:29:27.570

Kim Prunty: There were nine ruins and several ancillary features on site predominantly in the northern area of the property and the vicinity of Old Bannerman Town.

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00:29:27.960 --> 00:29:37.680

Kim Prunty: We've talked about moving development away from these areas so there's no anticipated impacts to these structures and no plans to develop where any of these structures are located.

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00:29:40.350 --> 00:29:48.900

Kim Prunty: From an economic impact perspective, a study was conducted by Oxford Economics, which has completed many similar studies and The Bahamas.

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00:29:49.380 --> 00:29:59.100

Kim Prunty: You can see what the study shows, but over a 25 year time horizon a more than \$800 million increase in Bahamian GDP and a more than \$355 million increase.

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00:29:59.400 --> 00:30:08.130

Kim Prunty: In Bahamian government revenues which exceeds concessions, the only concessions that were requested or part of existing government acts, there were not additional concessions requested.

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00:30:08.520 --> 00:30:16.680

Kim Prunty: We will have a delay due to the pandemic, site work, and that's after all approvals have been granted from every relevant agency,

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00:30:17.040 --> 00:30:24.390

Kim Prunty: is expected to begin in 2021 likely toward the end of the year, with opening slated in the first half of 2024.

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00:30:25.050 --> 00:30:33.810

Kim Prunty: What's been particularly important for us with this project based on the many people that we've talked to in Eleuthera is how do we maximize participation.

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00:30:34.110 --> 00:30:43.140

Kim Prunty: I'm going to give you some examples of that. So we have toured construction sites prior to the pandemic and met with contractors across Eleuthera. We've spent

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00:30:43.590 --> 00:30:48.300

Kim Prunty: A considerable amount of time with the Bahamian Contractors Association, the Society of Engineers.

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00:30:48.660 --> 00:30:59.790

Kim Prunty: other industry organizations and we have hosted multiple information sessions in Eleuthera and Nassau to maximize opportunities for Bahamian contractors. We will continue to do that.

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00:31:00.300 --> 00:31:14.640

Kim Prunty: Numerous local contributors participated in the EIA. Through our monitoring programs there will be staff roles requiring environmental expertise. In a minute I will introduce you to the many people who have contributed to this effort.

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00:31:15.120 --> 00:31:28.050

Kim Prunty: The geotechnical work that was part of our environmental review was conducted by ENCO International, Carlos Palacios' organization, and then the construction of the Small Business Development Centre was completed by Bahamians.

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00:31:29.310 --> 00:31:38.610

Kim Prunty: We have held, prior to the pandemic, numerous information sessions and have met with hundreds of potential employees, vendors, tour operators and others

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00:31:39.030 --> 00:31:52.890

Kim Prunty: over the past few years to build relationships and maximize opportunities. I spoke a little bit earlier about the Eleuthera Business Hub that facility is in Rock Sound, it is now open though limited capacity as a result of COVID-19.

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00:31:54.510 --> 00:32:08.880

Kim Prunty: We are about to release information about grant programs for Central and South Eleuthera to enable businesses to get ready and to use the resources and mentoring and that's available at the Eleuthera Business Hub.

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00:32:09.330 --> 00:32:17.910

Kim Prunty: We mentioned the art program, so we are working with Antonius Roberts and Kevin Cooper in Eleuthera and will continue to work with them as we bring more artists into this project.

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00:32:18.870 --> 00:32:26.670

Kim Prunty: We really want to provide as many training and development programs, as necessary, so that we can have 100% Bahamian employment

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00:32:27.090 --> 00:32:37.800

Kim Prunty: and jobs for the people of Eleuthera. We've worked with the Ministry of Labour and the University of the Bahamas and the National Training Agency, and Bahamas Technical and Vocational Institute,

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00:32:38.130 --> 00:32:44.250

Kim Prunty: so that people are ready to take advantage of the opportunities that this project and others and Eleuthera will provide.

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00:32:45.750 --> 00:32:53.370

Kim Prunty: And with that I am sharing our list of local consultants, as well as others who have contributed to the process.

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00:32:54.270 --> 00:33:06.510

Kim Prunty: So I will introduce those who are able to participate in our Q&A session today and I will ask them to turn on their video and to

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00:33:07.410 --> 00:33:22.380

Kim Prunty: make themselves available by unmuting if a question is asked. So you've already met Dr Mark Penning we also have Dr Andy Stamper, who is the manager of Conservation Science for Disney. We have Claire Martin, who is the senior manager of Disney Conservation.

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00:33:23.400 --> 00:33:35.250

Kim Prunty: David Chiaradonna, who is our senior project manager at Walt Disney Imagineering. Melissa Alexiou of Waypoint Consulting in The Bahamas, who is our environmental consultant and environmental manager.

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00:33:36.690 --> 00:33:48.990

Kim Prunty: Greg Braun, who, on behalf of a team conducted marine and coral studies. Colin Brooker, who is a historian. Tanya Ferguson, who helps lead botanical and field investigations.

181

00:33:49.860 --> 00:34:02.610

Kim Prunty: Latesha Gibson who also led avian and botanical field investigations. Dr. Phil Kramer who led our coral assessment using the AGRRA method, as well as coastal movements of water and marine generally.

182

00:34:03.690 --> 00:34:15.150

Kim Prunty: Predensa Moore who led our avian field investigations. Pete Peterson of ATM who compiled the reports. Zach Sears of Oxford Economics, who developed our economic impact study.

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00:34:20.790 --> 00:34:23.310

Kim Prunty: And with that Director Newbold we turn it back over to you.

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00:34:26.160 --> 00:34:41.580

Director Newbold: Alright Thank you so much for that introduction and presentation So, ladies and gentlemen, I will now indicate that there are 324 persons on the calls and we have had, um,

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00:34:42.330 --> 00:34:54.630

Director Newbold: the chat has been very active and we have had several questions being placed in the chat group. I will open the floor by virtue of a raising of your hands.

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00:34:55.200 --> 00:35:09.510

Director Newbold: Anybody who has a question that they would now like to present. We have 40 minutes for our question and answer period. I see Silas, and I do apologize to everyone should I mispronounce your name.

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00:35:10.590 --> 00:35:15.840

Director Newbold: Silas Cooper you can unmute your MIC and take the floor, please.

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00:35:16.440 --> 00:35:23.010

Silas V. Cooper: Good evening, as the Silas Cooper, I'm sorry, good evening. I have a question with respect to the progress

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00:35:24.180 --> 00:35:26.850

Silas V. Cooper: for Miss Kim can you speak towards

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00:35:28.710 --> 00:35:29.190

Silas V. Cooper: the

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00:35:30.570 --> 00:35:32.340

Silas V. Cooper: selection of the contractors.

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00:35:33.510 --> 00:35:34.830

Silas V. Cooper: Can you speak to us about that, please?

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00:35:36.750 --> 00:35:41.220

Kim Prunty: Dave, I think that question is probably more in your area with project management.

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00:35:41.670 --> 00:35:57.180

David Chiaradonna: Sure yeah I'll speak to that one. So right now we are still out in a competitive bid environment, we will be looking to currently select the contractor around mid to end of May to develop the project.

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00:35:58.050 --> 00:36:01.320

Kim Prunty: And Dave do you want to talk a little bit about the design builder format?

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00:36:02.130 --> 00:36:05.070

David Chiaradonna: Sure yeah just the way we're treating the project.

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00:36:05.250 --> 00:36:06.210

INAUDIBLE

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00:36:09.030 --> 00:36:09.990

David Chiaradonna: Sorry Director Newbold?

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00:36:10.530 --> 00:36:11.670

Director Newbold: I'm sorry you go ahead.

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00:36:12.870 --> 00:36:25.050

David Chiaradonna: The way we are treating the contracting method for the project is via a design build, which means that we will hire a general contractor that will be responsible for the design and the construction of the project.

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00:36:25.800 --> 00:36:35.460

David Chiaradonna: That means they will have the architect engineer of record under their purview. What we've given them is a very robust RFP or request for proposal for the project

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00:36:35.910 --> 00:36:51.360

David Chiaradonna: that will allow them to come up with it means and methods to use sustainable practices, sustainable building practices, all the things we're looking at to develop the project with a very light footprint and very light touch to the environment and the land side portion.

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00:36:58.200 --> 00:37:05.910

Director Newbold: Thank you um the next person we have is Sam Brown, can you, you can mute your MIC.

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00:37:07.950 --> 00:37:09.180

Sam Brown: Hi how are you?

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00:37:11.490 --> 00:37:21.090

Sam Brown: I just have a question more on the economic side of things so Disney has promised 150 jobs are these jobs committed to Bahamians?

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00:37:23.040 --> 00:37:32.220

Kim Prunty: Yes, they are, so at least 150 jobs for Bahamians it's in a variety of roles, these are jobs that are well paying and benefits and with benefits.

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00:37:32.700 --> 00:37:45.570

Kim Prunty: As I mentioned, \$600 to \$700 weekly, which is above the average and it's similar to what we're doing at Castaway. We previously had about 150 jobs for Bahamians at Castaway.

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00:37:45.990 --> 00:37:53.250

Kim Prunty: We're moving toward 100% Bahamian and I think that there's that is completely possible at Castaway as well as at Lighthouse Point.

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00:37:56.010 --> 00:38:02.760

Director Newbold: Thank you, next we have Demarco Mott, please unmute your MIC.

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00:38:05.010 --> 00:38:15.210

Demarco Mott: Yes, good evening I'm Demarco from the island of Grand Bahama, one of the questions that I have for the entire group that's doing this study and all the wonderful things.

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00:38:16.320 --> 00:38:27.510

Demarco Mott: The things that I noticed from the impact assessment itself, you know the plan and so is that there's a lot of conversation on minimum environmental impact here.

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00:38:28.020 --> 00:38:36.810

Demarco Mott: Minimum environmental impact there. When we add all those minimum up that becomes a major environmental impact for the island of Andros.

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00:38:37.290 --> 00:38:48.240

Demarco Mott: And the question I mean that keeps coming through my head is why did we choose Andros and why did we choose to say you know it's minimum of this impact, minimum that?

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00:38:48.690 --> 00:38:55.950

Demarco Mott: You are unsure about any turtles or if they have any nests there. If there's so many you know uncertainties

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00:38:56.700 --> 00:39:08.190

Demarco Mott: why are we choosing to do this project in Andros? And Bahamians we love on this we give Andros a different appreciation, because that is our life that's the center of

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00:39:09.150 --> 00:39:19.080

Demarco Mott: our country. So in general, why Andros and all these uncertainties are leaving me to wonder, you know that that's not very safe in my understanding.

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00:39:20.580 --> 00:39:30.900

Director Newbold: All right, Mr. Demarco let me assure you that the project is not directed at the island of Andros, this is a project that's identified for Eleuthera.

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00:39:33.270 --> 00:39:37.590

Director Newbold: Next, we have John, John can you unmute your MIC please.

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00:39:42.600 --> 00:39:43.500

John: Okay, can you hear me.

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00:39:44.280 --> 00:39:45.210

Director Newbold: We can hear you, sir.

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00:39:45.870 --> 00:39:49.560

John: Very good um my name is John McDougal on a property up on

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00:39:50.850 --> 00:40:05.010

John: North Eleuthera and I'm more interested in the design phase, because it's just as announced that this is design build, so the open trestle bridge the number of bents and piles and depth of piles has not been determined yet.

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00:40:07.500 --> 00:40:20.250

David Chiaradonna: That is correct, it has not been determined yet. That's what will be looking at is part of the design build techniques, so you know, the goal here I'll just be transparent as possible is to increase the spans as um

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00:40:21.150 --> 00:40:28.020

David Chiaradonna: to get as much distance out of those spans so we can limit every piece of impact on that sea floor.

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00:40:30.090 --> 00:40:31.650

John: My next question would be.

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00:40:32.970 --> 00:40:44.850

Director Newbold: Sir, I'm sorry, sir, as we have a 40 minute time limit I'm going to ask you to join the line that I could give everybody the opportunity. Next we have Dr Ancelino Davis, please unmute your MIC.

227

00:40:46.530 --> 00:40:48.930

Dr. Leno Davis @SciPerspective: Hi good evening everyone, thank you for the presentation.

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00:40:49.980 --> 00:40:59.100

Dr. Leno Davis @SciPerspective: My question is specifically directed to Phil Kramer I know you have significant experience in the Caribbean

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00:40:59.460 --> 00:41:09.660

Dr. Leno Davis @SciPerspective: and I would like to know how the coral reefs that you surveyed with AGRRA in the area actually compare to the other coral reefs throughout The Bahamas.

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00:41:10.260 --> 00:41:27.990

Dr. Leno Davis @SciPerspective: Within the AGRRA framework and for the rest of the team, the \$60M per year direct spending, I want to know if your economic analysis showed what that is per guest and how that compares to other hotel expenditure in The Bahamas.

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00:41:35.190 --> 00:41:37.830

Dr. Phil Kramer: Kim do you want me to respond here directly?

Kim Prunty: Sure

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00:41:42.090 --> 00:41:47.610

Dr. Phil Kramer: Hi Leno, good to hear from you. So, let me just kind of clarify something up front

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00:41:48.780 --> 00:41:53.940

Phil Kramer: and that is that you know the direct impact area on this development is

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00:41:54.390 --> 00:42:03.690

Phil Kramer: predominantly a hard bottom area and that's a coral community so it's not that there's no corals there, there are corals there but it's not a coral reef.

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00:42:04.050 --> 00:42:20.640

Phil Kramer: A coral reef is something that is basically able to build structure, grow up towards sea level, and there are coral reefs in the greater Lighthouse Point area, but not in the footprint, where the trestle has been proposed, and it was partly moved and located because of that.

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00:42:21.750 --> 00:42:26.550

Phil Kramer: In response to your question, and so, just to clarify there the coral community

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00:42:27.150 --> 00:42:42.240

Phil Kramer: and there's five hard bottom types that we identified the average coral cover in those in that hard bottom community is you know between 0.5 and 1.5- 2% max of live coral cover.

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00:42:43.200 --> 00:42:54.510

Phil Kramer: When it comes to a broader coral reefs in the Lighthouse Point area their best developed over on the east side of South Eleuthera.

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00:42:55.200 --> 00:43:05.760

Phil Kramer: Where the wave energy is much greater and currents are greater and you do have patch reefs on the southern side as well as well as a coral reef wall, we surveyed.

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00:43:06.570 --> 00:43:18.030

Phil Kramer: All of those predominantly the patch reefs and the fore reefs structures, most of those are using the AGRRA sort of standard for conditions

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00:43:18.990 --> 00:43:23.760

Phil Kramer: are fair, they have about 10% coral cover, I think the most coral cover we measured

242

00:43:24.180 --> 00:43:34.740

Phil Kramer: was on a fore reef site on the east southeast side, and I think we got up to maybe 12% or 13% live coral cover. That's pretty typical of Bahamas reefs today so.

243

00:43:35.250 --> 00:43:48.870

Phil Kramer: Certainly, in the past, when I first started surveying reefs, we had easily reefs measuring 30% that's no longer the case today, unfortunately 10% is about average. So I would say the

244

00:43:49.530 --> 00:43:57.780

Phil Kramer: you know the true coral reefs in the Lighthouse Point area are typical of what you see in much of the Bahamas today.

245

00:44:02.160 --> 00:44:02.970

Director Newbold: Thank you.

246

00:44:04.260 --> 00:44:09.090

Director Newbold: Next, we have Miss Casuarina McKinney Lambert please unmute your MIC.

247

00:44:13.740 --> 00:44:23.190

casuarinamckinney: Good evening everyone, this is Casuarina and I'm speaking on behalf of BREEF, ReEarth, Save the Bays, Water Keepers Bahamas and Water Keepers Alliance,

248

00:44:23.760 --> 00:44:26.580

casuarinamckinney: partners in the last chance for Lighthouse Point campaign.

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00:44:27.180 --> 00:44:36.150

casuarinamckinney: Almost two years ago, our organizations which have decades of experience on the environmental issues that are being raised tonight and have been for quite some time,

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00:44:36.780 --> 00:44:44.610

casuarinamckinney: we wrote to Disney and offered to cooperate with them to ensure that the EIA meet the high standards expected of such a well-known company.

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00:44:45.480 --> 00:44:53.070

casuarinamckinney: We have been rebuffed and brushed aside. This is something that needs to be addressed, no matter where the project is located.

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00:44:53.850 --> 00:44:59.730

casuarinamckinney: This project is a major decision for the future of Eleuthera and for The Bahamas as a whole.

253

00:45:00.180 --> 00:45:10.110

casuarinamckinney: And I want to just point out that the our campaign petition for a better option for Lighthouse Point that really looks at potential alternatives

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00:45:10.560 --> 00:45:22.470

casuarinamckinney: has garnered over 440,000 signatures. The whole of The Bahamas and the world is watching this process and we believe that there's a huge opportunity for Disney and The Bahamas

255

00:45:22.860 --> 00:45:34.350

casuarinamckinney: to show a transformative leader, leadership, to build back better. The world has changed and we need something that has more benefits for Eleuthera and The Bahamas.

256

00:45:35.040 --> 00:45:45.120

casuarinamckinney: I think, irrespective of any of our views of this current proposal, we can all agree that Disney and the Government must complete conduct a science based credible EIA.

257

00:45:45.720 --> 00:45:56.250

casuarinamckinney: In order to make a rational decision about such a huge project in such an iconic location. Based on number of expert reviews and I know we have a very short amount of

258

00:45:59.220 --> 00:46:02.850

Director Newbold: Your minute has expired, and we have not heard a question.

259

00:46:03.510 --> 00:46:17.640

Director Newbold: We don't have problems with your position, but you would need to put that in the chat or send it as you said that we would like to get the questions that are questioning the quality of the EIA such that we can identify issues and...

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00:46:18.210 --> 00:46:18.990

casuarinamckinney: OK, So my question.

261

00:46:20.220 --> 00:46:24.030

casuarinamckinney: What I'm looking at is I'm asking for the

262

00:46:25.380 --> 00:46:38.670

casuarinamckinney: unsubstantiated claims on the economic benefits the economic assessment was done well before COVID and so I'm asking for an economic assessment that reflects the current economic reality.

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00:46:39.180 --> 00:46:47.430

casuarinamckinney: I'm also on for questions on how climate change is being addressed I didn't see that in the EIA adequately addressed.

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00:46:47.700 --> 00:46:58.590

Director Newbold: Ok I'm gonna have to cut you off the points been made. You can join the line, after again to come up with any additional questions, but I have to be fair and transparent to everybody in the process.

265

00:46:59.310 --> 00:47:07.290

Director Newbold: Okay, thank you. So economics anybody wouldn't make comments the economics query that she read?

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00:47:08.370 --> 00:47:10.680

Kim Prunty: So Zach would you mind answering that question?

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00:47:12.060 --> 00:47:17.640

Zachary Sears: Hi, sure thing. Zachary Sears I'm an economist with Oxford Economics I'm happy to take that question.

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00:47:19.590 --> 00:47:27.870

Zachary Sears: So the current situation with COVID there's a couple of reasons why we think the analysis that was done a few years ago, still holds.

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00:47:29.700 --> 00:47:40.980

Zachary Sears: And there's really two parts, I think, to think about one is that this analysis takes a long term perspective. We took we took this out to over 25 years.

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00:47:41.940 --> 00:47:51.210

Zachary Sears: And generally, I think the reasonable expectation here is that COVID is a short term dynamic, it is a public health situation.

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00:47:51.630 --> 00:48:01.890

Zachary Sears: We have all the confidence in the world that there will be a public health remedy here in the short term, and this analysis looks well beyond that. The second

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00:48:02.760 --> 00:48:13.680

Zachary Sears: thing to think about is that the way that the analysis was conducted is it is a spending based approach. It is based on all of the construction and development spending

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00:48:14.370 --> 00:48:29.550

Zachary Sears: that is planned, and then also our estimates of onshore visitor spending. And what we do is we take that spending and we estimate the benefits, above and beyond a baseline. So

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00:48:30.030 --> 00:48:38.910

Zachary Sears: what that baseline is, is less important. So right now in the short term, clearly that baseline economy is at a lower level.

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00:48:39.540 --> 00:48:55.260

Zachary Sears: That is true. But if the spending occurs that we expect it to at that level, then the benefit from the project would still be the same, the increment, the project increment would still be there, regardless of that baseline, what level the baseline is at.

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00:48:58.320 --> 00:49:07.620

Director Newbold: Okay, thank you. Can I have Scott, and I'm not gonna try to say your name Scott, Scott Tiegs can you unmute your MIC.

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00:49:10.590 --> 00:49:17.790

Scott Tiegs: Scott Tiegs pretty close, thank you very much. Yeah my name is Scott Tiegs. I'm a biology professor at Oakland University in Michigan.

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00:49:18.210 --> 00:49:26.160

Scott Tiegs: I have a PhD in aquatic ecology and I specialize in human impacts to aquatic ecosystems. As I was looking through the assessment, I noticed that

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00:49:26.760 --> 00:49:32.070

Scott Tiegs: it states that no bonefish have been cited on Lighthouse Point and I thought that was strange because

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00:49:32.550 --> 00:49:37.650

Scott Tiegs: I've visited that area, many times I've been coming to Eleuthera for over 10 years and in fact I

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00:49:38.370 --> 00:49:45.780

Scott Tiegs: Bring groups of students there as part of a marine ecology class and we routinely see bonefish in this area. They're all over the place.

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00:49:46.110 --> 00:49:54.330

Scott Tiegs: And so my question is well I wish that, by the way, I wish, there was an ecologist on the call that Disney had put forth because I haven't been an appropriate person to whom I could direct this question.

283

00:49:54.690 --> 00:50:10.170

Scott Tiegs: But my question for whoever wants to tackle it is you know how you could have missed this very obvious and conspicuous species that's an obvious economic concern for the island of Eleuthera and does that speak to the thoroughness of the surveys that you have performed to date?

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00:50:15.960 --> 00:50:16.290

Kim Prunty: So, Dr. Kramer.

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00:50:17.010 --> 00:50:17.820

Dr. Andy Stamper: I'll take that one.

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00:50:19.050 --> 00:50:35.790

Dr. Andy Stamper: Yeah it just happens that because we have to report exactly what we see in the EIA, we did not see it during those surveys. We do state that we do feel that they're in the area and we're working with the Bonefish & Tarpon Trust.

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00:50:37.290 --> 00:50:40.620

Dr. Andy Stamper: And we've been talking to them. We've looked at all their materials

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00:50:41.850 --> 00:50:48.570

Dr. Andy Stamper: the publications and we know that in the area. We do have plans in the fall to tag fish

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00:50:49.590 --> 00:50:54.180

Dr. Andy Stamper: to understand exactly how they use that area. There's also

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00:50:55.290 --> 00:51:08.070

Dr. Andy Stamper: mechanisms. One of the biggest concerns from the bonefish trust is the marina and we have discussed with them exactly how we can mitigate that. They've given feedback and we have incorporated that

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00:51:08.850 --> 00:51:18.840

Dr. Andy Stamper: When we do build the Marina to assure that they can transfer through. We're also looking at corridors underneath the, underneath the trestle.

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00:51:19.380 --> 00:51:30.030

Dr. Andy Stamper: Those are kind of experimental at this point, but we are we're looking at where we need to have some time to tag in that in that exact area, to make sure that

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00:51:31.050 --> 00:51:34.350

Dr. Andy Stamper: we know exactly how they're utilizing that, that point.

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00:51:37.980 --> 00:51:48.600

Director Newbold: Thank you. Scott, may I clearly make known to you at this time, if you are indeed in possession of data relative to the gap that you have identified in this

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00:51:49.500 --> 00:51:55.650

Director Newbold: but relative to this project on the screen, please provide the information directly to the government, such that it would be

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00:51:56.250 --> 00:52:08.430

Director Newbold: taken in consideration with the information provided. We appreciate that. Next can I get Tyson J Dimmock. Tyson J, could you please unmute your MIC, thank you.

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00:52:16.860 --> 00:52:17.790 Director

Newbold: Tyson J?

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00:52:19.500 --> 00:52:24.360

Director Newbold: Alright, and interest of time Beth Hall, can you please unmute your MIC. Beth Hall.

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00:52:28.200 --> 00:52:28.680

Beth Hall: Good evening.

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00:52:29.940 --> 00:52:31.530

Beth Hall: Um can you hear me.

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00:52:32.040 --> 00:52:32.850

Director Newbold: We can hear you.

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00:52:33.600 --> 00:52:41.130

Beth Hall: Okay, good evening everyone, and um thank you um. You said that there were going to be over 150

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00:52:42.780 --> 00:52:52.470

Beth Hall: jobs for Bahamians when this whole entire project, if it goes through as it is tabled, is in it's completed.

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00:52:54.420 --> 00:52:59.010

Beth Hall: In its completeness, how many jobs will there actually be in total, for all your employees?

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00:53:03.930 --> 00:53:05.100

Beth Hall: Who would like to answer that question?

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00:53:08.100 --> 00:53:10.470

Kim Prunty: I'm not sure I completely understand the question.

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00:53:10.800 --> 00:53:12.840

Beth Hall: So let me, let me just say.

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00:53:12.870 --> 00:53:20.250

Beth Hall: Let me just say it again, so it has been stated that there will be right over 150 jobs.

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00:53:21.510 --> 00:53:27.210

Beth Hall: For Bahamians. When this whole thing is completed at Lighthouse Point um

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00:53:28.230 --> 00:53:30.750

Beth Hall: in its entirety, how many um

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00:53:31.770 --> 00:53:33.630

Beth Hall: employees will you have?

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00:53:35.340 --> 00:53:42.330

Kim Prunty: So we will have more than 150, at least 150 employees, at Lighthouse Point.

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00:53:42.510 --> 00:53:45.720

Kim Prunty: So that's.

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00:53:45.930 --> 00:53:47.310

Beth Hall: Only going to be Bahamians?

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00:53:47.520 --> 00:53:55.080

Kim Prunty: Can I please finish?

Beth Hall: Yes

Kim Prunty: So we will have at least 150 jobs at the site, the intention is to have those filled with Bahamians.

316

00:53:55.680 --> 00:54:06.390

Kim Prunty: But that's just working for Disney Cruise Line. We anticipate many other jobs in the form of vendors, who provide services and who provide jobs,

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00:54:06.990 --> 00:54:14.610

Kim Prunty: services and goods, to the operation. We anticipate jobs being generated by our port adventures and tour operators.

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00:54:15.330 --> 00:54:24.000

Kim Prunty: We anticipate jobs being created by the artisans and others who will bring their goods to be sold at the site.

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00:54:24.360 --> 00:54:35.940

Kim Prunty: And we like to have interactive experiences for our guests, so we anticipate that people won't just sell their goods they'll show guests, how to make them and provide an interactive experience for them to do that so.

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00:54:36.360 --> 00:54:42.510

Kim Prunty: The at least 150 jobs are specific to Disney and we think it will actually be more than that, but

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00:54:42.780 --> 00:54:52.770

Kim Prunty: we don't want to over promise and under deliver, so we have said, at least 150 and then we anticipate numerous other jobs from service providers, port adventures,

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00:54:53.280 --> 00:55:08.820

Kim Prunty: etc., which is why the investment and the Small Business Development Centre and Eleuthera Chamber with the Eleuthera Business Hub is so important. Because, if we're not going to open until 2024 these, this gives people time now to prepare for the opportunities that will be available.

323

00:55:10.500 --> 00:55:11.940 Beth

Hall: Okay, so so.

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00:55:13.080 --> 00:55:19.740

Director Newbold: Sorry, as I said previously, thank you, thank you Liza Rizzo can you unmute your MIC please.

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00:55:22.500 --> 00:55:32.070

Liza Rizzo: Hi um you mentioned that you were providing 100 or, excuse me \$1 million to small businesses, over the course of three years. \$333,000 a year.

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00:55:32.580 --> 00:55:41.640

Liza Rizzo: For a company with a market cap of over 300 billion, I think that that's seemingly insulting to Eleuthera. How did you only come up with a million dollars for that?

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00:55:45.510 --> 00:55:57.120

Kim Prunty: So we look at this as a beginning and it's for a variety of things, just to be very clear, it's to set up the facility, which has been completed, and now it is open. It is to provide training for

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00:55:58.080 --> 00:56:04.560

Kim Prunty: those who want the training, everything from basic business training to helping businesses that have been established for a while.

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00:56:05.070 --> 00:56:10.770

Kim Prunty: It is providing grants so that money is distributed among all these different activities.

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00:56:11.370 --> 00:56:16.830

Kim Prunty: Working with the Small Business Development Centre and working with the Eleuthera Chamber there hasn't been something like this,

331 00:56:17.100 > 00:56:22.230

Kim Prunty: in this exact form on the island, so we wanted to first understand what is the realm of

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00:56:22.620 --> 00:56:31.530

Kim Prunty: individuals who need assistance, what types of assistance, do they most need, and so this is the beginning of the relationship. We're still several years out.

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00:56:31.860 --> 00:56:33.570

Kim Prunty: Three years out from the project.

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00:56:33.930 --> 00:56:45.480

Kim Prunty: And what can we do now to get people ready? So, I would consider this an initial investment. I also would say that you know, there are many needs in Eleuthera and talking to the residents and citizens there

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00:56:45.750 --> 00:56:51.840

Kim Prunty: and there are a variety of other programs that will be getting involved in. We spoke about the Ministry of Education, we talked about

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00:56:52.110 --> 00:57:03.180

Kim Prunty: The workforce development programs. And so I would say there will be numerous other parts and pieces in terms of our investment in the community and we're very much in the process of evaluating that.

337

00:57:04.770 --> 00:57:09.420

Director Newbold: Thank you, Dr Bently Higgs, can I ask you to unmute your MIC.

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00:57:13.470 --> 00:57:14.460

Dr. Bently Higgs: Hi good afternoon.

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00:57:15.600 --> 00:57:17.160

Dr. Bently Higgs: Pleasure, being a part of this meeting.

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00:57:18.390 --> 00:57:22.710

Dr. Bently Higgs: I'm a PhD in sustainable solid waste management.

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00:57:24.000 --> 00:57:31.050

Dr. Bently Higgs: And, basically, I was listening to the presentation and it was mentioned that consideration will be

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00:57:32.550 --> 00:57:56.790

Dr. Bently Higgs: provided for solid waste management. Is this waste management plan done from, is it a comprehensive waste management plan that you have developed for, for I guess the southern portion of Eleuthera to encompass the Lighthouse Point um traffic that will generate waste.

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00:57:58.500 --> 00:58:02.220

Dr. Bently Higgs: Yeah so yeah do you do you have a full plan?

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00:58:04.680 > 00:58:12.060

Kim Prunty: So, most of this will be covered in the environmental management plan, but I can certainly share with you kind of philosophically and if anybody else

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00:58:12.570 --> 00:58:21.810

Kim Prunty: from our team wants to jump in. So, our goal is to achieve zero waste to landfill for this project. We seek to do that in a variety of ways. First is reducing

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00:58:22.260 --> 00:58:32.100

Kim Prunty: the waste created in the first place. So a perfect example of that is our plastics program across Disney and at Disney Cruise Line we've eliminated plastic straws, we've eliminated

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00:58:32.970 --> 00:58:39.030

Kim Prunty: you know, individual amenity bottles in staterooms we have essentially

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00:58:39.780 --> 00:58:48.690

Kim Prunty: eliminated, you know tons and tons of plastic waste over the past few years and that's one example. But we look to reduce in any way that we can.

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00:58:49.050 --> 00:58:56.340

Kim Prunty: Recycling is another really important part of the process, so items that can be recycled will be returned to the ship.

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00:58:56.970 --> 00:59:11.490

Kim Prunty: We recycle a significant amount of material, as it exists today. The other really great opportunity in Eleuthera is about reusing. So we already order and supply ourselves to reduce waste as much as possible.

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00:59:12.180 --> 00:59:24.120

Kim Prunty: However, we look forward to the opportunity to share additional construction materials operational materials, etc, working with an organization in Eleuthera to provide that free of charge to

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00:59:25.050 --> 00:59:35.460

Kim Prunty: individuals in the community. For waste that doesn't fit into those buckets we are still looking at the latest technology, looking at

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00:59:36.210 --> 00:59:42.870

Kim Prunty: The type of incineration that could have the least environmental impact and exploring things like waste to energy opportunities.

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00:59:43.230 --> 00:59:58.380

Kim Prunty: So our Environmental Management Plan will address this. We are also hopeful that technology will catch up and we're willing to invest in that technology to provide those opportunities. And Dave I don't know if you have anything further to add.

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00:59:59.820 --> 01:00:11.220

David Chiaradonna: Nope. I agree. I mean I think through incineration how that technology emerges, you know we can look at those sustainable practices, things like very low burning incineration to where you do have

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01:00:11.730 > 01:00:25.830

David Chiaradonna: a low carbon footprint output and then you can convert a lot of that energy back to you know usable things on site that would be in the confines of our back of house utility, so you captured it.

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01:00:26.550 --> 01:00:31.350

Kim Prunty: Yeah but getting to reduce, recycle, reuse taking us through those steps first.

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01:00:32.490 --> 01:00:45.030

Director Newbold: All right, for us, ladies and gentlemen, let me just for the record, indicate there are 317 persons presently on the call and the chat has just blown up with over 100 comments opinions and some questions.

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01:00:46.260 --> 01:00:51.180

Director Newbold: That being said, can I ask Kelly Arkles to unmute your MIC and take the floor.

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01:00:53.970 --> 01:00:54.960

Kelly Arkles: Hi everyone can you hear me?

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01:00:55.830 --> 01:00:56.550

Director Newbold: We can hear you.

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01:00:56.820 --> 01:01:04.140

Kelly Arkles: Hi, wonderful so my question comes down to the access that Disney's EIA states for

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01:01:04.800 --> 01:01:15.120

Kelly Arkles: The southernmost tip, in particular, and my question is it's allowed for Bahamian residents and citizens for non-commercial purposes, what does that allow, that's my first question.

364

01:01:15.450 --> 01:01:28.620

Kelly Arkles: My second question is, is it only going to be when cruise ship is not in port? And then what about access for stay over tourists, which I'm speaking on behalf of who have already fallen in love with Lighthouse Point, is our access now prohibited?

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01:01:33.660 --> 01:01:40.320

Kim Prunty: So full access for citizens and residents of The Bahamas means full access for citizens and residents of The Bahamas.

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01:01:40.770 --> 01:01:52.530

Kim Prunty: And we will be working with our own security team and local law enforcement and taking the direction of local law enforcement if they would ask that we put any parameters as an example around it.

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01:01:53.400 --> 01:02:00.990

Kim Prunty: But they will be able to visit when the ship is in port or when it's not in port, so and so that's the piece,

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01:02:01.380 --> 01:02:08.730

Kim Prunty: the first question, I believe. I think that you know that there will be periods of time during construction where for safety reasons.

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01:02:09.570 --> 01:02:19.680

Kim Prunty: full access may not be available, just to be fully transparent, and we'll be working with Government and law enforcement and our own safety team to understand what that looks like.

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01:02:20.490 --> 01:02:29.250

Kim Prunty: But you know we will do our best to navigate around that and once it when it's operational, it is open to citizens and residents. And

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01:02:29.850 --> 01:02:47.610

Kim Prunty: In terms of other visitors there's a fairly substantial portion of the beach that is being donated, 25% of the area, um as noted earlier in the presentation and so for someone who's not a resident, that area will be available.

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01:02:48.090 --> 01:02:49.980

Kelly Arkles: But not the southernmost tip, correct?

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01:02:51.480 --> 01:02:54.780

Kim Prunty: The southernmost tip would be for citizens and residents of the Bahamas.

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01:02:54.900 --> 01:03:11.130

Kelly Arkles: OK well, the only thing that I wanted to say my last time it would be to any of the Bahamian government that your stay over tourists, which you have noted bring in more than cruise tourists, you are slighting us by this, many people have fallen in love with this site, thank you.

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01:03:14.130 --> 01:03:18.270

Director Newbold: Oh next we have Sam, Sam can you unmute your MIC, please.

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01:03:22.260 --> 01:03:22.590

Sam?s: Hi.

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01:03:24.240 --> 01:03:24.780

Sam?s: Good evening, everyone.

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01:03:25.920 --> 01:03:26.790 Sam?s:

Sorry about the.

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01:03:28.200 --> 01:03:28.830

feedback.

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01:03:30.360 --> 01:03:40.980

Sam?s: What I what I'm trying to understand is, I do not see anything in your EIA that speaks to a million people coming to that site every year.

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01:03:41.460 --> 01:03:58.950

Sam?s: And the impact of those people, excuse me peeing in the water, suntan lotion everywhere, which we know is not good for the for corals like, how do you all intend to deal with that? And you know, removing,

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01:04:00.450 --> 01:04:10.080

Sam?s: or shall I say dumping another grade of sand on top of what is already an exquisite beach.

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01:04:10.890 --> 01:04:19.080

Sam?s: How, how do you all like come to a beautiful place and then decide it's not as beautiful as it really needs to be,

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01:04:19.500 --> 01:04:27.390

Sam?s: and we're going to make it really much more beautiful but it does not make sense to me. I don't understand how,

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01:04:27.900 --> 01:04:47.910

Sam?s: number one, well not number one there's so many, but how do you build a cruise port in the middle of a proposed Marine Protected Area and think that that's a good idea? Would you be happy if we came to your country and built in Yosemite?

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01:04:49.020 --> 01:04:50.490

Sam?s: I mean, because essentially that is

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01:04:50.490 --> 01:04:51.810

Sam?s: What you're doing to us.

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01:04:52.410 --> 01:04:58.350

Director Newbold: Ms. Duncombe, thank you so much, give them an opportunity to respond to the question about the volume of visitors, thank you.

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01:05:01.470 --> 01:05:10.860

Kim Prunty: So I would say a couple of things. First, is that only one ship is able to be hosted in port, at a time.

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01:05:11.670 --> 01:05:23.820

Kim Prunty: Our ships range in passenger volume from 2800 passengers to up to 3800 passengers and we deal with this today with Castaway Cay, which is also less than 20% developed.

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01:05:24.330 --> 01:05:31.770

Kim Prunty: The natural environment exists for the overwhelming majority of the property. We have more than 20 years of experience of

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01:05:32.100 --> 01:05:41.520

Kim Prunty: keeping our guests in areas where they are welcome and not allowing them to areas that they are not, and so we will use that experience.

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01:05:42.030 --> 01:05:50.850

Kim Prunty: as this site becomes operational. We also intend to have a pretty significant educational program

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01:05:51.180 --> 01:06:01.200

Kim Prunty: associated with this project, which includes things like not using sunscreen that is not coral friendly. It includes a variety of things, not going into areas that

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01:06:02.010 --> 01:06:04.950

Kim Prunty: you know you're not welcome into because of the environmental protection.

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01:06:05.280 --> 01:06:13.170

Kim Prunty: You know, we survey our guests and what we hear from them is they want to go to real places, they also want to be involved in helping to protect the environment.

397

01:06:13.500 --> 01:06:29.820

Kim Prunty: We have a whole theme park at Disney's Animal Kingdom, which focuses on educating our guests, and so we feel comfortable that based on our experience at Castaway and based on our experience in places all over the world, that we can help protect this this place.

398

01:06:31.440 --> 01:06:36.090

Director Newbold: Thank you now you have Sarah Corbett, Sara please unmute your MIC.

399

01:06:40.110 --> 01:06:45.840

sarah corbett: Yeah and just to be clear, this is Jeremy hanging out here with Sarah, uh thanks for your time I do respect it.

400

01:06:48.330 --> 01:06:56.250

sarah corbett: One thing everyone seems to agree on is that Lighthouse Point is rich, it's just about like who thinks that they own that wealth.

401

01:06:57.270 --> 01:07:04.620

sarah corbett: You guys, have you guys have admitted pretty clearly just now that you have no idea what you do about the waste. Your answer was basically,

402

01:07:05.100 --> 01:07:14.730

sarah corbett: well, some technology will be invented by the time that we need to deal with that, but the reality is you have no idea of the impact of this is going to have.

403

01:07:16.050 --> 01:07:25.110

sarah corbett: But you really use the word you really emphasize the word environmentally responsible, and I think everyone agrees, like yeah we want you to be environmentally responsible.

404

01:07:25.980 --> 01:07:36.690

sarah corbett: But we all apparently disagree on what environmentally responsible is so I would like to really hear directly from you guys because he really danced around this specifically.

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01:07:40.800 --> 01:07:50.700

sarah corbett: Why do you think that your very narrow version of environmentally responsible is the one that everybody else should go along with?

406

01:07:53.550 --> 01:07:56.610

Director Newbold: Thank you Corbett give them an opportunity to answer.

407

01:07:58.560 --> 01:08:06.030

Kim Prunty: So what I would share is that what we were asked to do is to complete an Environmental Impact Assessment.

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01:08:06.600 --> 01:08:14.670

Kim Prunty: We fully believe that everyone has a right to their own opinion, our Environmental Impact Assessment was based on three years of collecting facts

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01:08:15.150 --> 01:08:29.640

Kim Prunty: and putting together data and analyzing data, so what we presented is not opinion, um, there's numerous, there are numerous facts throughout the document. And I would like to also clarify,

410

01:08:35.430 --> 01:08:51.420

Kim Prunty: I would also like to clarify that it's not that we don't have a plan for waste, it's that is covered largely in the Environmental Management Plan, which is the phase we go into after that and we shared our philosophy and the details will be available in the plan.

411

01:08:55.050 --> 01:08:59.070

Director Newbold: Thank you, can we get Andy Mims, please unmute your MIC.

412

01:09:03.210 --> 01:09:05.850

Andy Mims: Hi there, thank you for taking my

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01:09:06.930 --> 01:09:13.950

Andy Mims: question. I'm a shareholder of the company, I appreciate the fact that you're going through this and that you're um,

414

01:09:16.320 --> 01:09:23.400

Andy Mims: trying to be transparent here I did hear some questions by a woman earlier, Casuarina McKinney,

415

01:09:24.840 --> 01:09:33.270

Andy Mims: and I'm trying to learn more about this project myself. I was frustrated that she was cut off.

416

01:09:34.320 --> 01:09:52.950

Andy Mims: particularly given your commitment to transparency, and I would hope that she could have the MIC again and finish your questions, and I would encourage Disney to take her call if she or her hand if she raises it again, because I would like to hear the rest of her question.

417

01:09:53.010 --> 01:09:53.280

Director Newbold: Thank you, Mr. Mims.

418

01:09:55.410 --> 01:10:02.490

Director Newbold: And for clarity to all Disney is not controlling the accessibility of anybody involved in the discussion or the Q&A today.

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01:10:03.060 --> 01:10:09.900

Director Newbold: I just want to make that very clear, as I said in the very beginning, the whole matter is being controlled by the Department of Environmental Planning & Protection.

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01:10:10.320 --> 01:10:22.080

Director Newbold: We also want everybody to be clear and understanding and there's 21 days opportunity thereafter to have any concerns that they may have addressed by putting it in writing, it will be responded to.

421

01:10:22.530 --> 01:10:36.810

Director Newbold: That being said, we've held, Dr Davis for a while trying to allow those who have not yet made initial comments to have that opportunity, but I think I will ask him now to unmute his MIC and take the floor and then we will proceed with the others.

422

01:10:41.490 --> 01:10:42.540

Dr. Leno Davis @SciPerspective: Thank you again,

423

01:10:43.620 --> 01:10:44.550

Dr. Leno Davis @SciPerspective: Director Newbold.

424

01:10:45.960 --> 01:11:02.730

Dr. Leno Davis @SciPerspective: This is addressed, I guess, probably Miss Prunty will be able to help on this, the tour... the cruise tourism industry has really been pushing for Bahamian and Caribbean shore excursion

425

01:11:04.290 --> 01:11:18.000

Dr. Leno Davis @SciPerspective: program offerings to meet the requirements of the global certificate and sustainable tourism. Now, you say that access to the site is only for non-commercial purposes.

426

01:11:18.840 --> 01:11:33.780

Dr. Leno Davis @SciPerspective: I would like to know if you will be allowing bird guides or environmental guides from the Bahamas access to the site and not just to your guests, but to bring in their own guests as well.

427

01:11:34.650 --> 01:11:47.370

Dr. Leno Davis @SciPerspective: Because it's not sustainable, for them to only be able to work when you are in country and based on the guidelines of the global certificate and sustainable tourism,

428

01:11:47.880 --> 01:12:05.130

Dr. Leno Davis @SciPerspective: if you do not allow that that would actually be a negative impact both socially, economically and environmentally. And if you're not doing that are you bringing in your own employees who then would not be as experienced in our environment.

429

01:12:06.960 --> 01:12:08.310

Director Newbold: Thank you, Dr Davis.

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01:12:09.180 --> 01:12:22.500

Kim Prunty: That's a great question um, and you know, we have already through the EIA through our monitoring programs are including Bahamians and we intend to do that, throughout the operation of

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01:12:23.430 --> 01:12:30.000

Kim Prunty: of the of the site, so what I would tell you is know if we brought in employees, they would be Bahamians.

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01:12:30.450 --> 01:12:41.790

Kim Prunty: And we do think that there are a lot of great environmental stories to tell, and I think there's a lot of work to do, and we have a couple of years to do that, to understand exactly what that looks like.

433

01:12:42.150 --> 01:12:54.750

Kim Prunty: And maybe Claire would like to also add. She leads our conservation programs but collaborating, especially in country, um, is a big priority of ours. Claire, do you want to talk a little bit about that?

434

01:12:55.770 --> 01:13:02.190

Claire Martin (she/her): Yes, sure, at Disney as part of our enterprise social responsibility strategy we are looking at

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01:13:02.520 --> 01:13:15.030

Claire Martin (she/her): how we really think about providing inspiration, opportunity and access from early childhood, all the way to early career for local communities where we work, and we know we're in this example would be the exact same.

436

01:13:15.570 --> 01:13:23.790

Claire Martin (she/her): We're looking at you know paid positions focused on conservation and science. We're also focused on you know more comprehensively how we can support

437

01:13:24.390 --> 01:13:30.270

Claire Martin (she/her): education and opportunity for Bahamians to be you know to be the next generation of conservation leaders.

438

01:13:30.660 --> 01:13:41.310

Claire Martin (she/her): And we want to work with local partners to determine the best way to do that and to think about how we best invest philanthropically, but also where we can pull together expertise to support as well.

439

01:13:44.430 --> 01:14:03.840

Director Newbold: Thank you, we, it is now 7:17pm, there are three more minutes left in this activity. There are 309 persons, still on the call and the chat group has well over 200 comments. That being said, I will ask Miss Thompson and Miss Thompson to take the floor, please.

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01:14:10.290 --> 01:14:11.430

Director Newbold: Thompson are you there?

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01:14:13.950 --> 01:14:17.700

Director Newbold: Interest of time, Kishon Turner please take the floor, please.

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01:14:18.870 --> 01:14:19.920

Kishon Turner: Yes, good night.

443

01:14:22.350 --> 01:14:27.780

Kishon Turner: Based on your low density development and sustainable practices.

444

01:14:29.760 --> 01:14:35.340

Kishon Turner: What is your yearly projected carbon footprint, if you are only using 30% renewable energy?

445

01:14:40.650 --> 01:14:45.570

Kim Prunty: So this information is in the EIA. I'm trying to find it right now, and let me,

446

01:14:45.630 --> 01:14:54.240

Kim Prunty: let me be clear, this is another one of the situations that we, we are still working through. We committed to at least 30%.

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01:14:54.630 --> 01:15:10.080

Kim Prunty: We anticipate that that will be growing to more than 30%, as I mentioned at Castaway Cay we're in the middle of an installation that will bring us to 70% solar, so it is really just the starting point that we committed to as part of our EIA.

448

01:15:10.830 --> 01:15:16.860

Kim Prunty: We have calculated it I don't know if anybody else from our team has it in front of them.

449

01:15:17.400 --> 01:15:24.990

Dr. Mark Penning: Kim it's worth just making clear, if I can jump in there, that we could look at a greater percentage of solar but we've

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01:15:25.350 --> 01:15:37.740

Dr. Mark Penning: really got to weigh that up against cutting out coppice vegetation that probably you know does a better job than even the panels do you know. We want to leave forest intact, so that

451

01:15:38.250 --> 01:15:50.220

Dr. Mark Penning: also factors into the 30% equation. It's not that we didn't want to go higher than 30%. I hope that makes sense and Kim if I'm not mistaken, that number was 3100.

452

01:15:52.110 --> 01:15:52.980

Director Newbold: Thank you.

453

01:15:53.190 --> 01:15:56.910

Dr. Mark Penning: And we're on, it's 25% less than what we're doing at Castaway.

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01:15:58.500 --> 01:16:01.290

Kim Prunty: And that number is also reducing due to the installation.

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01:16:02.070 --> 01:16:11.610

Director Newbold: Ladies, gentlemen, we are at the 7:20pm mark, I will allow one more question that would be from Miss Rashema Ingraham. Please take the floor and ask your question.

456

01:16:15.030 --> 01:16:19.590

Rashema Ingraham: Thank you, thank you and I'm so happy that I have the opportunity to speak.

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01:16:20.280 --> 01:16:31.800

Rashema Ingraham: Just going back to the question that was asked first, I believe, about the construction and whether or not Bahamians were also going to be used for the construction. I wanted to know if

458

01:16:32.610 --> 01:16:46.380

Rashema Ingraham: the LEED certification, which is a gold standard, was going to be adopted in this project, and how it's going to be adopted? And looking at those Bahamian contractors, how was training going to be to make sure that they are up to those standards?

459

01:16:48.960 --> 01:16:57.060

David Chiaradonna: Yeah so I can answer the question on the LEED certification and we'll talk the training. So LEED certification, as far as the buildings are concerned, right now, that we're constructing

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01:16:57.570 --> 01:17:02.580

David Chiaradonna: for guests, they are very much open air buildings very limited windows,

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01:17:03.150 --> 01:17:11.820

David Chiaradonna: very limited lighting, roofing structures. So all in all, to get a LEED certification on the buildings that we're constructing, it will be challenging.

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01:17:12.090 --> 01:17:22.320

David Chiaradonna: We are going to look at that. Now, I can say from the back of house locations where we will have warehouses, where we will house cast, those are buildings that will definitely be considered.

463

01:17:23.700 --> 01:17:33.990

David Chiaradonna: As far as training is concerned, um, again with this project being a design build, we have a robust set of deliverables that we are asking our design build teams to come back with.

464

01:17:34.440 --> 01:17:52.080

David Chiaradonna: Training, first and foremost, is number one alongside of safety. We will not do anything unless we train, um you know our talent, to be able to move forward with activities on a daily basis, and that goes for our Bahamians as well, which is all incorporated

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01:17:52.650 --> 01:17:53.730

David Chiaradonna: into what we've committed

466

01:17:53.730 --> 01:17:55.890

David Chiaradonna: to do as part of the Heads of Agreement.

467

01:17:56.790 --> 01:18:09.030

Kim Prunty: And what I would also add, is, we have worked closely with the Bahamian Contractors Association throughout this process and are an active conversations with them about what kind of training is needed, and how we can assist with that.

468

01:18:14.160 --> 01:18:28.980

Director Newbold: All right, ladies and gentlemen, I thank you all for your participation in this meeting today, I know that there are a lot of questions, I know there are a lot of opinions that people would like to express, but we would be here all night and

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01:18:30.180 --> 01:18:40.710

Director Newbold: the opportunity that is required is for you to be able to make your presentations or make your queries known, and I think, for the most part, those who wanted to verbalize those

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01:18:41.100 --> 01:18:56.430

Director Newbold: had the opportunity. And as I said in the chat, we have well over 300 statements, opinions and some questions that are posted there and those that are in writing, are being captured by the system, as well as the recording of the meeting.

471

01:18:58.440 --> 01:19:12.480

Director Newbold: What will, the next steps which will happen is that the Disney will have the opportunity to address all comments, questions and concerns. And when I say comments let me be clear, I don't mean,

472

01:19:12.960 --> 01:19:23.070

Director Newbold: I don't think Disney should be here and then Disney to say something. Your comments and opinions are accepted as is. What Disney is responsible to is providing

473

01:19:23.700 --> 01:19:39.330

Director Newbold: responses to questions, to addressing any gaps that may be in the documentation or highlighted by members of the public. For the next 21 working days, and so I want to make a correction to the slide. I do apologize for not catching this earlier.

474

01:19:40.380 > 01:19:54.510

Director Newbold: You have until actually April, I'm sorry March...May 7, you have until Friday May 7 at 5pm Eastern Standard Time to provide your comments. Any comments received

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01:19:54.990 --> 01:20:03.150

Director Newbold: Beyond that day will not be accepted. Disney will not be able to complete its process until after that May 7 timeline.

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01:20:03.810 --> 01:20:12.840

Director Newbold: As you may send in your comments on May 6 and you want to make sure the document is thoroughly addressed and your comments or concerns, not comments, your questions

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01:20:13.290 --> 01:20:29.850

Director Newbold: or concerns or identifications of gaps are truly responded to as comprehensively as possible. Should you have any concerns about ensuring that your questions or concerns or identification of gaps are not taken into account, you are

478

01:20:30.900 --> 01:20:39.750

Director Newbold: have the option of ensuring that those are filtered into this department, or they can be filtered directly to Disney or both.

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01:20:40.500 --> 01:20:52.290

Director Newbold: In any event, by law we are required to pass along any questions or concerns that come to us to the Developer, not just Disney, in any project that's ongoing.

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01:20:52.590 > 01:21:08.250

Director Newbold: And those must be addressed. Once those are, once the public consultation report is completed, the Government will review it, it will be posted up on their website for you to ensure that your questions have been captured and are being

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01:21:09.990 --> 01:21:19.500

Director Newbold: considered and are a part of the documentation. And if there have not been any substantive concerns for the environment or any

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01:21:20.430 --> 01:21:28.500

Director Newbold: responses or questions that have been posed that have not been thoroughly addressed through the EIA process those must be addressed.

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01:21:29.100 --> 01:21:38.100

Director Newbold: We will not be able to move any further unless they are substantively addressed, if any, has been highlighted. If none has been highlighted

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01:21:38.370 --> 01:21:42.750

Director Newbold: and there is no concern about the environmental sustainability of the project,

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01:21:43.140 --> 01:21:53.550

Director Newbold: then the project will move on to the next step, which, Miss Prunty has indicated, will be the production of the Environmental Management Plan. That document will also be provided on the website

486

01:21:54.120 > 01:22:02.310

Director Newbold: and will be available for the public to review. If you have any questions or comments relative to that document when it is submitted, you are free to provide it to the Department for its,

487

01:22:03.870 --> 01:22:13.650

Director Newbold: while it's doing its review in consideration of your concerns. If throughout the entire process it is determined that there is no significant environmental concerns relative to

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01:22:13.980 --> 01:22:18.720

Director Newbold: the development being proposed by the developer, and that being in this case Disney

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01:22:18.990 --> 01:22:25.470

Director Newbold: a certificate of Environmental Clearance will be issued to the developer, which will then trigger their ability

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01:22:25.740 --> 01:22:35.580

Director Newbold: to approach the Ministry of Works and all other infrastructure related permits and agencies that issue that permit for them to then undertake the works.

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01:22:36.060 --> 01:22:42.360

Director Newbold: If anybody has any questions or concerns or needs further clarification to what I have indicated here tonight

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01:22:42.720 > 01:22:54.660

Director Newbold: please know that the Department is available and open to the public. We do accept calls, we do respond to your emails and we are very, we try and be very transparent with every process

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01:22:55.620 --> 01:23:01.770

Director Newbold: as it relates to the new environmental legislation that now requires that all information be shared with the public.

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01:23:02.280 --> 01:23:15.150

Director Newbold: We stand by that, we support that and we encourage you to hold the government's feet to the fire to ensure that that process is transpired, transcurring and it is being implemented.

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01:23:16.170 --> 01:23:24.180

Director Newbold: So, without any further ado I say thank you for Disney and its consultants for participating and being a part of the process this morning, I mean this evening.

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01:23:24.540 --> 01:23:39.120

Director Newbold: And I say thank you to members of the public, residents and visitors to The Bahamas, for also being a part of the process this evening. We look forward to a finalization, either which way, and you will be informed. Good night to all.

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01:23:40.710 --> 01:23:49.560

Director Newbold: Oh I'm so sorry Reverend Anderson, if you are on the call please raise your hand, so you can close this out in a word of prayer.

498

01:23:56.760 --> 01:23:58.530

Director Newbold: Reverend Anderson are you there.

499

01:24:03.540 --> 01:24:07.860

Director Newbold: Okay, so yet again folks I say good night, and thank you.

**5.0 ATTACHMENT B: RECORDED PUBLIC MEETING CHAT TRANSCRIPT**

15:10:20 From Meryl Salzinger to Everyone : The time to review this EIA is too short

15:10:42 From Holly to Everyone : agree

15:10:48 From Rashema Ingraham to Everyone : Thank you for enabling the chat

15:10:53 From Kishon Turner to Everyone : True. It is over 500 pages long

15:11:03 From Alison Salzinger to Everyone : What steps are being taken to protect the reefs from extra silt that will kill already stressed coral reefs?

15:11:08 From hank ferguson to Everyone : Time lines for review is outlined in law!

15:11:25 From Glocat to Everyone : Ms, Prunty says "if no one objects we'll assume it's fine" hold on you're DEPP, you look at it, not the general public. muddoes

15:11:26 From Jewel Edwards to Everyone : Good evening. Looking forward to this presentation.

15:11:37 From ArthiaNixon to Everyone : and where can people submit via email please?

15:11:50 From Glocat to Everyone : inquiries@depp.gov.bs

15:11:57 From ArthiaNixon to Everyone : thank you

15:13:12 From Sam's to Everyone : Where's the Oxford Economy report?

15:13:28 From Holly to Everyone : what is his last name?

15:13:49 From Meryl Salzinger to Everyone : Oxford Economy has been accused of being biased in the past. How do we know they are not in this instance?

15:13:51 From hank ferguson to Everyone : Mr Mark Penning

15:13:58 From MorSun Logistics to Everyone : Thats it?

15:15:29 From Liza Rizzo to Everyone : One million....? over 3 years....? Disney Market Cap is 338B

15:15:35 From Tod Hagan to Everyone : Which organizations peer reviewed and verified accuracy of the Oxford Economy Report?

15:15:47 From Chris Potter to Everyone : The "head of the Disney team is a vetivetinariannarian with experience in zoological wildlife

15:16:25 From Tod Hagan to Everyone : Must be third party review

15:16:28 From Glocat to Everyone : No Spanish Wells ran you out of town

15:16:33 From Holly to Everyone : previous failed One Eleuthera was viable. Egg Island got rid of disney

15:17:03 From Sam's to Everyone : How can Disney "give" us crown land when it's already ours?

15:17:08 From Chris Potter to Everyone : The "head of the Disney team is a veterinarian with experience in zoological wildlife...why not an ecologist with experience in coral reef ecosystems?

15:17:39 From Holly to Everyone : will it be non smoking? birds eat cigarette butts and die

15:17:42 From Meryl Salzinger to Everyone : Where is the proof that driving the piles for your pier will not have a negative impact on sea life and coral? It is not in the EIA

15:17:44 From Marjie Findlay to Everyone : Disney is ignoring the proposal by the Lighthouse Point Partners that was presented to the government as an alternative. They always refer to a development that was never presented or approved. The one being shown

15:17:48 From Glocat to Everyone : yes cause public sentiment was too strongly against

15:17:57 From Sam's to Everyone : Stop showing old projects that have no bearing on the impact Disney's project will have

15:18:19 From Holly to Everyone : marina more pollution

15:18:30 From Bianca to Everyone : What is the plan for disposing of all the trash that will be generated from all these visitors?

15:18:33 From Holly to Everyone : donated crown land

15:18:46 From Meryl Salzinger to Everyone : Only one ship the size of an apartment building is hardly really "only one ship"

15:18:53 From Glocat to Everyone : aaaaaaaahhhhhhhhhhhhhhhhhhh

15:18:54 From Rashema Ingraham to Everyone : How has / is Disney actively engaging stakeholders, including those who may have some concerns or apprehensions to the project?

15:19:07 From Sam's to Everyone : Nothing Bahamian about your architecture

15:19:14 From Marjie Findlay to Everyone : What is public access to the actual point of LHP?

15:19:16 From Chris Potter to Everyone : The EIP also reviews some impacts on coral reefs but does not acknowledge that coral reefs are already an ecosystem under extreme environmental stress due to warming climate. How would this stress be exacerbated by the current construction and public use of this area?

15:19:21 From Glocat to Everyone : looks like Atlantis

15:19:25 From Kristel Kingston-Anderson to Everyone : that looks like China, not Bahamas

15:19:32 From Jewel Edwards to Everyone : As an Eleutheran at heart, it is important for us to keep an open mind and listen to the facts. We can synergistically determine the way forward for Eleuthera. We need to think what is best for my beloved Eleutherans and island.

15:19:36 From Mike's S21 Ultra to Everyone : I don't understand how donated land can be later looked at as future expansion

15:19:41 From Holly to Everyone : ruin environment with plastic

15:19:49 From ArthiaNixon to Everyone : you all overlooked ELEUTHERA artists already

15:20:27 From Sam's to Everyone : If your project is so amazing why haven't you used LEED design?

15:20:31 From Holly to Everyone : crowded beach usually 10-15

15:20:33 From Meryl Salzinger to Everyone : Are you guaranteeing these jobs for eleutherans? i

15:20:40 From Tamika Galanis to Everyone : There's no access to the southernmost point once you've developed. Point is moot.

15:20:55 From ArthiaNixon to Everyone : and how many in senior roles please? you are saying Bahamian not Eleutheran

15:20:56 From Holly to Everyone : who determines high quality

15:20:59 From Toby Smith to Everyone : Since Disney already has Castaway Cay: why don't they just keep to that.

Why is Disney only just hiring a Bahamian manager of Castaway Cay last month when they have been here for 20 years.

Why is the "BEST" Commission giving Disney the opportunity to pitch their project and host this call, why aren't they balancing the debate by allowing Bahamian environmental groups to pitch their concerns for the same amount of time. Can the BEST Commission see why Bahamians see such behavior they favour Disney's project and this is a done deal.

Just because Rickey Mackey wants it as his agenda, he does not speak for all Bahamians.

15:21:27 From Barbara Dickison to Everyone : Not buying any of it.. they use all their own employees. Always have always will— there is no guarantee for any of these and no way to ever hold their feet to the fire for anything they say..

15:21:29 From Sam's to Everyone : Disney's draft EIA does not address 1million people a year on this pristine site

15:21:41 From Meryl Salzinger to Everyone : Can you see from this chat that there are a lot of people who are not OK with this EIA?

15:21:42 From StopDisney1970 to Everyone : Cutting off the actual lighthouse point to public access is REMOVING a MAJOR ATTRACTION on Eleuthera! This is like a shopping mall loosing an anchor store.

15:21:44 From Holly to Everyone : full access when the cruise shippers are not there

15:22:05 From casuarinamckinney to Everyone : The EIA does not adequately consider alternative plans — a requirement in the 2020 EIA Regulations, and standard practice for EIAs worldwide. The EIA mentions briefly that other sites were considered, but does not consider alternative developments at Lighthouse Point.

The only alternative Disney mentions is a much denser condo and marina project which was proposed and failed in 2009. Disney does not mention, let alone consider, the land-based low impact sustainable alternatives.

15:22:06 From Mike's S21 Ultra to Everyone : the amount of fishing needed to feed everyone visiting by boat daily will be stressful

15:22:18 From Rashema Ingraham to Everyone : Culture is a part of the Bahamian "environment" so other than saying the word "culture" what are some of the key cultural elements that Disney has included in its EIA to preserve them and to use the local and national Bahamian talents - helping to develop their careers, giving proper royalty rates and compensation for work produced?

15:22:21 From Rebekkah to Everyone : Bahamian or Eleutherans?

15:22:32 From Stacie's iPhone 11 Pro Max to Everyone : If it were in the US, they wouldn't allow this even if it had an endangered species of weeds; let alone endangered coral and sea life.

15:22:50 From Meryl Salzinger to Everyone : Why would Disney ask Bahamians to agree to what amounts to the desecration of one of if not the most beautiful and pristine places on Eleuethera? It is the equivalent of asking the US to allow the a bridge to be built in the grand canyon. I wonder if race has something to do with it. Does Disney think that because there are black and brown people in Eleuthera their national treasures are less important?

15:23:16 From Glocat to Everyone : thank you Meryl, great point

15:23:17 From Sam's to Everyone : Hey Disney is it true that one of your ships will make 830 million dollars a year... and the Bahamas is getting 805 million over 25 years

15:23:30 From Holly to Everyone : never met with anti people

15:23:54 From . to Everyone : .

15:23:56 From Rashema Ingraham to Everyone : anti people may not be "respected" - maybe?

15:24:13 From Sam's to Everyone : Disney has refused to meet with the Stop Disney partners. 4 groups that have been involved in environmental protection for decades

15:24:22 From Holly to Everyone : and based on economics Bahamas wont get that much money

15:24:35 From Chris Potter to Everyone : How will you be monitoring the effect of the drastic increase in public use of these habitats as well as public damage to inshore reefs due to "snorkeling" and other activities.

15:24:41 From Glocat to Everyone : thanks Kim. I know you dislike your job

15:24:41 From Doonie Brewer to Everyone : I echo a previous question - why is there even a NEED for another stopover site for Disney ships? Why isn't Castaway Cay enough? Also, the artistic renderings include (what looks like) a river. What sort of blasting and/or excavation will that project necessitate? And to what level of impact on the wetlands/salt ponds back there?

15:24:50 From Alison Salzinger to Everyone : For what it's worth improving roads negatively impacts local wildlife because it increases car speeds.

15:24:52 From Tod Hagan to Everyone : Please, which third party organizations peer reviewed the environmental impact study and who funded them?

15:24:59 From Denny Rankine to Everyone : Don't what the hell Disney does, good or bad ,we will continue to have the same people object .

15:25:19 From Sam's to Everyone : What about the impact to surrounding reefs?

15:25:27 From Danielle C. Gibson to Everyone : where can one find the completed document?

15:25:31 From michael stevenson to Everyone : What about the carbon foot print?

15:25:33 From Kerwin to Everyone : no patch reefs? hmm maybe I missed something

15:25:36 From casuarinamckinney to Everyone : There are endangered species of coral in the impact zone.

15:25:38 From Jens iphone to Everyone : There is nothing environmentally responsible about this proposal.

15:25:48 From Scott Tiegs to Everyone : [https://lighthousepointbahamas.com/wp-content/uploads/2021/03/Lighthouse-Point-EIA-030921-reduced\\_v1.pdf](https://lighthousepointbahamas.com/wp-content/uploads/2021/03/Lighthouse-Point-EIA-030921-reduced_v1.pdf)

15:26:13 From Denny Rankine to Everyone : Obviously they have no real interest in what is best for Eleuthera, or the people of Eleuthera.

15:26:16 From Chris Potter to Everyone : The entire area is surrounded by coral reefs...are you honestly insinuating that the waters of your development and use area directly associated with the reefs in the area...

15:26:18 From Jewel Edwards to Everyone : @ Denny Rankine! Exactly!

15:26:23 From Samuel Kane to Everyone : This is absurd

15:26:25 From Sam's to Everyone : What about the cumulative impact of 3 cruise ports within 20 miles of one another? EIA doesn't mention that in their draft EIA

15:26:33 From ArthiaNixon to Everyone : agree Denny

15:26:36 From Danielle C. Gibson to Everyone : Thank you!

15:26:48 From Jacob Scherr to Everyone : Sounds like Disney recognizes that there are gaps in their studies.

15:27:11 From Heather Stanford to Everyone : is Dr Mark a marine biologist?

15:27:16 From Glocat to Everyone : a whole 75 feet. Wow!!!

15:27:18 From Chris Potter to Everyone : 5 acres attached to hundred of acres of patch reef and inshore habitats

15:27:20 From Samuel Kane to Everyone : "mitigate" lol

15:27:22 From michael stevenson to Everyone : The EIA should include an assessment relating to Disney's contribution to global warming through this project.

15:27:23 From Rashema Ingraham to Everyone : Can Penning refer to a map that pins the zone he's talking about?

15:27:32 From Chris Potter to Everyone : this is a joke

15:27:33 From Annie Muggia to Everyone : Do you seriously think that the surrounding reefs will not be affected? I am confused by the "science" behind this...

15:27:33 From Sam's to Everyone : What about the impact of 1 million people with suntan lotion which is a know killer of reefs?

15:27:37 From Sam Brown to Everyone : <https://www.linkedin.com/in/mark-penning-a3b6961a7/>

15:27:53 From Sam's to Everyone : What about the impacts of sewage treatment plant?

15:28:03 From Alanna alannawaldman@gmail.com to Everyone : How will sewage and sewage treatment be handled? Nutrient run off can have severe impact on nearshore environments

15:28:03 From Tod Hagan to Everyone : 24 scientists oppose Disney's proposal at Lighthouse Point: <https://waterkeeper.org/news/24-scientists-experts-oppose-disneys-proposed-cruise-ship-port-at-lighthouse-point-on-eleuthera-the-bahamas/>

15:28:05 From Chris Potter to Everyone : ocean currents don't respect "acre measurements"

15:28:19 From Chris Potter to Everyone : add my name to those 24...

15:28:39 From Kristel Kingston-Anderson to Everyone : There are coral reefs just 20 feet from the shore on the ocean side, how will you keep little Johnny from standing on the coral, dripping sun block, and saying Look at me mommy! Take a picture? Or are you just hoping to plant statues of mickey and Minnie on the reef once it's dead so the guests have something to look at like your other locations?

15:28:51 From Tod Hagan to Everyone : "Lighthouse Point is a unique natural site containing valuable marine habitats, rich biodiversity, and endangered coral species," the letter states. "There is no doubt that the construction and operation of the Disney port project would cause irrevocable, long-term environmental, cultural, and economic harm to South Eleuthera and The Bahamas."

15:28:54 From Meryl Salzinger to Everyone : what brings people to Eleuthera is its natural and almost untouched beauty and the wonderful and unique people who live here and value the beauty of their land and share it with visitors in such a beautiful way. This project will destroy this, pure and simple. And the economic benefits to those on Eleuthera can not be guaranteed and given Disney's record on this it is hard to believe that they will exist at all.

15:28:56 From Mike's S21 Ultra to Everyone : prop swath for cruise ships covers more than 60ft.

15:29:18 From Kelly Arkles to Everyone : With the number of cruise guests, how successful do you feel just "signage" will be to avoiding cruise patron carbon footprints in regards to sunscreen, trash and "other environmental conservation messages"? What enforcement of these measures is Disney prepared to take?

15:29:24 From Glocat to Everyone : it will be a dead zone Mr. Penning

15:29:32 From Dinah2 to Everyone : Why doesn't the EIA include the alternatives Disney identified + other alternative that were identified and submitted for consideration? Alternatives are the heart of EIA. This document isn't truly an EIA document.

15:29:47 From Alison Wellford to Everyone : This is greenwashing

15:29:53 From ArthiaNixon to Everyone : what do you mean manage turtle nesting AND a resort? Are you seriously thinking marine life is safe from tourist selfies if they survive?

15:29:59 From Meryl Salzinger to Everyone : good point Dinah2

15:30:00 From Sam's to Everyone : Oh they put the sewage treatment plant. next to the "public space" #environmentaljustice

15:30:03 From Barbara Dickison to Everyone : add my name to opposition don't care about a new road- I can't stand the idea of their " buying "off south Eleuthera with devices? Did that really happen? For school kids? Because I would rather do a fundraiser than take anything from this crowd

15:30:06 From michael stevenson to Everyone : What about the global externalities factor. Make Disney think global impact as well as local impact.

15:30:15 From Robin Carson to Everyone : Hmm, Dr. Penning was once the head of the World Association of Zoos and Aquariums. I'm not thinking he comes down on the side of healthy natural habitats.

15:30:17 From Jules Holland to Everyone : What are you doing to help recognize/mitigate the bias that Disney developers have on this project? Obviously there are financial incentives that Disney has and they are overriding any ethical problems they encounter.

15:30:20 From Holly to Everyone : I am sure the bonefish expert was Denny

15:30:20 From Dinah2 to Everyone : The EIA must be completed before decision making, not before construction.

15:30:33 From Sam's to Everyone : Greenwashing, bluewashing

15:30:41 From Tod Hagan to Everyone : "The area identified for the proposed cruise terminal includes sensitive coral reef habitats and has significant cultural value. These will be lost through development. If the terminal has to go ahead it should be targeted towards somewhere less sensitive and important." Peter Mumby, The University of Queensland

15:30:49 From Alison Salzinger to Everyone : So why show palm trees in your model? They are non-native

15:30:50 From Sam's to Everyone : The draft EIA is incomplete.

15:30:54 From Rashema Ingraham to Everyone : will Disney need a research permit for the sea turtle work?

15:31:34 From Sam's to Everyone : Disney had 3 years to produce this EIA and it's STILL INCOMPLETE!

15:31:34 From Kelly Arkles to Everyone : Lighthouse Point has been a formally proposed marine protected area. It is also very feasible that it would meet criteria for being a UNESCO World Heritage site. Why would Disney choose to disrupt and alter this magnificent area for the sake of a cruise ship port when there are other areas that could used and rehabilitated? Why wouldn't Disney want it protected and accessible to all? Why was this not protected as part of the Caribbean Challenge Initiative

which the Bahamian government committed to and did not achieve its committed 20% of marine protected land by 2020?

15:31:35 From Meryl Salzinger to Everyone : Why won't Disney consider making this a beautiful natural park that would attract the kind of tourism that Eleuthera is already know for? And that would lead tourists through the neighboring towns to local businesses? It would also support Disney's claim that they are an environmental cruise company.

15:31:57 From ah to Everyone : Agree Meryl - thank you for that comment

15:32:01 From Alison Salzinger to Everyone : Meryl excellent idea

15:32:01 From casuarinamckinney to Everyone : The "Bridge" between Lighthouse Point and Cat Island contains critical habitat for commercially important fish species and negative impacts on fisheries from construction and operation have not been adequately addressed in the EIA. We have yet to see the Environmental Management Plan. Is this available to the public?

15:32:03 From ah to Everyone : What is the objective of this proposal? What will it bring to the area other than Disney's economic gain?

15:32:06 From Tod Hagan to Everyone : <https://www.change.org/p/the-walt-disney-company-last-chance-for-lighthouse-point-2>

15:32:10 From ah to Everyone : Cruise ships are absolutely horrible for the environment ...

15:32:14 From Meryl Salzinger to Everyone : Thank you Kelly

15:32:24 From Holly to Everyone : Once you take habitat from endangered species they are gone

15:32:25 From ah to Everyone : Disney does not represent Bahamian culture ..... Disney is a corporation not a country with a cultural heritage

15:32:25 From Tod Hagan to Everyone : over 400,000 people have signed petition opposing this project

15:32:27 From Denny Rankine to Everyone : My interest has always been what is in the best interests of the Bahamian people. That is the life i live every single day.

15:32:40 From Holly to Everyone : they are kidding

15:32:45 From ah to Everyone : If environmental preservation is such a concern for Disney, which it is clearly not, then why not create an actual nature preserve and focus the objective on that ...

15:32:51 From Matt to Everyone : The protected trees list was expanded to over 130 species last month I believe. much more added than the lignum vitae, madeira etc that was highlighted as protected. Please advise if the newly added species with be considered.

15:33:06 From Sam's to Everyone : If you haven't signed yet please go to StopDisney.com

15:33:07 From Meryl Salzinger to Everyone : Yes has Disney considered the number of people who have signed the petition against this project?

15:33:07 From Megan's iPhone to Everyone : The only way to be truly environmentally responsible is to cancel this development.

15:33:16 From Meryl Salzinger to Everyone : Yes Megan!

15:33:17 From Glocat to Everyone : Mr. Rankine and we agree Disney Cruise Line is not in the Bahamian people's best interests?

15:33:24 From Bianca to Everyone : The EIA mentions an incinerator for trash. What about the air pollution risk from that?

15:33:44 From Holly to Everyone : They will not open for questions

15:33:46 From chris maxey to Everyone : I share a letter to the CEO that helps articulate a potential alternative opportunity for Disney:

15:34:05 From Marjie Findlay to Everyone : Hope you share it

15:34:07 From ah to Everyone : Agree Megan - the only way to not impact the environment is to protect it

15:34:12 From Dinah2 to Everyone : Why isn't the full economic study available to the public?

15:34:18 From Kelly Arkles to Everyone : All of their findings for both cultural and environmental...support that Lighthouse Point meets UNESCO criteria

15:34:20 From Marjie Findlay to Everyone : R

15:34:26 From Rashema Ingraham to Everyone : where can we find the study?

15:34:38 From Holly to Everyone : GDP is not going to happen

15:34:40 From Marjie Findlay to Everyone : Why not release the economic study then?

15:34:50 From Kris Walker to Everyone : How are the structures going to be stabilized and protected? Just saying nothing will happen to them is enough.

15:34:53 From Tod Hagan to Everyone : Video of Elkhorn Coral found a few steps from Lighthouse Point:  
<https://www.facebook.com/watch/?v=481300732555556>

15:34:54 From Robin Carson to Everyone : 2024. Wow.

15:35:05 From Denny Rankine to Everyone : If you know anything about me at all, you would know that my interest is what is in the best interests of the Bahamian people. Holly who..?

15:35:22 From Jewel Edwards to Everyone : The question must remain at the forefront - what is best for my Eleuthera people?! We are hurting economically and have been for many years!! We must think broadly!

15:35:34 From Kelly Arkles to Everyone : Why haven't they engaged the environmental groups that are NOT in Disney's pockets for input?

15:35:40 From Samuel Kane to Everyone : Penning and Prunty are such snakes oh my god I hate watching them pretend to be sincere about this shit

15:35:49 From Sam Brown to Everyone : Has Disney committed those 150 jobs to Bahamians? NO

15:36:00 From Sam Brown to Everyone : They will bring their own people — this is marketing/comms

15:36:15 From Sam's to Everyone : Why didn't Disney meet with us?

15:36:33 From Kris Walker to Everyone : Two years is nothing in terms of planning for a project of this scale. It should involve years, and years of study.

15:36:36 From Chris Joyce to Everyone : so if the Bahamas is going to make 32 Mil per year for 25 years how much is disney going to make off this sacred place?

15:36:45 From Meryl Salzinger to Everyone : Yes how can Disney guarantee that the amount of jobs they are saying are going to Bahamians will actually go to them.

15:36:50 From Rebekkah to Everyone : This is going to be an environmental disaster.

15:36:58 From Demarco Mott to Everyone : STAY AWAY FROM ANDROS. PLEASE.

15:37:08 From Rashema Ingraham to Everyone : The EIA says that 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development.

15:37:14 From michael stevenson to Everyone : Shift the paradigm, Disney. Instead of a project that attempts to "limit" environmental impact, conceive of a project that takes land that needs eco-rehabilitation and restoration. Sell a eco-restoration project that improves upon an already human messed-up site.

15:37:16 From Chris Joyce to Everyone : I hope all your ships sink.

15:37:30 From Matt to Everyone : The protected trees list was expanded to over 130 species last month I believe. much more added than the lignum vitae, madeira etc that was highlighted as protected. Please advise if the newly added species will be considered.

15:38:13 From Meryl Salzinger to Everyone : yes thank you Michael Stevenson!

15:38:22 From Kelly Arkles to Everyone : The best thing for the Bahamian people is to support their entrepreneurial efforts...to teach and support...NOT let big corporation take over their land.

15:38:39 From Jewel Edwards to Everyone : This is the time for constructive dialogue; not negativity.

15:38:47 From Tod Hagan to Everyone : Are all the consultants funded by Disney?

15:38:59 From Matt to Everyone : would like to know more about pier construction and mandates that the turning basin for ships be offshore in over 80ft of water

15:39:05 From Rashema Ingraham to Everyone : The EIA says that 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development.

15:39:15 From Glocat to Everyone : that's right DEPP has a whole new list.

15:40:10 From Tyson J Demosthene to Everyone : Am 16 and looking for a job

15:40:29 From Sam's to Everyone : The Bahamas is one of the countries most at risk from climate change and sea-level rise; the Government has declared a "climate crisis". Disney's EIA provides almost no analyses or data to support its assertions that there are no climate risks associated with this development. Climate change and sea-level rise pose serious threats to the economic viability of the project.

15:40:38 From Edgar Seligman to Everyone : Why did Disney disrupt the meeting held by One Eleuthera & The Bahamas National Trust in Tarpum Bay? Why didn't Disney want Bahamians to hear about that plan? Sadly, you lost all credibility with democratically minded Bahamians when you did that.

15:40:55 From Rashema Ingraham to Everyone : LEED Certification is the gold standard for sustainable construction, but Disney's EIA does not even mention the possibility of constructing LEED-certified buildings.

15:41:09 From Edgar Seligman to Everyone : The design is rooted in Bahamian culture? Really? Looks like Polynesia, not The Bahamas...

15:41:28 From Edgar Seligman to Everyone : Bad roads bring good people. Good roads bring everyone...



15:41:46 From Edgar Seligman to Everyone : Yes, a National Park is what we need, not a cruise ship port, no matter how ecologically friendly your EIA says it is

15:41:59 From Denny Rankine to Everyone : Hey Holly, i love you to but i just may be filing for divorce since you seem to have some personal issues with me.

15:42:00 From Rebekkah to Everyone : are they locals or from other family islands?

15:42:03 From Azaleta Ishmael-Newry to Everyone : If this project goes through - What type of insurance will be needed by the Bahamian persons who want to provide tours? Eleuthera is a depressed economy. Insurance premiums in The Bahamas are usually unreachable for many small businesses. Thank you

15:42:09 From Holly to Everyone : so they will select a contractor in May so this is a done deal. Someone should ask that. Will it be an Eleutheran?

15:42:10 From Sam's to Everyone : Disney needs to submit supplemental studies as part of its EIA to address the vulnerability of the project and its long-term viability in the face of climate risks.

15:42:14 From Edgar Seligman to Everyone : Yes, a National Park is what we need, not a cruise ship port, no matter how ecologically friendly your EIA says it is

15:42:42 From Holly to Everyone : 150 job for Bahamians? Eleutherans?

15:43:02 From Denny Rankine to Everyone : I had absolutely nothing to do with any research concerning Disney...

15:43:16 From hank ferguson to Everyone : ASS!!!

15:43:19 From ArthiaNixon to Everyone : that's my question Holly. how can we guarantee Eleutherans?

15:43:24 From Danielle C. Gibson to Everyone : Andros?

15:43:33 From hank ferguson to Everyone : He is in Andros

15:43:43 From michael stevenson to Everyone : International companies can do so much better. We must force them to understand their obligations to help stop the destruction of the planet through human activity.

15:44:00 From Sam's to Everyone : As a lead communicator of Nature how do you reconcile this project that will degrade a pristine are, yes MSC took a degraded area and actually did enhance it

15:44:01 From mollydavies to Everyone : This is an absurd self justifying presentation. Disney is looking to increase the value of its stock. It is not looking to support. educate. feed, nor give opportunities Bahamians. Disney is not seeking to preserve the marine environment by bring in cruise ships.

15:44:14 From Alison Salzinger to Everyone : As a Disney shareholder I do not want to invest in a company that is developing fragile coral reefs for tourism. This will definitely increase the silt, sewage and traffic in Eleuthera will hurt the ecosystem here. This will not create enough local jobs to be worth the loss of the reason people come here - to enjoy a pristine environment. Shame

15:44:28 From Tyson J Demosthene to Everyone : lol

15:44:45 From Jewel Edwards to Everyone : @ Arthia and Holly we can all lobby that Eleutherans are given first preference providing the core competencies and skillsets needed are met and here on Eleuthera!

15:44:54 From Gregory Miller - CREST to Everyone : Dr. Gregory Miller, ExDirector of the Center for Responsible Travel (CREST) and we have just completed an independent review of the draft EIA's adequacy regarding sustainable tourism, destination stewardship, climate change, and economic benefits of the project. We find that the draft EIA is flawed, does not meet international standards for sustainable tourism and destination stewardship and is inconsistent with Disney's global sustainability brand. The draft EIA makes frequent mention of "best management practices" or BMPs that will be outlined in the ENVIRONMENTAL MANAGEMENT PLAN (EMP), but no such draft EMP is available to the public. Without an EMP, it is impossible to assess Disney Cruise Line's (DCL) proposed mitigation plans or determine if sustainable tourism, biodiversity, and cultural resources BMPs are even being considered. That said, virtually all proposed tourist activities outlined in the draft EIA represent unsustainable mass tourism options more consistent with an amusement park.

15:45:18 From Tyson J Demosthene to Everyone : who hiring in south eleuthera I need a job .

15:45:40 From Tod Hagan to Everyone : How can we have a valid impact study if the design is incomplete?

15:45:41 From Meryl Salzinger to Everyone : Thank you Gregory!

15:45:56 From Matt to Everyone : John sounded like good questions.

15:46:31 From Sam's to Everyone : Why is Disney building I. A proposed marine protected area?

15:47:12 From ah to Everyone : But regardless of exactly where a coral reef is or is not, everything you develop there is going to have an impact on the space

15:47:28 From Robin Carson to Everyone : From Shawn Neely, employee at Castaway Cay up until 2018, when, at that time Disney claimed that they had a high percentage of Bahamian employment, claimed that there were 55-60 Bahamian employees. Perhaps it's changed some, but I'm struggling to believe that it is or going to be soon 100% Bahamian. In addition, why wouldn't Disney have planned to employ Bahamians all along, why just now? Sounds as if it's damage repair.

15:47:44 From Heather Stanford to Everyone : Thank you Dr Gregory Miller

15:47:51 From Kristel Kingston-Anderson to Everyone : You just said "currents are greater" so is there not a concern with the ship's thrusters washing sand over the reefs in this area?

15:47:57 From Dinah2 to Everyone : I oversaw the implementation of environmental impact assessment in the United States for 25 years and have experience with global EIA. I agree that this draft EIA is seriously flawed. The lack of analysis of alternatives is inconsistent with all EIA standards and Bahamian law. There are serious missing gaps in information and analysis. Most of the analysis of effects is extremely superficial. This EIA needs to be seriously revised based on local and expert comment and put back out for public review and comment. Dinah Bear

15:47:59 From Meryl Salzinger to Everyone : When you drill in piles how do you think that it will not affect coral that is not in the footprint of the pier? And if you find small coral cover you should be helping to make them healthier not give them up for dead

15:48:05 From Sam Brown to Everyone : Gregory Miller please raise your hand!

15:48:10 From ah to Everyone : Right there aren't reefs because of human development

15:48:20 From Alison Salzinger to Everyone : Because reefs are already damaged is not a reason to damage them more

15:48:23 From ah to Everyone : What there is today is a result of negative human impact

15:48:35 From ah to Everyone : Right so because they do not exist then we just accept that?

15:48:41 From Glocat to Everyone : Go Casuarina!!!!!!

15:48:47 From Chris Joyce to Everyone : yeah. 10% is average because giant companies like yours comes and destroys everything public and beautiful.

15:49:08 From Tod Hagan to Everyone : The lack of analysis of alternatives is inconsistent with all EIA standards and Bahamian law.

15:49:18 From Mike Mason to Everyone : love the BREEF presence

15:49:24 From michael stevenson to Everyone : Disney, become an environmental leader. We cannot afford "business as usual". Make money by having people buy green rejuvenation projects.

15:49:29 From ah to Everyone : 10% is a horrible statistic .... Why not work to protect what is there and then helping to rehabilitate them

15:49:35 From Edgar Seligman to Everyone : A point has been made that nothing like this would ever be allowed in a place as pristine and magnificent as the Grand Canyon... so why are Disney doing this? Please listen and engage with BREEF, Save The Bays, The Waterkeepers Alliance and other conservation groups.

15:50:14 From Meryl Salzinger to Everyone : let her talk!

15:50:17 From Kristel Kingston-Anderson to Everyone : Better option. The future is eco tourism. Sustainability. We are going backwards looking for a quick dollar for the Bahamas and billions for foreign businesses. The Bahamas needs to change it's tourism format

15:50:18 From Edgar Seligman to Everyone : Well said Casuarina!!

15:50:22 From Ancilleno Davis @SciPerspective to Everyone : Thank you Dr. Phil Kramer, I did not hear the response to the direct dollar value per customer of the Disney guests.

15:50:24 From Sam's to Everyone : Lighthouse Point is a critical migration pathway for bonefish, grouper, and other commercially important fish because — it is just five miles from vital spawning sites. Shoreline disruptions to this area, such as the construction of a pier and increased boat and foot traffic, could disrupt this migration pathway and damage the fishing industries on Eleuthera and the economies of the Family Islands at large.

15:50:28 From Gregory Miller - CREST to Everyone : The draft EIA estimates that between 624,000 and 1,040,000 annual visitors will descend on the 154 acres of developed land and coastline, with rather standard tourism offerings around sun and sand, thrills, and no emphasis on ecotourism or cultural tourism options. ShThe high tourism density proposed by Disney conflicts with their corporate sustainability goals and is a recipe for degradation and overtourism at Lighthouse Point. Without significant modifications, it is likely that the activities outlined in the draft EIA could trigger intense ecological pressure with myriad negative impacts. CREST has identified several negative impacts of concern, where in many cases, the draft EIA does not adequately acknowledge or even address them. These include: poor visitor dispersal; noise, water, and air pollution; habitat degradation (land and marine); toxicity to corals from sunscreen; stress on endemic flora and fauna (with several species IUCN rated threatened and endangered); waste burning/incineration.

15:50:31 From Tod Hagan to Everyone : Let her talk!

15:50:45 From Chris Joyce to Everyone : this is BS that they keep cutting people off with real questions.

15:50:49 From Beth Hall to Everyone : Would like to hear her please

15:50:54 From Sam Brown to Everyone : +1

15:50:57 From ah to Everyone : People are tired of large corporations doing what has always been done.. please do the right thing

15:51:03 From Andy Mims to Everyone : Agreed. Let her talk.

15:51:10 From Matt to Everyone : get back to john's question, no time for speeches

15:51:10 From Kristel Kingston-Anderson to Everyone : Answer her questions

15:51:12 From Kerwin to Everyone : someone else ask that same question

15:51:21 From Glocat to Everyone : That's right. Just like the town hall meeting. Don't actually let people talk

15:51:31 From Emma Young to Everyone : These questions are too important, please give people space to speak

15:51:32 From Polly Motley to Everyone : Lighthouse beach is a national and global treasure. Under no circumstances should it be available for Disney. Having a cruise ship port on Eleuthera goes against everything this island is about...beauty and serenity and freedom from unfettered capitalism. It has been shown that cruises offer nothing to the ports of call. The environment of Lighthouse Beach is too fragile and special to be touched. This project is not following sustainable practices and Disney is ignoring the over 444,000 signatures that are calling for an economic and environmental assessment.

15:51:38 From Rebekkah to Everyone : answer her questions they're all related and valid and should be considered one question

15:51:52 From Sam's to Everyone : Disney and the government wouldn't know transparency if it Rolex over them in a truck!

15:51:52 From Christo Huntington to Everyone : This is simply a debate between what matters more: economic development of Bahamas Government + Disney or protecting the environment. What matters more to you? Money or pure nature?

15:52:25 From Marvin R. Z. Gibson to Everyone : 400,000 people do live in The Bahamas and, no, I do support her statement. What they did was garnered signatures from people all over the world who do not support Bahamians and have no intentions of providing support to Bahamians or providing alternatives to facilitate employment in the Bahamas. They have plenty talk about what is right and what is not but no alternative to provide or facilitate support to the economically depressed southern communities of Eleuthera.

15:52:29 From Polly Motley to Everyone : Responding to "the longterm assessment" being a 25 year consideration: 25 years is not long term.

15:52:34 From Glocat to Everyone : Christo wrong. Preserving the environment has a \$ value too

15:52:39 From Gregory Miller - CREST to Everyone : The draft EIA ignores the negative environmental impacts of tourist excursions on the environment, wildlife, and ecological integrity of LHP and the surrounding marine areas. Potential long-term negative impacts on marine mammals, corals, finfish populations, and overall ecological integrity of the marine environment are dismissed in the EIA with unsubstantiated claims that the project will have no impact on land or marine biodiversity. We particularly take exception to the March 10, 2021 DCL press notice that has the false and misleading headline, "EIA shows "no loss of biodiversity" expected for DCL's proposed LHP Project."

15:52:41 From Beth Hall to Everyone : Where can the EIA be found please

15:52:43 From Rashema Ingraham to Everyone : The EIA was conducted pre-covid and does not even mention the threat of pandemics, even though the cruise ship industry was one of the most affected industries. Eleuthera has very limited infrastructure and no hospital. Disney needs to resubmit supplemental studies to address the threats of Covid-19 and global pandemics.

15:52:44 From Meryl Salzinger to Everyone : We get to question the quality of the EIA because you said at the beginning that if we did not speak up you would assume that we were giving it our stamp of approval. Thank you Casuarina for putting it so eloquently

15:52:50 From Marvin R. Z. Gibson to Everyone : 400,000 people do NOT live in The Bahamas and, no, I do support her statement. What they did was garnered signatures from people all over the world who do not support Bahamians and have no intentions of providing support to Bahamians or providing alternatives to facilitate employment in the Bahamas. They have plenty talk about what is right and what is not but no alternative to provide or facilitate support to the economically depressed southern communities of Eleuthera.

15:52:53 From michael stevenson to Everyone : Leave Lighthouse point alone. Disney can only "extract" from it. We must end the business paradigm dependent upon extraction and mitigation.

15:53:39 From Chris Joyce to Everyone : get em scott

15:53:44 From Marvin R. Z. Gibson to Everyone : Provide a viable alternative for the survival of Bahamians and then we will talk.

15:53:50 From Jewel Edwards to Everyone : Bottom line is: What is BEST FOR ELEUTHERA.... there is an opportunity to bring all key stakeholders to the table to chart the way forward. I repeat: we need economic injections!

15:54:10 From Sam Brown to Everyone : 150 jobs is not going to improve the economy in southern Eleuthera — do not be fooled by this marketing scheme. The VP of Comms of Disney did this presentation. A masquerade

15:54:18 From Chris Joyce to Everyone : hurry Scott before they cut you off

15:54:25 From Glocat to Everyone : Eleuthera was setting record arrivals pre-Covid. Cruise ships at LHP will help reverse this trend

15:54:29 From Sam's to Everyone : Marvin Gibson you want 400k people to come to Eleuthera but, you don't care about the people who signed our petition

15:54:32 From Robin Carson to Everyone : Go Scott. Good question.

15:54:36 From Kishon Turner to Everyone : excellent question

15:54:41 From Chris Joyce to Everyone : eleuthera will bring it very very little from this project.

15:54:48 From Margo Blackwell to Everyone : Thank You Scott!

15:54:52 From Tod Hagan to Everyone : so the survey was not very comprehensive then

15:54:59 From Denny Rankine to Everyone : The object of most of the objectors here ,was never to work with Disney but to stop them. I'm also listening to the number of signatures on that petition. More people than we have in the entire damn country ! I guess you are more important or smarter than the actual Eleuthera residents.

15:55:02 From Marvin R. Z. Gibson to Everyone : 150 persons employed is 150 persons who are bringing food to their tables and not having to depend on Government to support them and go to Social Services and what not.

15:55:08 From Christo Huntington to Everyone : Why did the report exclude the fish then?!?!

15:55:15 From Aisha Miller to Everyone : Likely survey was NOT adequate.. what time period did they do it over?

15:55:20 From mollydavies to Everyone : This is an absurd self justifying presentation. Disney is not looking to support , educate, feed nor give opportunities too Bahamians. Disney is not seeking to preserve the marine environment by bring in cruise ships to Lighthouse Point. Disney is seeking to increase the value of its common stock.

15:55:33 From Gregory Miller - CREST to Everyone : On-land impacts of nearly one million visitors per year is dismissed in the EIA as not having a negative effect on the environment or biodiversity. However, CREST anticipates that the extremely high visitor density on such a small and fragile area will result in significant negative impacts from human foot traffic, waste generation, water purification and consumption, energy generation and sunscreen usage toxic to corals. the EIA does not make the case for narrowing the wealth gap and improving the wellbeing and economic benefit of local communities. There is a genuine risk of economic leakage with most of the economic benefits received by others outside Eleuthera and The Bahamas. This is a significant problem with the cruise industry in general, and a key goal for a responsible recovery is to ensure fair and equitable economic benefits for local communities.

15:55:37 From Christo Huntington to Everyone : @MollyDavies agreed...

15:55:41 From Dr. Bently Higgs to Everyone : With at least 150 Bahamians expected to be employed and good benefits mentioned to be included in the employees compensation packages, will the benefits include offerings of shares to employees and/ or possibly the general public?

15:55:42 From Ancilleno Davis @SciPerspective to Everyone : surveys were from oct 2017 and are ongoing

15:55:49 From Jewel Edwards to Everyone : Exactly @ Marvin Gibson!!! I work with my people every day and hear their cries!!

15:55:57 From Brooke Muggia to Everyone : Disney kicked 2 of my local friends out of the last meeting because they opposed the project. they have lived on the island for over a decade and have a small business.

15:56:03 From Bianca to Everyone : You have a solar power generator array listed as part of the BOH infrastructure, why not invest more in electric vehicles and charging stations?

15:56:07 From Aisha Miller to Everyone : Bahamians let's think long term! Cruise ship passengers DO NOT spend hardly anything compared to plane visitors. Short term economic gain for few with lifetime damages

15:56:29 From Christo Huntington to Everyone : @AishaMiller great point!

15:56:29 From Chris Joyce to Everyone : piping plovers in new York is an automatic stop to work. why arent they being acknowledged.

15:56:31 From Robin Carson to Everyone : Do you mean the Bonefish Trust aren't concerned with the turbidity created by both the ship thrusters, the marina, but more importantly, the swimming activity?

15:56:39 From Sam's to Everyone : Maybe if you read our letter you'd see all the studies we noted!

15:56:47 From Heather Stanford to Everyone : Marvin you know good and well how many visitors from outside of the Bahamas bring positive economic growth.

15:56:50 From Robin Carson to Everyone : I find that very hard to believe.

15:56:56 From Gregory Miller - CREST to Everyone : More detailed targets should be cited within the EIA that solidify the role of the local community within port operations. Similar targets that have been established in the construction process (overall ratio of 80 percent Bahamians) should also be created for ongoing employment in port operations, as well as for the other socio-economic commitments that do not currently establish concrete dimensions for success. Disney must also ensure that all port employees and local third-party vendors are subject to fair wages and just bargaining processes. Markers should be established to determine the ratio and revenues of duty-free shops and international brands to local shops and vendors in port, as to maximize benefits to the local economy and reduce economic leakage.

15:57:41 From Sam Brown to Everyone : 150 JOBS FOR BAHAMIANS- HOW MANY JOBS WILL BE IMPORTED? 150 IS SEEMINGLY A FRACTION

15:57:43 From Meryl Salzinger to Everyone : An alternative plan for Lighthouse point would also bring jobs to South Eleuthera - if you talk to the folks at One Eleuthera you will see that was part of their alternative plan. Why didn't Disney think that an alternative from a local and well respected true community development group in south Eleuthera, like One Eleuthera, was worth considering?

15:57:44 From Aisha Miller to Everyone : Will those jobs be manager positions?

15:57:48 From Emma Young to Everyone : Permanent jobs

15:57:53 From Emma Young to Everyone : I think is the question

15:58:03 From Chris Joyce to Everyone : that's not what she asked.

15:58:16 From Meryl Salzinger to Everyone : Intention means no promises

15:58:21 From Aisha Miller to Everyone : Intention and what they do is very different

15:58:34 From Meryl Salzinger to Everyone : we anticipate is also not a promise or a guarantee

15:58:40 From Aisha Miller to Everyone : No guarantee... anticipate

15:58:43 From Kishon Turner to Everyone : how many foreigners will be working when the project is completed

15:58:46 From karen gowen to Everyone : No one buys goods at the other site right around the corner!

15:58:47 From Meryl Salzinger to Everyone : How much will locals have to pay to sell goods at your site?

15:58:50 From Christo Huntington to Everyone : "We anticipate" is a failure in that promise.

15:58:54 From Emma Young to Everyone : So no guarantee for permanent jobs for Bahamians

15:59:07 From Bianca to Everyone : So in other words, it is up to the locals to create jobs around Disney's new venture.

15:59:13 From Heather Stanford to Everyone : If Princess Cruises has not provided positive economic outcomes to S Eleuthera what makes you think Disney will???? These people use Disney credit cards. They don't leave the Disney compound.

15:59:14 From Sam Brown to Everyone : Correct Bianca

15:59:17 From Alison Salzinger to Everyone : Are these jobs for Eleutherans?

15:59:18 From Sam's to Everyone : What% will Disney keep from their vendors?

15:59:19 From Glocat to Everyone : Ms. Kim I feel for you. I know you don't believe what you saying

15:59:23 From Kristel Kingston-Anderson to Everyone : So the artisans and others may not be Bahamians? tour operators may not be Bahamian? What is the estimated number of jobs at this site total above and beyond Bahamian?

15:59:34 From Chris Joyce to Everyone : she sounds like Jenn psaki. we will circle back to that.

15:59:41 From Holly to Everyone : No way! I have put numerous posts. Disney has credit cards and that is how everyone pays It is cashless

15:59:46 From Meryl Salzinger to Everyone : Exactly what will locals have to do to be able to sell at your site?

15:59:58 From michael stevenson to Everyone : What is best for Eleuthera must be what is best for all of the eco-community at Lighthouse point. We can't trade/sacrifice our eco-community for jobs. We can only begin to make that sort of deal from a position of alienation.

16:00:04 From Robin Carson to Everyone : My question: I want to know exactly how Disney is going to handle both the sewage and the refuse from this sight.

16:00:23 From Matt to Everyone : the insurance coverage mandated by cruise lines makes it extremely difficult for even medium sized businesses to offer tour excursions, never could a small business offer cruise ship verified excursions

16:00:33 From Christo Huntington to Everyone : American Imperialism at its best.

16:00:37 From Holly to Everyone : Please Grants those who want help

16:00:39 From Tamika Galanis to Everyone : This job rhetoric is tired, and unfortunately successful in this country's history of tourism.

16:00:44 From Heather Stanford to Everyone : Ms Prunty you are WRONG. CTI and One Eleuthera have been doing this for years

16:00:46 From Sam Brown to Everyone : Grants to train people to think how you want them to think

16:01:04 From Glocat to Everyone : exactly Tamika (Tom Glucksmann here by the way) #disneyswingus

16:01:06 From Heather Stanford to Everyone : She just lied or is grossly unaware of One Eleuthera and CTI

16:01:15 From Kristel Kingston-Anderson to Everyone : There is a newly formed Global Sustainable Tourism Council. Please work with them too.

16:01:29 From Kelly Arkles to Everyone : Heather Stanford — AGREE!!!!

16:01:31 From Meryl Salzinger to Everyone : Yes One Eleuthera has been doing economic and community development for years. And the locals know that and we support them and trust them

16:01:41 From Christo Huntington to Everyone : Why doesn't Disney simply donate to those supporting causes instead of building an environmentally damaging project?

16:01:41 From Holly to Everyone : Eleuthera is not the US Getting people ready Have you ever asked when will you be here? 9 am mon and at 11 you are waiting Workforce development

16:01:48 From Elizabeth Wallace to Everyone : Who will be conducting the bonefish tagging study and how will it be monitored to adequately assess usage of the area as a migration corridor? What is the timeframe for this study? The current draft of the EIA does not address this.

16:01:54 From Holly to Everyone : that will be their excuse

16:01:57 From Robin Carson to Everyone : Of part of the sewage "program" is going to be a holdings/seepage pond like Castaway Cay has (reported by two employees that I know of) I have a huge problem with it.

16:02:05 From casuarinamckinney to Everyone : What are the economic benefits for people in Eleuthera from Princess Cays or Little San Salvador (Half Moon Cay)? There are already two other private cruise ports within a few miles of Lighthouse Point that have not delivered on the promised benefits.

16:02:15 From Sam's to Everyone : The EIA barely addresses climate change and sea-level rise. The EIA claims that the "Project is not expected to have a material impact on climate change" but provides no evidence. This is a massive gap. Cruise ships are well-known emitters of greenhouse gases.

Disney has provided no Environmental Management Plan at this point, leaving us with no knowledge about how they will mitigate and monitor impacts of port construction and operation on the environment. We need an Environmental Management Plan in order to meaningfully assess the sustainability of the project.

The EIA doesn't address the cumulative impacts of 3 cruise ports 20 miles of each other.

16:02:50 From Meryl Salzinger to Everyone : I'm sorry you can not tell us now about your plans for waste? But you want us to say this is all ok?

16:03:01 From Holly to Everyone : Goal is 0 waste. How many pieces of crap have you gotten on your beach

16:03:08 From Mike Mason to Everyone : straw equate to roughly .07% of plastic waste

16:03:12 From Alison Salzinger to Everyone : recycling is a joke

16:03:22 From Christo Huntington to Everyone : Cruises are the epitome of American gluttony and overconsumption. Gas, food, waste, etc., will blow up this island.

16:03:30 From Holly to Everyone : throw your stuff off the ship

16:03:40 From Rebekkah to Everyone : my 11 year old son makes a good point there are other types of waste that aren't plastic

16:03:42 From Holly to Everyone : leave it on the beach

16:03:44 From Chris Joyce to Everyone : I agree christo huntington

16:03:50 From Jewel Edwards to Everyone : I am a strong proponent of One Eleuthera/CTI and their work. I believe there is a way to work synergistically in spite of what has happened to this point. We must remain open-minded! That's true democracy!

16:04:06 From Brooke Muggia to Everyone : Disney kids all over the world are watching

16:04:15 From Holly to Everyone : Then we need to make them do it

16:04:28 From Glocat to Everyone : Open minded, yes Jewel, but with no cruise ships there

16:04:33 From Rashema Ingraham to Everyone : With 360 days of sunshine how will Disney use this natural resource to generate energy and move from fossil fuels becoming a completely sustainable zone?

16:04:34 From Alison Salzinger to Everyone : incinerating plastic?

16:04:36 From mollydavies to Everyone : Please This is an absurd self justifying presentation. Disney is not looking to support, educate, train , feed nor give serious opportunities too Bahamians. Disney is not looking to protect the marine. Environment

16:04:44 From Christo Huntington to Everyone : "Let's burn our trash"

16:04:57 From Beth Hall to Everyone : No burning!

16:05:00 From Holly to Everyone : Limited number of people to go to the beach and an environmental tour.

16:05:01 From jessica minnis to Everyone : Will this place be open only when the ship is in port or open year round?

16:05:03 From Meryl Salzinger to Everyone : Also what are you going to do about the gallons of suntan lotion coming off the crowds of people you are bringing? that lotion has been shown to kill coral when there is only small amounts.

16:05:11 From Glocat to Everyone : Go Kelly!

16:05:47 From Mike Mason to Everyone : if my question does not get answered I really want to ask this.

16:05:50 From karen gowen to Everyone : great question!

16:05:55 From Bianca to Everyone : Yes we are "allowed" to be on the beaches that we are already granted by law.

16:06:16 From Edgar Seligman to Everyone : How is Disney's plan for Lighthouse Point better than One Eleuthera's/BNT's plan? Ms Prunty said Bahamian ownership is important. The One Eleuthera/BNT plan guaranteed that the property would belong to The Bahamas and Bahamians FOREVER. Disney will be gone the minute they start losing money, whether that eventuality comes about by way of a pandemic, a hurricane or other natural disaster

16:06:18 From Heather Stanford to Everyone : via what road??

16:06:20 From Mike Mason to Everyone : what she asked was about non citizens

16:06:29 From Glocat to Everyone : I can't wait to get down there with 3-4,000 cruise passengers ...

16:06:29 From Robin Carson to Everyone : 1,000,000 visitors a year and we are basing it on "hope there is developing technology to deal with it"

16:06:39 From karen gowen to Everyone : visitors are not residents and citizens

16:06:40 From Aisha Miller to Everyone : Exactly

16:06:41 From Chris Joyce to Everyone : Jenn psaki. answer the damn question.

16:06:49 From Bianca to Everyone : My concern is that we will be in the same situation we frequently find ourselves in with Atlantis.

16:07:05 From Beth Hall to Everyone : Thank you Robin

16:07:21 From Heather Stanford to Everyone : Lighthouse Point is the #1 attraction per TripAdvisor. IT will be miles away from the public beach

16:07:23 From Chris Joyce to Everyone : yes yes yes.

16:07:26 From Mike Mason to Everyone : got married at LHP

16:07:52 From Glocat to Everyone : thank you Ms. Arkles: RECORD ARRIVALS pre-Covid. Economy is coming back, but not with cruise ships

16:08:01 From Meryl Salzinger to Everyone : nice Kelly. You speak the truth. I feel completely ignored and taken for granted

16:08:04 From Mike Mason to Everyone : hired a bahamian photographer. Mr Culmer wed us. 4 locals set it up

16:08:34 From Alison Salzinger to Everyone : yes

16:08:50 From Meryl Salzinger to Everyone : Yes GLocat!

16:08:55 From Tod Hagan to Everyone : spot on Sam

16:08:57 From Chris Joyce to Everyone : get em.

16:09:01 From Jules Holland to Everyone : Yesss!

16:09:03 From Kelly Arkles to Everyone : EXACTLY!!! Wonderful point, Sam!!!!

16:09:04 From Chris Joyce to Everyone : exactly

16:09:08 From Denny Rankine to Everyone : What is so interesting is that so many of the people that object to this project are continuing to build their own mini Disney's all over this Country . We all see this every day but choose to be selective with their objections..

16:09:11 From Meryl Salzinger to Everyone : preach!

16:09:11 From Aisha Miller to Everyone : Exactly

16:09:23 From Edgar Seligman to Everyone : Correct Sam! ✓✓✓

16:09:33 From michael stevenson to Everyone : Yes, lighthouse point is a sacred area.

16:09:33 From Meryl Salzinger to Everyone : Only one ship the size of an apartment building

16:09:44 From Alison Salzinger to Everyone : 3800 passengers?!

16:09:48 From Glocat to Everyone : Mr. Rankine, Wrong again. Small time homeowner are most of them. Keep trying

16:09:54 From mollydavies to Everyone : Disney is not looking to educate , employ, train nor ad vance Bahamians. Disney is not looking to protect the marine environment of Lighthouse Point by bringing in cruise ships. Disney is looking to increase the intrinsic value of its common stock. Please

16:09:55 From Beth Hall to Everyone : Will there be new Mega ships as well?

16:10:08 From casuarinamckinney to Everyone : What about Eleutherans who would like to run tours for stay-over visitors (visitors who contribute much more to the local economy than cruise passengers) to Lighthouse Point? Will they still be able to visit the crown land at the tip of Lighthouse Point? People travel to Eleuthera and stay because they want to visit Lighthouse Point in its pristine condition, and the economic cost of losing this this need to be considered. Has it been considered?

16:10:12 From Sam's to Everyone : You haven't answered the question Kim

16:10:29 From Tamika Galanis to Everyone : There's NO WAY for you to reasonably control that.

16:10:30 From Alison Salzinger to Everyone : 3x the population of Eleuthera

16:10:33 From michael stevenson to Everyone : Stop the extraction paradigm.

16:10:39 From eliza to Everyone : Is Disney going to stop selling Disney Brand reef-unsafe-sunscreen (branded with Frozen etc)

16:10:42 From Rebekkah to Everyone : then take them somewhere else!

16:10:43 From Heather Stanford to Everyone : That's a laugh!!!! Disney guest visiting "real places"  
HAHAHAHAHA

16:10:48 From Holly to Everyone : only 2800 to 3400 people my god. we see no more than 15 people. Survey guests. I saw them; on my trains PIGS

16:10:48 From Fax Bahr to Everyone : How do you ensure the sunblock is eco friendly? No way. 1,000 swimmers a day slathered in toxic sunblock - all leaching into those waters - an extraordinary impact to the marine life/ecosystem. Is that in the EIS?

16:10:56 From Sam's to Everyone : You have not addressed 1 million people a year on the site

16:11:00 From Glocat to Everyone : Yes Jeremy!!!! Sarah!!!!

16:11:01 From Meryl Salzinger to Everyone : In my experience Disney guests are looking for a sanitized version of nature. There is nothing wrong with them wanting that. But that is not Eleuthera.

16:11:09 From Aisha Miller to Everyone : Help protect?! By bringing a boat load of minimally paying day trippers. Leave it alone

16:11:11 From Jillianl Bartlett to Everyone : Eleuthera is the safest Island we have in the Bahamas. it's not Nassau ..?

16:11:21 From Matt to Everyone : What mandates will there be to ensure that the ship turning basin will be in water over 100ft deep off the edge? Bow thrusters and stern props kick up huge amounts of sand/silt

16:11:29 From Denny Rankine to Everyone : Seeing that we are also talking about who should do what in which country, why is most of the flack here is coming from outside of this country ?

16:11:33 From Mike Mason to Everyone : my question - with over a million visitors and attempting to utilize local fish to feed these visitors, what will this do to local fishermen that rely on the population to supply on island restaurants, the fish fry, put food on their own table. What is being put into place to protect the local fishing population in order to preserve fish for the local population?

16:12:10 From Edgar Seligman to Everyone : Good point Jeremy!

16:12:13 From Glocat to Everyone : Plenny from right inside the country Mr. Rankine. Bahamian born brudda.

16:12:36 From Alison Wellford to Everyone : data with no bonefish?

16:12:43 From Annie Muggia to Everyone : But those facts missed an entire population of bonefish? Doesn't seem very thorough

16:12:43 From Tod Hagan to Everyone : not facts since the bonefish populations were missed

16:12:44 From Aisha Miller to Everyone : Facts when someone clearly stated that bonefish were present and then someone stuttered a response

16:12:59 From Margo Blackwell to Everyone : Last place in the Planet left like it... a one of a kind! Priceless.

16:13:05 From Edgar Seligman to Everyone : Mr Rankine, plenny flak comin from right here in Lutra!

16:13:08 From Tod Hagan to Everyone : what else was missed?

16:13:16 From Heather Stanford to Everyone : so approve the plan then figure out how to deal with waste????

16:13:23 From Mike Mason to Everyone : thank you hank for the direct message didn't know that

16:13:24 From Holly to Everyone : their facts do not address that they sell bad products and do not do what they say

16:13:34 From iPhone to Everyone : Im horny

16:13:37 From casuarinamckinney to Everyone : When will the draft Environmental Management Plan be made public?

16:13:42 From Chris Joyce to Everyone : haha

16:13:51 From hank ferguson to Everyone : EMP is after any revisions or recommendations to the EIA - Again its a legal process

16:13:56 From Azaleta Ishmael-Newry to Everyone : Thank you Sir!

16:14:02 From Jewel Edwards to Everyone : What is best for Eleuthera - that's the bottom line.

16:14:03 From Gregory Miller - CREST to Everyone : CREST has studied this extensively and stay over tourists generally spend 7 to 10 times more than a cruise tourist, sometimes more. In fact, I expect that 1 million Disney passengers will spend next to nothing other than buying some curios. The draft EIA does not come close to a sustainable destination management, does not meet any Global Sustainable Tourism Council (GSTC) site sustainability (CREST is a member and close partner of GSTC). We urge Disney to 'hit the brakes' on this project, regroup and get the kind of sustainable tourism criteria and the right science to answer pertinent questions. There is a better way. Both the EIA and EMP (missing for now) must be improved and vetted to meet international standards PRIOR to decision making, not when construction begins.

16:14:04 From Alison Salzinger to Everyone : ys

16:14:22 From Tod Hagan to Everyone : agree, Casuarina can have my minute

16:14:35 From Kristel Kingston-Anderson to Everyone : I give my 1 minute to Casaurina, I'm not using it

16:14:45 From Chris Joyce to Everyone : responded to and seen by no one.

16:14:47 From Mike Mason to Everyone : yeah Kristel!!!

16:14:49 From Beth Hall to Everyone : Thank you

Casuarina needs the floor

We would like to hear

16:14:57 From Chris Joyce to Everyone : she's got my minute.

16:15:15 From Robin Carson to Everyone : Ok cede my minute to Casuarina.

16:15:52 From Glocat to Everyone : thank you Dr. Davis

16:16:06 From michael stevenson to Everyone : Educate you Disney consumers through your projects to be really responsible for environmental restoration.

16:16:15 From Glocat to Everyone : the JOBS LOST must be accounted for

16:16:16 From Amina Moss to Everyone : Good point Dr. Davis

16:16:18 From Alexander Nowatkoski to Everyone : Disney wont make money from that so why should they...

16:16:19 From Kristel Kingston-Anderson to Everyone : Here here! 50% or more of our tour business is taking guests to Lighthouse. This will hurt my business greatly

16:16:44 From Jillianl Bartlett to Everyone : This is too clinically and person must be allow to ask the question unfinished. This is our country and every question is important....all these deferral and we know this Government doesn't listen to it's Bahamians.

it's same as another exclusive deal yes they give Bahamians jobs....this isn't anything new.

16:16:55 From iPhone to Everyone : <https://imageshare.best/MQHCB7>

16:16:59 From iPhone to Everyone : Look

16:17:24 From Heather Stanford to Everyone : Ok cede my minute to Casuarina

16:17:59 From Heather Stanford to Everyone : what will it take to STOP DISNEY?

16:18:11 From Alexander Nowatkoski to Everyone : With construction expected to be 34 months, how will Disney and their respective contractors maintain cleanliness throughout the construction site and eliminate any disturbance to non-developed areas, especially the ocean?

16:18:31 From Jewel Edwards to Everyone : We are very clear. Bahamians and Eleutherans first. We understand that any investor brings in levels of expertise which is clarified in the MOU. Our government needs to collaborate to make sure Disney keeps Bahamians front of mind.

16:18:39 From Kristel Kingston-Anderson to Everyone : Garbage can out there is overflowing right now

16:18:50 From Mike Mason to Everyone : can't conserve whats not there for future generations if it's converted to a port

16:19:27 From Covid19edu3 to Everyone : Thank you Disney for choosing Eleuthera

16:19:32 From Bianca to Everyone : Given that Disney has abandoned parks before, what would happen should the same happen to Lighthouse Point? Will we be stuck with a rotting husk or will Disney agree to dismantle what they built?

16:19:34 From Heather Stanford to Everyone : some ask about the Oxford Study

16:19:41 From Marcie Keever, FoE (she/her) to Everyone : Marcie Keever from Friends of the Earth US After reviewing the EIA for this project what I would comment is missing from the EIA is the impact of bringing large cruise ships in to this area – specifically, how many cruise ships are planned for the development on a weekly and annual basis? With planned new ships from Disney, what is planned for future years regarding ship dockings? What is also missing is the impact these ships will bring to the water quality and environment of the area – the impacts of cruise ship wastewater and other toxic discharges and the impacts of bringing these large ships into Lighthouse Point and the impacts to water quality and clarity. I will submit a recent study from Florida International University documenting the water clarity improvement in Key West, Florida while cruising has been on hold due to COVID. Thank you.

16:19:46 From Matt to Everyone : Find out the insurance coverage necessary to provide excursions via any cruise line booked thru the ships. you will be shocked

16:20:14 From Elizabeth to Everyone : How many Bahamians are currently employed at Castaway Cay and how many of those jobs will disappear if the Lighthouse site is opened. How many artisans and entrepreneurs are currently making a living in association with Castaway Cay.

16:20:14 From Christo Huntington to Everyone : Leaving forest in tact? You're already interfering with the forest by developing the land.

16:20:19 From Matt to Everyone : the ships generators will be running the whole time, a little bit of solar for lights on land wont matter mych

16:20:29 From Holly to Everyone : He sounds old and dotty. Not with it

16:20:33 From Christo Huntington to Everyone : Man this is frustrating.

16:20:36 From Beth Hall to Everyone : Put solar on every roof top

16:20:43 From Glocat to Everyone : WELL DONE EVERYONE. AN OBVIOUS HUGE 'NO' TO DISNEY (OR ANY CRUISE) AT LHP

16:20:53 From Heather Stanford to Everyone : Jewel how has Princess benefited S Eleuthera so far?

16:20:54 From Sam's to Everyone : If you want to learn more about this project please go to Stop Disney.com and sign up

16:21:01 From Galaxy A20s to Everyone : THANK YOU....YES TO DISNEY

16:21:02 From michael stevenson to Everyone : What you will be teaching our young really is that they are still colonial subjects in their own land facilitating the further unnecessary pillage of the environment.

16:21:04 From Alexander Nowatkoski to Everyone : <https://www.change.org/p/the-walt-disney-company-last-chance-for-lighthouse-point-2>

16:21:05 From Marjie Findlay to Everyone : If Disney leaves at any time, has the government gotten an agreement that they will leave the site pristine the way they found it?

16:21:10 From Dr. Leno Davis @SciPerspective to Everyone : For consistency, throughout the EIA and in any public communication, please always refer to the Passenger limits in terms of paying guests and employees. the max is 4000 I believe including employees.

16:21:11 From Heather Stanford to Everyone : #STOPDISNEY

16:21:15 From Jewel Edwards to Everyone : As a native Eleutheran, Disney please be assured of my support and my continued lobbying on all levels for us to bring key stakeholders to the table for collaboration.

16:21:19 From Heather Stanford to Everyone : #STOPDISNEY

16:21:27 From Christo Huntington to Everyone : #STOPDISNEY

16:21:42 From Tod Hagan to Everyone : #STOPDISNEY

16:21:44 From Meryl Salzinger to Everyone : Just from the questions and the chat do you now see that there a lot of people with a lot of problems with this project as you have outlined it so far?

16:21:47 From Denny Rankine to Everyone : Where the hell were all of you while all of the dredging was taking place in Treasure Cay and continue to go on all over the Bahamas. Ruining million of our seabed for Aragonite ect..?

16:21:47 From Heather Stanford to Everyone : #STOPDISNEY

16:22:05 From Glocat to Everyone : Jewel a few hundred vs. hundreds of thousands

16:22:06 From Heather Stanford to Everyone : Is anyone here from Spanish Wells that can speak to Egg Island?????

16:22:11 From Mike Mason to Everyone : design building is garbage. means you can adjust the scope how ever you want as you go

16:22:24 From Meryl Salzinger to Everyone : Thank you Mike

16:22:24 From Anthony Johnson to Everyone : Will there be any black Bahamians in senior executive management positions? If so, in what capacity

16:22:25 From Robin Carson to Everyone : The didn't say one word about where the hell they are going to put a million visitors human waste...

16:22:26 From Heather Stanford to Everyone : #STOPDISNEY

16:22:26 From Matt to Everyone : what fuel will be burnt by ships docked at lhp? diesel or bunker c?

16:22:27 From Mike Mason to Everyone : commit to a scope

16:22:39 From Bianca to Everyone : Diesel

16:22:41 From Tod Hagan to Everyone : <https://www.stopdisney.com/>

16:22:42 From Heather Stanford to Everyone : #STOPDISNEY

16:22:43 From Glocat to Everyone : #disneyswingus

16:22:43 From Aisha Miller to Everyone : #STOPDISNEY

16:22:51 From Amina Moss to Everyone : Doubt it Anthony

16:22:53 From Dr. Leno Davis @SciPerspective to Everyone : I can be reached at Ancilleno@scienceandperspective.com for additional comments

16:22:56 From Mike Mason to Everyone : Stopdisney.com

16:23:01 From Beth Hall to Everyone : When will you have another meeting?

16:23:04 From Heather Stanford to Everyone : #disneyswingus

16:23:11 From Edranique Thompson to Everyone : I think a SOUTH ELEUTHERA meeting is necessary 😊

16:23:15 From Scott Sawyer to Everyone : This may have been said previously, but I haven't read all 200+ comments. The bonefish spawn aggregation sites off from LHP contain bonefish from Andros, Exuma Cat, as well as Eleuthera. This may be damaging to multiple fisheries.

16:23:16 From Heather Stanford to Everyone : WHAT WILL IT TAKE TO STOP DISNEY???

16:23:32 From Demarco Mott to Everyone : I note my mistake with island. Please Pardon.

16:23:40 From Chris Joyce to Everyone : so let's be here all night. this is important

16:23:51 From Kelly Arkles to Everyone : Eleutherans and ALL Bahamians have the savvy to be self-sufficient! One Eleuthera and CTI supports that. Big corporation and FOREIGN to the Bahamas is NOT the answer! Give your constituents the support and ability to thrive outside of corporations like Disney or Princess or Carnival...when will everyone realize that you have all you need to thrive?

16:23:54 From Alison Wellford to Everyone : this sounds like nightmare of neocolonialism— do not trust disney

16:23:58 From Jacob Scherr to Everyone : Please go to [www.stopdisney.com](http://www.stopdisney.com) to get updates for plans for additional public consultations to go beyond this truncated session.

16:24:04 From Bianca to Everyone : Did the studies include migratory bird populations?

16:24:04 From Holly to Everyone : we need a coordinator and an effort.

16:24:07 From Sam's to Everyone : So Disney is going to address all these issues?

16:24:16 From Heather Stanford to Everyone : address the 1 million visitor a year question!

16:24:20 From Sam's to Everyone : In 21 days?

16:24:20 From Alison Salzinger to Everyone : what is the email for comments

16:24:24 From Glocat to Everyone : if there are any in person meetings we need to SHOW UP folks.

16:24:29 From Kristin's iphone to Everyone : The question on whether Bahamian tour guides/operators would be allowed access to the site with their guests was not answered. The question on what % in dollars Disney will take of vendors/tour operators business was not answered.

16:24:33 From Heather Stanford to Everyone : #STOPDISNEY

16:24:38 From Denny Rankine to Everyone : What you should focus on is stopping all of that Aragonite piracy shit ..

16:24:39 From Glocat to Everyone : don't let the bullies intimidate you

16:24:42 From Jewel Edwards to Everyone : Thank you for the presentation. Thank you Director Newbold for moderating with professionalism.

16:24:43 From Jules Holland to Everyone : #stopdisney

16:25:10 From Tod Hagan to Everyone : Bonefish spawning sites as documented by Cape Eleuthera Institute: <http://www.ceibahamas.org/ceinews/2016/12/02/investigating-bonefish-spawning-aggregations-on-eleuthera-the-bahamas-migrations-predators-and-environmental-cues>

16:25:11 From Chris Joyce to Everyone : boycott Disney

16:25:13 From Glocat to Everyone : great job Ms. Newbold. Let DEPP bring da noise

16:25:16 From Heather Stanford to Everyone : bad press is Disney's nightmare

16:25:30 From Imac's iPhone to Everyone : STOP the commercialism!!

16:25:33 From Denny Rankine to Everyone : Full speed ahead Disney..

16:25:34 From Beth Hall to Everyone : Thank you

We have many more questions

Need more meetings

16:25:37 From Alison Wellford to Everyone : I'm a journalist and will write an article

16:25:40 From Heather Stanford to Everyone : WE ALL HAVE CONCERNS!!!!

16:25:42 From Glocat to Everyone : say substantive concerns

16:25:46 From Yvette Charlton to Everyone : Thank you for the presentation Dr. Newbold!!!

16:26:26 From Silas V. Cooper to Everyone : Thank you Ms. Newbold

16:26:48 From Covid19edu3 to Everyone : We live here and know what we needWe live here and know what we need. We cant go to any country and tell them what is best for their country and say what is best for them

16:26:56 From Heather Stanford to Everyone : Please do not give them the permit!

16:27:00 From Bianca to Everyone : What is the mitigation plan for spill and leakage for the above ground fuel storage? We do not want a repeat of Grand Bahama.

16:27:12 From Chris Joyce to Everyone : who is the lady talking? what side is she on?

16:27:21 From Jewel Edwards to Everyone : Eleutherans know what is best for Eleuthera!

16:27:27 From Jillianl Bartlett to Everyone : please add email please

16:27:28 From Elizabeth to Everyone : I should amend my question to specify How many Bahamians are currently employed with permanent, full-time positions, at Castaway Cay and how many of those jobs will disappear if the Lighthouse site is opened. How many Bahamian artisans and entrepreneurs are currently making engaged in making their living (equivalent to full-time, permanent position) in association with Castaway Cay.

16:27:28 From Kristin's iphone to Everyone : How can a project be given approval without providing a comprehensive waste management plan? I.e. waste management needs to be a part of the EIA, not an afterthought only addresses in the EMP.

16:27:32 From casuarinamckinney to Everyone : Could you please clarify the steps after the public consultation report is created? For example, this was the report that was created for the proposed South Abaco project:

<https://www.southabacotyrsozpublicconsultation.com/files%20for%20downlaod/Public%20Consultation%20Report%2002%20Mar%202021%20-%20Final.pdf> but we're not sure about the next steps.

16:27:33 From Christo Huntington to Everyone : Although I am against the development all together, I appreciate the panelists time and consideration.

16:27:35 From Nicoya Taylor to Everyone : Thank you for this informative meeting and giving persons the opportunity to voice opinions and ask questions.

16:27:37 From Covid19edu3 to Everyone : Thank yo Jewel

16:27:39 From Glocat to Everyone : let the educated Bahamian scientists have their say, not the less educated, Too big of a decision

16:27:40 From Fax Bahr to Everyone : Poor presentation from Disney...

16:27:40 From Denny Rankine to Everyone : On fff drugs..

16:27:43 From Heather Stanford to Everyone : DO NOT GIVE THEM THE PERMIT

16:27:46 From Dr. Leno Davis @SciPerspective to Everyone : The Lady speaking is Director of DEPP. Excellent job moderating

16:27:50 From Edranique Thompson to Everyone : Thank very much for the presentation. WE SOUTH ELEUTHERANS hope to have another meeting

16:27:51 From Galaxy A20s to Everyone : There's no side..It's the people of Eleuthera

16:27:53 From Anthony Johnson to Everyone : she represents Bahamas environmental director

16:27:54 From Jacob Scherr to Everyone : Thanks

16:28:00 From Jewel Edwards to Everyone : #EleutheraStrong

16:28:07 From Heather Stanford to Everyone : #STOPDISNEY

16:28:14 From Glocat to Everyone : #nationalparkforeleutheranow

**6.0 ATTACHMENT C: QUESTIONS EXTRACTED FROM PUBLIC MEETING CHAT  
TRANSCRIPT**

Chat Questions & Responses from Public Meeting 4/8/2021 Updated 5/6

Alison Salzinger	What steps are being taken to protect the reefs from extra silt that will kill already stressed coral reefs?	<p>EIA Section 3.1.1.2 Beaches; Section 3.1.2.2 Beach Construction/Structures; 3.1.2.1 Navigation Channels/Basins</p> <p>The beach/swimming areas will be located where natural sand beaches currently occur on the south, southwest and along the southeast coast (north of the actual point). All these areas are relatively stable sand beach areas that naturally hold and accrete sand. To increase the beach usage area, guest beach areas will be expanded landward, and new sand will be placed on the upland where needed. Coastal stabilization structures will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. Beach expansion is planned landward of the foredune.</p> <p>The coastal stabilization structures will consist of low-lying native rock and materials, including vegetation and temporary sand fencing installed during storm events. The intent of the structures is to contain sand during times of extreme water levels from hurricanes and reduce wind-borne migration of sand. The structures will also delineate beach areas to keep guests out of non-swimming and protected areas.</p> <p>Disney’s planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor but will still cause some impacts to the seafloor associated with placement of structures (concrete piers, limestone revetment). A detailed analysis of benthic resources including corals within the footprint of the marine facilities was undertaken in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Detailed benthic surveys using transects placed within the proposed development footprint quantified the species, density, and size of corals and other sessile invertebrates within the impact areas. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of <u>individual corals</u> could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.</p> <p>The open-trestle pier berth design places the ship in approximately 35 ft waters and the majority of the sea floor below is hard bottom with a very thin layer of coarse sand over rock. This depth places the ship’s propellers/thrusters propwash more than 20 feet above the sea floor. This depth</p>
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		<p>and the horizontal direction of the propwash greatly limits if not eliminates any turbidity issues or disturbance of the sea floor by the wash. Even if the propwash would contact the sea floor, the sand surveyed beneath the berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions.</p> <p>Moreover, Disney anticipates only minimal accumulation of fine sediments to the seafloor in the ship berthing area during the construction phase of the Project as there will be no dredging. While the expectation of turbidity related impacts to reefs are unlikely, turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.</p> <p>Disney has a team of coral scientists and conservationists as well as nonprofit conservation partners that have developed a successful model for rehabilitation to declining habitats caused by global changes near Castaway Cay, increasing coral coverage on the reefs at that site and seeing the methods being expanded to other areas of The Bahamas through ongoing collaboration. Disney will continue surveying and use adaptive management strategies to continually address any changes in the marine environment surrounding Lighthouse Point. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES (page 7-3)</p>
ArthiaNixon	where can people submit via email please?	This information was shared on screen during the public meeting as well as through public notice in local newspapers. Feedback was collected via e-mail by visiting <a href="http://www.lighthouse.com">http://www.lighthouse.com</a> or e-mailing the Department of Environmental Planning and Protection directly at: <a href="mailto:inquiries@depp.gov.bs">inquiries@depp.gov.bs</a> . As shared by DEPP Director Newbold, feedback had to be received by May 7 at 5pm to be included in the final EIA comment report.
Meryl Salzinger	Where's the Oxford Economy report?	<p>A summary of the economic impact study can be found in the EIA Appendix H - Socio-Economic Study. The full study has been included in Public Consultation Report. Direct economic impacts can be found in the Heads of Agreement located in Appendix I of the EIA.</p> <p>Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in</p>

		<p>Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.</p> <p>The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
Tod Hagan	Which organizations peer reviewed and verified accuracy of the Oxford Economy Report?	The economic impact study conducted by Oxford Economics has not been peer reviewed, nor is it required to be. A summary of the economic impact study can be found in the EIA Appendix H - Socio-Economic Study. The full study has been included in Public Consultation Report. Direct economic impacts can be found in the Heads of Agreement located in Appendix I of the EIA.

Sam's	How can Disney "give" us crown land when it's already ours?	As outlined in the EIA Executive Summary, the Project site is a total of 919 acres, including 758 acres purchased by Disney that have been privately owned for decades, and Crown Lands that include Big Pond, White Pond, and multiple land parcels. Disney is donating 193 acres of the privately-owned lands to the people and Government of The Bahamas.
Chris Potter	The "head of the Disney team is a veterinarian with experience in zoological wildlife...why not an ecologist with experience in coral reef ecosystems?	<p>EIA Section 13 – List of Contributors</p> <p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations working in The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans.</p> <p>A list of contributors may be found in Section 13 of the EIA.</p>
Holly	will it be non smoking? birds eat cigarette butts and die	The smoking policy for Lighthouse Point will be determined closer to the start of operations (expected 2024). Currently on Disney Castaway Cay, guests are permitted to smoke in outdoor designated areas where appropriate disposal receptacles are placed throughout the property.

Meryl Salzinger	Where is the proof that driving the piles for your pier will not have a negative impact on sea life and coral? It is not in the EIA	<p>EIA Section 6.2 Impacts to Marine Resources; Section 6.2.1.6 Construction Noise Impacts; Section 6.2.1.8. 1 Noise Level Avoidance During Construction</p> <p>To minimize impacts to benthic habitats, Disney has intentionally avoided an open channel/land side berth design. The cruise ship pier, berth and service ramp will be constructed as pile supported structures and have been sited at locations and engineered such that no dredging or filling of the sea floor is required. Together with a small-boat marina with floating docks and a protective revetment, the over-water footprint of all marine facilities will be approximately 5.04 acres, mostly over sand and hardbottom. These impacts were factored into the overall impact calculations for habitats and notable marine resources which include the entire infrastructure footprint.</p> <p>A detailed analysis of benthic resources including corals within the footprint of the marine facilities has been completed in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Based on final Project plans, Disney will develop a relocation plan to move corals of listed species (i.e., species designated by the IUCN as Critically Endangered or Endangered) and adult reef-building coral colonies <math>\geq 10</math> cm in size that are good candidates for relocation to similar, to matched habitat in the Lighthouse Point vicinity.</p> <p>A longer-term coral rehabilitation program will be part of the overall mitigation plan for impacted hardbottom habitats. It is proposed that rehabilitation efforts be focused on enhancing coral populations on degraded reefs, building on Disney's existing efforts at Castaway Cay, which includes using coral nurseries to rehabilitate elkhorn and staghorn corals. Disney has substantial experience working with corals and reef systems in The Bahamas, having successfully transplanted approximately 1,800 coral colonies, with more than 90 percent survival rates on the main reef that is being rehabilitated. Disney teams are part of the greater Reef Rescue Project by Perry Institute for Marine Science and have been rehabilitating patch reefs in Southern Abaco for the past 13 years as a dedicated coral conservation project and were the first to start coral nurseries in The Bahamas. Disney is also a key partner in the AZA-Florida Reef Tract Rescue Project, addressing Stony Coral Tissue Loss Disease (SCTLD) off the Florida coast and across the Caribbean. The disease has recently been observed off Grand Bahama and New Providence.</p>
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Construction noise impacts are addressed in the EIA Section 6.2.1.6 – CONSTRUCTION NOISE IMPACTS and EIA Section 6.2.1.8.1 – NOISE LEVEL AVOIDANCE DURING CONSTRUCTION. The noise level associated with pile driving varies significantly depending on the equipment utilized, the overall size of the piles, the substrate into which the piles are driven, the force applied, and the distance to the source but we recognize construction noise has the potential to impact marine mammals in the area. To address this during construction, we will work with SMRU Consulting, the world’s leading marine mammal consultancy trained to assess and mitigate any potential impacts to marine mammals due to development, to determine impact zones, soft start construction strategies, and employ visual observation that will be in place to ensure construction noise is halted when marine mammals are in the area.

Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any impacts.

Please note that this will be addressed in detail in the Environmental Management Plan. Completion of the EIA is the first phase in what is a multi-step process. The Environmental Management Plan is the second phase of this process. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceed with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity.

<p>Bianca</p>	<p>What is the plan for disposing of all the trash that will be generated from all these visitors?</p>	<p>Section 3.1.3.6 Solid Waste Generation and Disposal</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p> <ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.</li> <li>• Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.</li> <li>• We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.</li> <li>• Specialized digesters for waste treatment</li> <li>• Air hand dryers</li> <li>• Water bottle fill stations</li> <li>• Modular construction techniques</li> </ul> <p>All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The</p>
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Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.

Rashema  
Ingraham

How has / is Disney actively  
engaging stakeholders,  
including those who may have  
some concerns or  
apprehensions to the project?

#### Section 13 – Meetings

Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations working in The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans.

Additionally, Disney has held information sessions and met with hundreds of potential employees, vendors, tour operators, community members and others over the past two years to provide project updates, further build relationships and maximize opportunities for Eleuthera and the greater Bahamas and will continue to do so.

A list of meetings is included in the EIA Section 13.

Marjie Findlay	What is public access to the actual point of LHP?	<p>Executive Summary - Public Access and Cultural Resources</p> <p>Disney has committed to provide all citizens and residents of The Bahamas with full access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. Approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands, which Disney will donate to the people and Government of The Bahamas. To help with accessibility, Disney has committed to construct a roadway through the Disney Donated Public Lands.</p>
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Chris Potter	<p>The EIP also reviews some impacts on coral reefs but does not acknowledge that coral reefs are already an ecosystem under extreme environmental stress due to warming climate. How would this stress be exacerbated by the current construction and public use of this area?</p>	<p>EIA Section 4.2.2 – Marine Resources; Section 4.2.2.2 – Condition of Lighthouse Point Marine Communities; Section 7.2.1 – Corals; Section 7.2 Marine Resources</p> <p>Baseline data and impacts for the project are well documented in the EIA. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.</p> <p>The report that proposed a new Marine Protected Area in South Eleuthera points out that the reef near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point, we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
Sam’s	<p>If your project is so amazing why haven’t you used LEED design?</p>	<p>One of Disney’s guiding principles for development at Lighthouse Point is to develop the site in an environmentally responsible way and all buildings will be designed with highest efficiency in mind. Most of the buildings planned for Lighthouse Point guest areas are open air which will promote sustainability by relying on natural lighting and air circulation. A number of back of house facilities will be more traditional structures that utilize air conditioning and artificial light and Disney will explore these buildings for possible LEED certification.</p>

Meryl Salzinger	Are you guaranteeing these jobs for eleutherans?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards.</p>
ArthiaNixon	how many in senior roles please? you are saying Bahamian not Eleutheran	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas, Disney has committed that at least 150 operations jobs will be created and available for Bahamians with a special focus on Eleutherans. Positions will include management positions, the exact number of positions to be finalized as we approach operations, and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards.</p>
Toby Smith	<p>Since Disney already has Castaway Cay: why don't they just keep to that.</p> <p>Why is Disney only just hiring a Bahamian manager of Castaway Cay last month when they have been here for 20 years.</p> <p>Why is the "BEST" Commission giving Disney the opportunity to pitch their project and host this call, why aren't they balancing the debate by allowing Bahamian environmental groups to pitch their concerns for the same amount of time. Can the BEST Commission see why Bahamians see such behavior they favour Disney's project and this is a done deal.</p>	<p>Questions on the process, including the requirements for the public consultation, may be best answered by the Government of The Bahamas; however, in the public meeting held April 8, 2021, the Department of Environmental Planning and Protection (DEPP) made clear that DEPP was in control of the meeting, with Disney there as a participant to provide details on the proposed development. A full copy of the transcript from the April 8 public meeting is available at: <a href="https://lighthousepointbahamas.com/">https://lighthousepointbahamas.com/</a> and will also be part of the final EIA comment report.</p> <p>Regarding staffing at Castaway Cay, this question is not related to the EIA; however, Disney Cruise Line has always had a significant number of job opportunities for Bahamians available at Castaway Cay. A pause in operations due to the pandemic has given Disney a chance to expand on these efforts and commit to fill all positions with Bahamians. Through this effort, Disney Cruise Line is recruiting Bahamians to fill several positions, including management roles, in a range of disciplines, and with opportunities for training and advancement.</p>

Rashema  
Ingraham

Culture is a part of the Bahamian "environment" so other than saying the word "culture" what are some of the key cultural elements that Disney has included in its EIA to preserve them and to use the local and national Bahamian talents - helping to develop their careers, giving proper royalty rates and compensation for work produced?

#### Executive Summary - Socio-Economic Influences

Regarding economic impact, an economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report will be published in the Public Consultation Report on the project website.

Direct economic impacts are outlined in Disney's Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products

The design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artist from Eleuthera and Antonius Roberts, a master artist from Nassau, are anchoring Disney's efforts as we work with local artists, historians and creatives in The Bahamas.

Chris Potter

How will you be monitoring the effect of the drastic increase in public use of these habitats as well as public damage to inshore reefs due to "snorkeling" and other activities.

#### EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (approximately 1,600 to 2,900 per day). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.

<p>Doonie Brewer</p>	<p>I echo a previous question - why is there even a NEED for another stopover site for Disney ships? Why isn't Castaway Cay enough? Also, the artistic renderings include (what looks like) a river. What sort of blasting and/or excavation will that project necessitate? And to what level of impact on the wetlands/salt ponds back there?</p>	<p>EIA Executive Summary</p> <p>Disney Cruise Line will be adding three new cruise ships to its fleet by 2025 and intends to increase the number of ship calls in The Bahamas.</p> <p>Additionally, the artistic renderings referenced are conceptual images only. Bodies of water seen in the conceptual image are intended to reflect ocean or naturally occurring salt ponds that exist on the property today. Disney's proposed development requires no dredging and blasting or excavation for the purpose of creating new bodies of water on the site.</p> <p>No dredging or filling is proposed for the inland salt ponds. Variable-width buffers will be enforced around the salt ponds and the only activities proposed to be undertaken within the buffers are upgrades to the existing road, in line with Disney's Heads of Agreement with the Government of The Bahamas, and the development of a nature trail in the vicinity of Big Pond (EIA Figure 6-1). We will have a plan in place as part of the Environmental Management Plan to ensure ongoing monitoring that will allow us to adjust our strategies should any impacts be seen.</p> <p>We have adjusted the design plans based on findings from our field investigations to avoid sensitive areas like the ponds and islands south of the property. We also moved the development footprint to avoid an area with the lone wetland in the NW corner of the site. Any construction and operations throughout the life of the project will comply with effective sediment and erosion controls. Best Management Practices (BMPs), including site-specific controls and turbidity management measures will be followed to minimize impacts to water quality in the pier and berth areas and a turbidity management plan will be part of the Environmental Management Plan. BMPs will be employed during land clearing activities to limit impacts and reduce the potential for sediment transport during storm events, with a focus on avoiding impacts to subsurface voids, ponds, wetlands, and the marine environment, and additional information on this can be found in the EIA Section 3.1.3.8.</p>
<p>Tod Hagan</p>	<p>Please, which third party organizations peer reviewed the environmental impact study and who funded them?</p>	<p>The Department of Environmental Planning and Protection did not complete a third-party review of the EIA; however DEPP has specified a third-party review will be conducted for the construction Environmental Management Plan upon submittal.</p>

Sam's

What about the impact to surrounding reefs?

EIA Section 4.2.2 – Marine Resources and Section 7.2.1 – Corals

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Underwater habitat maps were constructed utilizing both geomorphic and biotic information to define standardized habitat classes (Coastal and Marine Ecological Classification Standard (CMECS); Mumby and Harbourn, 1999).

The project footprint encompasses mainly algal dominated hardbottom coral communities that are growing on ancient limestone bedrock and characterized by low coral densities with coral cover that rarely exceeds 2-3% of the bottom. True coral reefs are built on their own recently deposited dead coral skeletons, have high coral density with live coral cover often in excess of 20% of the bottom. True coral reefs occur throughout the LHP area but not within the Project footprint.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor but will still cause some impacts to the seafloor associated with placement of structures (concrete piers, limestone revetment). A detailed analysis of benthic resources including corals within the footprint of the marine facilities was undertaken in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Detailed benthic surveys using transects placed within the proposed development footprint quantified the species, density, and size of corals and other sessile invertebrates within the impact areas. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in "fair" condition based on AGRRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations.

		<p>Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p> <p>Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
Danielle C. Gibson	where can one find the completed document?	The EIA can be found at: <a href="https://lighthousepointbahamas.com/">https://lighthousepointbahamas.com/</a> .

michael  
stevenson

What about the carbon foot  
print?

EIA Section 6.4 - Impacts of Project on Climate Change; Section 6.4.2.1 Efforts to Reduce Carbon Emissions Via the Lighthouse Point Project

Initial emissions estimates were completed before the design of the Project was complete. These initial estimates include emissions associated with the direct combustion of fossil fuels for heating, cooking, electricity, waste incineration, and transportation, as well as those associated with the use of refrigerants. The initial estimates of 3,100 metric tons CO<sub>2</sub> per year were based on achieving the minimum requirements from the Heads of Agreement for 30% renewable energy as well as our past operational environmental data.

The current design of the project aims to use renewable energy to meet 90% of electricity needs, utilizing onsite solar panels and batteries, which will further reduce operational emissions. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time.

Sam's	What about the cumulative impact of 3 cruise ports within 20 miles of one another? EIA doesn't mention that in their draft EIA	<p>EIA Executive Summary; Section 4.2 – Biological Resources; Section 6.4 - Impacts of Project on Climate Change; Section 6.4.2.1 Efforts to Reduce Carbon Emissions; Section 4.1.8 - Sea Level Rise and Resiliency</p> <p>This is outside the scope of the EIA.</p> <p>Disney can only speak to its proposed plan for development which strives to develop the site in an environmentally responsible way, create economic opportunities for Bahamians, celebrate Bahamian culture and further strengthen the community.</p>
Heather Stanford	is Dr Mark a marine biologist?	<p>Section 13 - List of Contributors</p> <p>Dr. Mark Penning is Disney's Vice President, Disney Animals, Science and Environment. He leads a team, of more than 1,000 professionals who passionately oversee animal programs, environmental initiatives and field conservation programs for Disney around the world. He has spent his veterinary career of more than 25 years caring for wildlife and wild places and has previously served in roles such as CEO of the South African Association for Marine Biological Research, which is dedicated to marine research and conservation, as well as president of the World Association of Zoos and Aquariums. His team works closely with the Disney Conservation Fund, which has awarded more than \$100 million in grants to conservation programs around the world including in The Bahamas. Several of the experts on his team have been engaged in significant work in The Bahamas in partnership with local organizations and scientists for more than a decade.</p> <p>A full list of contributors to the EIA is available in Section 13 of the EIA.</p>
Rashema Ingraham	Can Penning refer to a map that pins the zone he's talking about?	<p>It is unclear what map was being referenced but a number of site plans, maps and figures may be found in the EIA including:</p> <ul style="list-style-type: none"> <li>• An illustrative concept plan – Figure 6-1.</li> <li>• An overview of vegetative communities – Figure 4-19.</li> <li>• Notable landside features – Figure 4-20.</li> <li>• An overview of marine benthic habitats – Figure 4-24.</li> <li>• A visual map of marine transects and fixed monitoring sites – Figure 4-26.</li> </ul>

Annie Muggia

Do you seriously think that the surrounding reefs will not be affected? I am confused by the “science’ behind this...

EIA Section 4.2.2 – Marine Resources; Section 6.2.1.1 - Direct Impacts to Notable Marine Resources, 6.2.1.5.4 - Direct and Indirect Impacts to Patch Reefs; 6.2.1.5.10 - Direct and Indirect Impacts Fore Reefs; 6.2.1.5.11 - Direct and Indirect Impacts to Coral Wall Transitions; Section 7.2.1 – Corals

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years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

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<p>Sam's</p>	<p>What about the impact of 1 million people with suntan lotion which is a know killer of reefs?</p>	<p>Section 6.2.1.5.4 Direct and Indirect Impacts to Patch Reefs</p> <p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.</p>
<p>Sam's</p>	<p>What about the impacts of sewage treatment plant?</p>	<p>Section 3.1.3.3 - Wastewater Collection, Treatment and Disposal</p> <p>Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in</p>

		<p>proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored. Additional information will be provided in the Environmental Management Plan, the second phase of this process as outlined in Bahamian laws and regulations.</p>
<p>Alanna alannawaldman@gmail.com</p>	<p>How will sewage and sewage treatment be handled? Nutrient run off can have severe impact on nearshore environments</p>	<p>Section 3.1.3.3 - Wastewater Collection, Treatment and Disposal</p> <p>Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored. Additional information will be provided in the Environmental Management Plan, the second phase of this process as outlined in Bahamian laws and regulations.</p>
<p>Kelly Arkles</p>	<p>With the number of cruise guests, how successful do you feel just “signage” will be to avoiding cruise patron carbon footprints in regards to sunscreen, trash and “other environmental conservation messages”? What enforcement of these measures is Disney prepared to take?</p>	<p>Executive Summary</p> <p>Disney is committed to creating a creating multi-faced programs to educate employees, vendors and guests about the role they must play in protecting the environment at Lighthouse Point. This will include not only on-island interpretative signage and environmental conservation messaging, which have already proven to be successful at Disney Castaway Cay, but will also include environmental education programs for employees and visitors.</p> <p>Guests will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point.</p> <p>We recognize the importance of monitoring the environment and will continue to survey and use</p>

adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. Disney is also monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.

Dinah2

Why doesn't the EIA include the alternatives Disney identified + other alternative that were identified and submitted for consideration? Alternatives are the heart of EIA. This document isn't truly an EIA document.

#### Section 2.4 Site Alternatives

Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.

Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.

The report that proposed a new Marine Protected Area in South Eleuthera points out that reefs near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point, we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that would result from the project and development. This includes the creation of at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, and ongoing training and

professional development programs Disney has already committed to that are designed to build capacity and maximize opportunities for Bahamians.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

In keeping with the environmental due diligence, DCL has continued to evolve the project's design. For example, surveys identified a number of protected trees and some cultural ruins in the northwest area of the property. As a result, the structures originally planned for that area have been relocated to the eastern side of the property. Additionally, when bird surveys identified a small wintering population of endangered piping plovers at a location along the southern shore of the property, the design was adjusted to avoid that area. Likewise, it was determined that the pier could be narrowed, reducing the potential impact on the marine environment by approximately 25 percent.

ArthiaNixon	<p>what do you mean manage turtle nesting AND a resort?          Are you seriously thinking marine life is safe from tourist selfies if they survive?</p>	<p>The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 MARINE REPTILES. Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. No sea turtle nesting activity has been observed to date. That being said, Disney has more than 15 years managing nesting sea turtles at Disney’s Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting activity in the world. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney’s Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <a href="https://myfwc.com/license/wildlife/marine-turtle-permit/">https://myfwc.com/license/wildlife/marine-turtle-permit/</a>. If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.</p>
Jules Holland	<p>What are you doing to help recognize/mitigate the bias that Disney developers have on this project? Obviously there are financial incentives that Disney has and they are overriding any ethical problems they encounter.</p>	<p>EIA Section 13 – List of Contributors</p> <p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company’s deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity at a species level – with the appropriate environmental management plan in place.</p>
Alison Salzinger	<p>So why show palm trees in your model? They are non-native</p>	<p>EIA Executive Summary</p> <p>The models referenced at Lighthouse Point are creative images that are conceptual in design. Disney has committed to a conscientious effort to remove and/or control some invasive non-native species that are listed in The Bahamas National Invasive Species Strategy that will be</p>

		<p>complemented by a landscaping program that uses a palette of native trees and shrubs that will encourage visits by native fauna.</p>
<p>Rashema Ingraham</p>	<p>will Disney need a research permit for the sea turtle work?</p>	<p>Section 7.2.3 - Sea Turtles</p> <p>The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 MARINE REPTILES. Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. No sea turtle nesting activity has been observed to date. That being said, Disney has more than 15 years managing nesting sea turtles at Disney's Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting activity in the world. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney's Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <a href="https://myfwc.com/license/wildlife/marine-turtle-permit/">https://myfwc.com/license/wildlife/marine-turtle-permit/</a>. If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.</p> <p>Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney's Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <a href="https://myfwc.com/license/wildlife/marine-turtle-permit/">https://myfwc.com/license/wildlife/marine-turtle-permit/</a>.</p> <p>All work related to this will follow the laws and regulations of The Bahamas.</p>
<p>Kristel Kingston-Anderson</p>	<p>There are coral reefs just 20 feet from the shore on the ocean side, how will you keep little Johnny from standing on the coral, dripping sun block, and saying Look at me mommy! Take a picture? Or are you just hoping to plant statues of mickey and Minnie on the reef once it's dead so</p>	<p>Impacts on corals can be found in Section 7.2 Marine Resources</p> <p>Guests will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point</p>

	<p>the guests have something to look at like your other locations?</p>	<p>and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.</p>
<p>Kelly Arkles</p>	<p>Lighthouse Point has been a formally proposed marine protected area. It is also very feasible that it would meet criteria for being a UNESCO World Heritage site. Why would Disney choose to disrupt and alter this magnificent area for the sake of a cruise ship port when there are other areas that could used and rehabilitated? Why wouldn't Disney want it protected and accessible to all? Why was this not protected as part of the Caribbean Challenge Initiative which the Bahamian government committed to and did not achieve its</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity at a species level – with the appropriate environmental management plan in place.</p> <p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p>

	<p>committed 20% of marine protected land by 2020?</p>	<p>Disney has demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
<p>Meryl Salzinger</p>	<p>Why won’t Disney consider making this a beautiful natural park that would attract the kind of tourism that Eleuthera is already know for? And that would lead tourists through the neighboring towns to local businesses? It would also support Disney’s claim that they are an environmental cruise company.</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company’s deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity at a species level – with the appropriate environmental management plan in place.</p> <p>Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and trainings, and a portion of the funding provided by Disney will be used for small business grants across a variety of businesses.</p>

<p>casuarinamckinney</p>	<p>The “Bridge” between Lighthouse Point and Cat Island contains critical habitat for commercially important fish species and negative impacts on fisheries from construction and operation have not been adequately addressed in the EIA. We have yet to see the Environmental Management Plan. Is this available to the public?</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business and have held ourselves to the same high standards at Lighthouse Point that we would for any project, anywhere in the world. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.</p> <p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.</p> <p>While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish &amp; Tarpon Trust to further research this starting this fall.</p> <p>The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don’t anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.</p> <p>We do not anticipate that juvenile <i>Albula vulpes</i> bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile <i>A. vulpes</i> in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile <i>A. gorensis</i> use the moderate-energy sandy shorelines, but since <i>A. vulpes</i> represents &gt;99.1% of the recreational</p>
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fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways .If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will

include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

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What is the objective of this proposal? What will it bring to the area other than Disney's economic gain?

#### Executive Summary

The guiding principles of this project are to develop the site in an environmentally responsible way, create sustainable economic opportunities for Bahamians, celebrate Bahamian culture and further strengthen the community.

An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report will be published in the Public Consultation Report on the project website.

Direct economic impacts are outlined in Disney's Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products

Disney has already made progress toward these initiatives. For example:

- Disney has toured construction sites and met with contractors across Eleuthera, engaged with the Bahamian Contractors Association, Society of Engineers and other industry organizations and hosted multiple information sessions in Eleuthera and Nassau to maximize opportunities for Bahamian contractors, and this work will continue.

- Disney has held information sessions and met with hundreds of potential employees, vendors, tour operators and others over the past year to further build relationships and maximize opportunities for Eleuthera and the greater Bahamas and will continue to do so. Contracting for opportunities that will be available when the site is operational generally begins 12 to 18 months prior to the start of onsite operations.
- The design for Lighthouse Point will be inspired by the natural environment and rooted in the culture of Eleuthera and The Bahamas more broadly. Disney Cruise Line is working with the local creative community, led by master artists Kevin Cooper and Antonius Roberts, to achieve this.
- In addition to its ongoing community engagement in The Bahamas, Disney has begun supporting the community in Eleuthera, providing funding for holiday events, cultural activities, an after-school program, college visits to Florida by high school students from Eleuthera and more. Disney has also announced scholarships for four female cadets at LJM Maritime Academy, sponsored and participated in Culinary Week at the University of The Bahamas and made significant contributions to Hurricane Dorian relief and recovery efforts, including a \$1 million donation to non-profit organizations and more than \$500,000 in supplies for impacted communities and direct assistance to Disney's Bahamian employees.
- Disney has entered into an agreement with the Access Accelerator Small Business Development Centre and the Eleuthera Chamber of Commerce, providing more than \$1 million (over three years) to fund a new Eleuthera Business Center and provide business development advisory services, business communication training, customer service training, business mentorship and other programming, as well as grants, designed to prepare startups and small businesses for participation in development projects underway on Eleuthera, including Lighthouse Point.
- Disney is committed to working with the Government of The Bahamas, the local community and educational institutions to develop training and professional development programs for residents of Eleuthera and the greater Bahamas interested in working at Lighthouse Point. Disney has met with the Ministry of Labour, University of The Bahamas, National Training Agency, Bahamas Technical and Vocational Institute and others to begin developing important relationships.
- Disney will provide all citizens and residents of The Bahamas with full access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. Approximately 190 acres of upland and the

southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands. The Developer will construct a roadway through the Disney Donated Public Lands, a parking lot, and beach amenities including restrooms.

Matt	<p>The protected trees list was expanded to over 130 species last month I believe. much more added than the lignum vitae, madeira etc that was highlighted as protected. Please advise if the newly added species with be considered.</p>	<p>Disney is aware that since the EIA was submitted to Government, Forestry (Declaration of Protected Trees) Order legislation has passed that expanded the list of protected tree species in The Bahamas. Disney has reviewed site transects and box plots to determine the species found in each habitat. The new list was added to the EIA as an addendum prior to final submission to the Department of Environmental Planning and Protection, and any necessary management and mitigation will be outlined in the Environmental Management Plan.</p>
Meryl Salzinger	<p>Yes has Disney considered the number of people who have signed the petition against this project?</p>	<p>We acknowledge the significant interest in the project, which was one of several reasons we took three years to ensure the development of a comprehensive EIA based on facts. We have spoken with thousands of people in Eleuthera, the greater Bahamas and beyond, as well as scientists and conservationists, over the past three years and the project has significant support among those who have taken the time to review the facts and provide feedback.</p>
Bianca	<p>The EIA mentions an incinerator for trash. What about the air pollution risk from that</p>	<p>EIA Section 3.1.3.6 - Solid Waste Generation and Disposal and Section 6.4.2 - Reducing Emissions</p> <p>Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.</p>
Dinah2	<p>Why isn't the full economic study available to the public?</p>	<p>The full economic impact study will be included in the Public Consultation Report.</p> <p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report will be published in the Public Consultation Report on the project website.</p> <p>Direct economic impacts are outlined in Disney's Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The</p>

		<p>Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products</li> </ul>
Rashema Ingraham	where can we find the study?	The full economic impact study will be included in the Public Consultation Report.
Marjie Findlay	Why not release the economic study then?	The full economic impact study will be included in the Public Consultation Report.
Kris Walker	How are the structures going to be stabilized and protected? Just saying nothing will happen to them is enough.	<p>EIA Section 4.1.8 (Sea Level Rise SLR) and Resiliency</p> <p>The project plans will be formulated to account for future impacts from climate change, including sea level rise (SLR). Using guidelines established by the U.S. Federal Emergency Management Agency’s (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave height for the 50-, 100- and 500-year return periods, plus long-range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p>

<p>Kelly Arkles</p>	<p>Why haven't they engaged the environmental groups that are NOT in Disney's pockets for input?</p>	<p>EIA Section 13 – List of Contributors</p> <p>We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.</p> <p>Over the past few years, we have responded to numerous letters from the organizations you referenced. We have taken relevant feedback into consideration as we developed our EIA. In February 2020, we met with a senior advisor to the group and reviewed our plans in detail. As well, we shared a link to the EIA with the groups on the day it was posted on our website, March 10, 2021, and offered to discuss it further with them after they had time to review it. We did not receive a response to that offer.</p> <p>We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.</p> <p>A list of organizations engaged is available in the EIA Section 13 – List of Contributors.</p>
<p>Sam's</p>	<p>Why didn't Disney meet with us?</p>	<p>It is unclear who "us" is.</p> <p>We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place</p>

		<p>Over the past few years, we have responded to numerous letters from the organizations we believe you are referencing. We have taken relevant feedback into consideration as we developed our EIA. In February 2020, we met with a senior advisor to the group and reviewed our plans in detail. As well, we shared a link to the EIA with the groups on the day it was posted on our website, March 10, 2021, and offered to discuss it further with them after they had time to review it. We did not receive a response to that offer.</p> <p>We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.</p>
Chris Joyce	so if the Bahamas is going to make 32 Mil per year for 25 years how much is disney going to make off this sacred place?	<p>EIA Executive Summary and Appendix H – Socio-Economic Study</p> <p>Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.</p> <p>The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices. <ul style="list-style-type: none"> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> </ul> </li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the</li> </ul>

		<p>need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</p> <ul style="list-style-type: none"> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
Meryl Salzinger	Yes how can Disney guarantee that the amount of jobs they are saying are going to Bahamians will actually go to them	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas Disney has committed, and is contractually obligated, to:</p> <ul style="list-style-type: none"> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits to be made available for all Bahamians. Positions will include management roles and cover a range of disciplines and with opportunities for advancement.</li> </ul>
Matt	The protected trees list was expanded to over 130 species last month I believe. much more added than the lignum vitae, madeira etc that was highlighted as protected. Please advise if the newly added species will be considered.	Disney is aware that since the EIA was submitted to Government, Forestry (Declaration of Protected Trees) Order legislation has passed that expanded the list of protected tree species in The Bahamas. Disney has reviewed site transects and box plots to determine the species found in each habitat. The new list was added to the EIA as an addendum prior to final submission to the Department of Environmental Planning and Protection, and any necessary management and mitigation will be outlined in the Environmental Management Plan.
Tod Hagan	Are all the consultants funded by Disney?	Yes, we have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding

		<p>commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.</p>
Matt	<p>would like to know more about pier construction and mandates that the turning basin for ships be offshore in over 80ft of water</p>	<p>EIA Section 3.1.4.3 – Boat and Vessel Traffic; Section 3.1.2.1 Navigation Channels/Basins</p> <p>The depth of 80 ft refers to the depth a sub-surface feature locally referred to as “the Bridge” that extends between the tip of South Eleuthera and Little San Salvador and will be used to access the site. The depth to the top of the Bridge has been charted to be no shallower than 80 ft of depth, which is well below the draft of ships operating in the area (approximately 27 ft.).</p> <p>As part of its proposed development, Disney has committed to no dredging and the construction of an open-trestle pier will support this objective. The pier will extend to water of 35 ft. depth, which is sufficient depth for the ship berth. The method for the berthing basin construction will be addressed in the Environmental Management Plan, which is the second in a two-step process as outlined in Bahamian laws and regulations.</p>
Edgar Seligman	<p>Why did Disney disrupt the meeting held by One Eleuthera &amp; The Bahamas National Trust in Tarpum Bay? Why didn't Disney want Bahamians to hear about that plan? Sadly, you lost all credibility with democratically minded Bahamians when you did that.</p>	<p>This question is not related to the Environmental Impact Assessment; however, no representatives of Disney attended the referenced meeting.</p>
Edgar Seligman	<p>The design is rooted in Bahamian culture? Really? Looks like Polynesia, not The Bahamas...</p>	<p>The design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artist from</p>

Rebekkah	are they locals or from other family islands?	Eleuthera and Antonius Roberts, a master artist from Nassau, are anchoring Disney's efforts as they work with local artists, historians and creatives in The Bahamas.
Azaleta Ishmael-Newry	If this project goes through - What type of insurance will be needed by the Bahamian persons who want to provide tours? Eleuthera is a depressed economy. Insurance premiums in The Bahamas are usually unreachable for many small businesses. Thank you	Tour providers will be required to meet requirements that include carrying insurance. Contracting with tour providers generally begins 18-24 months prior to the start of operations. We have already met with numerous potential tour providers and are working with organizations like the Access Accelerator/Small Business Development Centre to help businesses prepare for these opportunities. The Small Business Development Centre recently announced it is working on group policies for more affordable liability insurance and we encourage tour operators to seek more information on this.
Holly	so they will select a contractor in May so this is a done deal. Someone should ask that. Will it be an Eleutheran?	<p>EIA Executive Summary</p> <p>The project at Lighthouse Point will be contracted as a Design Build which means an overall contractor will be responsible for both the design and construction of the project. The Design Builder was in part selected based on their plans for employing Bahamians and doing business with Bahamian subcontractors. Disney's Heads of Agreement with The Bahamas requires at least 120 construction jobs with an overall ration of 80% Bahamians over the life of construction.</p> <p>Additionally, Disney has toured construction sites and met with contractors across Eleuthera, met with and joined the Bahamian Contractors Association, met with the Society of Engineers and other industry organizations and hosted multiple information sessions in Eleuthera and Nassau to maximize opportunities for Bahamian contractors, and this work will continue.</p> <p>The Design Builder was also selected in part based on their ability to implement sustainable building practices.</p>

Holly	150 job for Bahamians? Eleutherans?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government Disney has committed that at least 150 operations jobs will be created for Bahamians with a focus on recruiting from Eleuthera. Positions will include opportunities for training and development and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards, as well as management positions.</p>
ArthiaNixon	that's my question Holly. how can we guarantee Eleutherans?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government Disney has committed that at least 150 operations jobs will be created for Bahamians, with a recruitment focus on Eleuthera. Positions will include opportunities for training and development and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards, as well as management positions.</p>
Sam's	Why is Disney building I. A proposed marine protected area?	<p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p> <p>Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>

Tyson J Demosthene	who hiring in south eleuthera I need a job .	This question is not related to the EIA; however Disney Cruise Line has already hosted information sessions in Eleuthera for potential employees and will continue to do so. Construction roles will be available closer to when permission is given for site work to start. The bulk of hiring for operational roles at Lighthouse Point is expected to occur 18-24 months prior to the start of operations. Those interested in roles currently available with Disney Cruise Line – including those at Castaway Cay in The Bahamas – can visit <a href="http://www.dcljobs.com">www.dcljobs.com</a> .
Tod Hagan	How can we have a valid impact study if the design is incomplete?	The Bahamas employs a two-step process to determine whether a Project is granted environmental clearance. The Environmental Impact Assessment is meant to identify environmental conditions at the site, outline potential impacts and provide high-level information regarding potential mitigation of those impacts. The Environmental Management Plan – which is the second phase of the process – requires more specific information about how the project will be managed from a technical and Best Management Practices standpoint. The EMP is submitted following completion of the EIA.
Robin Carson	From Shawn Neely, employee at Castaway Cay up until 2018, when, at that time Disney claimed that they had a high percentage of Bahamian employment, claimed that there were 55-60 Bahamian employees. Perhaps it's changed some, but I'm struggling to believe that it is or going to be soon 100% Bahamian. In addition, why wouldn't Disney have planned to employ Bahamians all along, why just now? Sounds as if it's damage repair.	This question is not related to the EIA; however, Disney Cruise Line has always had a significant number of job opportunities for Bahamians available at Castaway Cay. A pause in operations due to the pandemic has given Disney a chance to expand on these efforts and commit to fill all positions with Bahamians, particularly given the current unemployment rate. Through this effort Disney Cruise Line is recruiting Bahamians to fill several positions, including management roles, in a range of disciplines, and with opportunities for training and advancement.

<p>Kristel Kingston-Anderson</p>	<p>You just said "currents are greater" so is there not a concern with the ship's thrusters washing sand over the reefs in this area?</p>	<p>Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA), coral reefs do not appear within the development footprint at Lighthouse Point. Including 75-foot buffers on both sides of the pier, 0.145 acres of individual corals could be potentially impacted. These corals will be translocated in coordination with Government of The Bahamas.</p> <p>The open-trestle pier berth design places the ship in waters approximately 35 ft natural depth and the majority of the sea floor below is hard bottom with a very thin layer of coarse sand over rock. This depth places the ship's propellers/thrusters propwash more than 20 feet above the sea floor. This depth and the horizontal direction of the propwash greatly limits if not eliminates any turbidity issues or disturbance of the sea floor by the wash. Even if the propwash would contact the sea floor, the sand surveyed beneath the berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions.</p> <p>Moreover, Disney anticipates only minimal accumulation of fine sediments to the seafloor in the ship berthing area during the construction phase of the Project as there will be no dredging. While the expectation of turbidity related impacts to reefs are unlikely, turbidity and sedimentation will be monitored with protocols to prevent or minimize any issues during construction and operation. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.</p>
<p>Meryl Salzinger</p>	<p>When you drill in piles how do you think that it will not affect coral that is not in the footprint of the pier? And if you find small coral cover you should be helping to make them healthier not give them up for dead</p>	<p>EIA Section 6.2 Impacts to Marine Resources</p> <p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Underwater habitat maps were constructed utilizing both geomorphic and biotic information to define standardized habitat classes (Coastal and Marine Ecological Classification Standard (CMECS); Mumby and Harbourn, 1999).</p> <p>The project footprint encompasses mainly algal dominated hardbottom coral communities that are growing on ancient limestone bedrock and characterized by low coral densities with coral cover that rarely exceeds 2-3% of the bottom. True coral reefs are built on their own recently deposited</p>

		<p>dead coral skeletons, have high coral density with live coral cover often in excess of 20% of the bottom. True coral reefs occur throughout the LHP area but not within the Project footprint.</p> <p>Disney’s planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor but will still cause some impacts to the seafloor associated with placement of structures (concrete piers, limestone revetment). A detailed analysis of benthic resources including corals within the footprint of the marine facilities was undertaken in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Detailed benthic surveys using transects placed within the proposed development footprint quantified the species, density, and size of corals and other sessile invertebrates within the impact areas. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.</p> <p>Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney’s success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p> <p>Additional information can be found in the EIA Section 4.2.2 – MARINE RESOURCES and Section 7.2.1 – CORALS</p>
ah	<p>10% is a horrible statistic .... Why not work to protect what is there and then helping to rehabilitate them</p>	<p>It is unclear what this is referring to. If this is referring to coral, the answer to the previous question addresses this.</p>

Edgar Seligman	<p>A point has been made that nothing like this would ever be allowed in a place as pristine and magnificent as the Grand Canyon... so why are Disney doing this? Please listen and engage with BREEF, Save The Bays, The Waterkeepers Alliance and other conservation groups</p>	<p>We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.</p> <p>Over the past few years, we have responded to numerous letters from the organizations you referenced. We have taken relevant feedback into consideration as we developed our EIA. In February 2020, we met with a senior advisor to the group and reviewed our plans in detail. As well, we shared a link to the EIA with the groups on the day it was posted on our website, March 10, 2021, and offered to discuss it further with them after they had time to review it. We did not receive a response to that offer.</p>
Christo Huntington	<p>This is simply a debate between what matters more: economic development of Bahamas Government + Disney or protecting the environment. What matters more to you? Money or pure nature?</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment (EIA) for Lighthouse Point. We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity – with the appropriate environmental management plan in place.</p> <p>There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.</p>
Beth Hall	<p>Where can the EIA be found please</p>	<p>The EIA for Lighthouse Point can be found at: <a href="https://lighthousepointbahamas.com/">https://lighthousepointbahamas.com/</a>.</p>

<p>Tod Hagan</p>	<p>so the survey was not very comprehensive then</p>	<p>EIA Section 4.2.1 and 4.2.2 and Appendix B and Appendix C</p> <p>It is unclear which survey is being referenced; however, we have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.</p> <p>A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species Lists and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.</p>
<p>Christo Huntington</p>	<p>Why did the report exclude the fish then?!?!?</p>	<p>EIA Section 4.2.2 – Marine Resources; Section 6.2.1.4 - Impacts to Fisheries; Appendix C</p> <p>Disney spent years working with a team of highly qualified and experienced scientists and other professionals from The Bahamas and internationally to complete the comprehensive EIA. Field investigations have spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues.</p> <p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.</p> <p>Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.</p> <p>While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish &amp; Tarpon Trust to further research this starting this fall.</p>

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity

		<p>does not occur there, Disney is working with Bonefish &amp; Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.</p> <p>Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways .If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.</p> <p>As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.</p> <p>A full species lit of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.</p>
Aisha Miller	Likely survey was NOT adequate.. what time period did they do it over?	<p>EIA Section 4.2.1 and 4.2.2</p> <p>It is unclear which survey is being referenced; however, Disney spent three years working with a team of highly qualified and experienced scientists and other professionals from The Bahamas and internationally to complete the comprehensive EIA. Field investigations have spanned 36 months</p>

		<p>in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively.</p> <p>A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species Lists and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.</p>
Dr. Bently Higgs	With at least 150 Bahamians expected to be employed and good benefits mentioned to be included in the employees compensation packages, will the benefits include offerings of shares to employees and/ or possibly the general public?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas Disney has committed to creating economic opportunities for Bahamians including creating at least 150 well-paying operations jobs with benefits for Bahamians in a range of disciplines and with opportunities for advancement. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards.</p>
Bianca	You have a solar power generator array listed as part of the BOH infrastructure, why not invest more in electric vehicles and charging stations?	<p>EIA Section 3.1.3.4 Electric Power and EIA Section 6.3.3.2 Air Resources</p> <p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially. While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources.</p>

Chris Joyce	piping plovers in new York is an automatic stop to work. why arent they being acknowledged.	<p>Section 7.3.1.1 Piping Plovers</p> <p>Piping plovers were sighted at Lighthouse Point during site surveys and are addressed in the EIA Section 7.3.1.1 – Piping Plovers.</p> <p>Piping plovers are known to have a high level of winter-time site fidelity, and a small group (three to eight individuals) of them was sighted during separate site visits in October and December 2017, November and December 2018, and January, October and November 2019, at a location on Bottle Bay Beach. As a result of these findings, Disney has adjusted its development plan to preserve a portion of the point on Bottle Bay where these plovers have been consistently observed to prevent disturbance. The wrack line will not be removed in these areas to help maintain an environment for natural shorebird feeding.</p> <p>Disney will incorporate a piping plover conservation program in the Environmental Management Plan and will also participate in winter piping plover censuses, which are conducted internationally every five years.</p>
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Robin Carson

Do you mean the Bonefish Trust aren't concerned with the turbidity created by both the ship thrusters, the marina, but more importantly, the swimming activity?

#### EIA Section 4.2.2.4 Bonefish and Section 6.2.1.4 Impacts to Fisheries

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

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west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

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Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

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As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom

habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Meryl Salzinger	<p>An alternative plan for Lighthouse point would also bring jobs to South Eleuthera - if you talk to the folks at One Eleuthera you will see that was part of their alternative plan. Why didn't Disney think that an alternative from a local and well respected true community development group in south Eleuthera, like One Eleuthera, was worth considering?</p>	<p>Lighthouse Point has been privately owned for decades and was for sale for several years before being purchased by Disney Cruise Line. There was ample time for other organizations to purchase the land and pursue other development opportunities but none chose to do so. Disney Cruise Line has a signed Heads of Agreement with the Government of The Bahamas for a cruise port at the site.</p> <p>The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.</p> <p>As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.</p>
Aisha Miller	<p>Will those jobs be manager positions?</p>	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government Disney has committed that at least 150 operations jobs will be created and available for Bahamians with a special focus on Eleuthera. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage and recreation/lifeguards.</p>

Kishon Turner	how many foreigners will be working when the project is completed	<p>EIA Executive Summary</p> <p>As part of the Heads of Agreement for Lighthouse Point, Disney has committed to providing at least 150 jobs during the operational phase and expects all jobs to be filled by Bahamians. Roles will be available in a range of disciplines and will include opportunities for training and advancement, as well as management opportunities.</p>
Meryl Salzinger	How much will locals have to pay to sell goods at your site?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas Disney has committed to creating economic opportunities for Bahamians through a number of efforts that include providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more. Requirements for vendors will be finalized as we near operation (expected in 2024) however, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses including retail, creative and handmade goods.</p>

Heather  
Stanford

If Princess Cruises has not provided positive economic outcomes to S Eleuthera what makes you think Disney will???? These people use Disney credit cards. They don't leave the Disney compound.

#### EIA Executive Summary and EIA Section 10 – Conclusion

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Alison Salzinger	Are these jobs for Eleutherans?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government Disney has committed that at least 150 operations jobs will be created and available for all Bahamians, with a recruitment focus on Eleuthera. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards.</p>
x	What% will Disney keep from their vendors?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas, Disney has committed to creating economic opportunities for Bahamians through a number of efforts that include providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more. Requirements for vendors will be finalized as we near operation (expected in 2024) however, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses including retail, creative and handmade goods.</p>
vfvvKristel Kingston-Anderson	So the artisans and others may not be Bahamians? tour operators may not be Bahamian? What is the estimated number of jobs at this site total above and beyond Bahamian?	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government Disney has committed that at least 150 operations jobs will be created and filled by Bahamians at Lighthouse Point. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards.</p> <p>In its Heads of Agreement Disney has also committed to providing opportunities for Bahamian entertainers and priority to Bahamian-owned and -operated tour operators. Requirements for vendors and tour operators will be finalized as we near operation (expected in 2024); however, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare</p>

		<p>businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses.</p>
<p>Meryl Salzinger</p>	<p>Exactly what will locals have to do to be able to sell at your site?</p>	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with the Government of The Bahamas Disney has committed to creating economic opportunities for Bahamians through a number of efforts that include providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more. Requirements for vendors will be finalized as we near operation (expected in 2024). However, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses including retail, creative and handmade goods.</p>

Robin Carson

My question: I want to know exactly how Disney is going to handle both the sewage and the refuse from this sight.

Section 3.1.3 - Infrastructure Descriptions; EIA Section 3.1.3.3 Wastewater Collection, Treatment, and Disposal and Section; 3.1.3.6 Solid Waste Generation and Disposal

Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored. Additional information will be provided in the Environmental Management Plan, the second phase of this process as outlined in Bahamian laws and regulations.

Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.

- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.

<p>Christo Huntington</p>	<p>Why doesn't Disney simply donate to those supporting causes instead of building an environmentally damaging project?</p>	<p>EIA Section 7.9 – The Disney Conservation Fund</p> <p>Disney has a long history of commitment to communities in The Bahamas and to the conservation of natural resources in the region. Since 1995, the Disney Conservation Fund (DCF) has distributed more than \$100 million through grants to support research and conservation projects led by various non-profits and educational institutions worldwide. The DCF has always focused its philanthropy on programs that work alongside communities to find solutions that benefit both people and wildlife with a focus on inspiring the next generation of conservation leaders. Disney has a strong conservation record in The Bahamas, awarding approximately \$4 million in grant funding to more than 20 organizations working in the region since 1997 including Bahamas National Trust, Bahamas Education Culture and Science Foundation, and The Nature Conservancy. While support has directly funded both Bahamian and international conservation organizations, all programs are evaluated on their strategies to support local partners and communities in protecting wildlife and habitat. Many funded international organizations engage local Bahamian organizations in these efforts. Disney is currently supporting a multi-year initiative to reverse the decline of coral reefs across The Bahamas led by the Perry Institute for Marine Science through their Reef Rescue Network. The Reef Rescue Network includes many partners, including 8 Bahamian led-conservation organizations or businesses with the goal to keep adding more. We agree with the importance of community-led conservation and supporting local conservation organizations and local conservationists in this work. Disney has engaged a number of Bahamian biologists, master birders, and environmental scientists in the research and field investigations for the EIA and our effort to engage even more Bahamians and Bahamian-owned organizations and businesses across all aspects of the project will continue throughout development and operation of Lighthouse Point.</p>
<p>Holly</p>	<p>Eleuthera is not the US Getting people ready Have you ever asked when will you be here? 9 am mon and at 11 you are waiting Workforce development</p>	<p>We do not understand the question and therefore cannot answer.</p>

Elizabeth Wallace

Who will be conducting the bonefish tagging study and how will it be monitored to adequately assess usage of the area as a migration corridor? What is the timeframe for this study? The current draft of the EIA does not address this.

#### EIA Section 4.2.2.4 Bonefish and Section 6.2.1.4 Impacts to Fisheries

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the

west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways .If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

A permit application has been submitted to the government by the Bonefish & Tarpon Trust (BTT) to tag and monitor bonefish within the Lighthouse Point development area beginning fall 2021. Disney will continue to leverage any new scientific findings associated with these surveys and is already planning to include fish migration thruways in the marina revetment and structures.

casuarinamckin  
ney

What are the economic benefits for people in Eleuthera from Princess Cays or Little San Salvador (Half Moon Cay)? There are already two other private cruise ports within a few miles of Lighthouse Point that have not delivered on the promised benefits.

#### EIA Executive Summary and EIA Section 10 – Conclusion

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Meryl Salzinger	I'm sorry you can not tell us now about your plans for waste? But you want us to say this is all ok?	<p>Section; 3.1.3.6 Solid Waste Generation and Disposal</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p> <ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019,</li> </ul>

Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.

- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.

Rashema  
Ingraham

With 360 days of sunshine how will Disney use this natural resource to generate energy and move from fossil fuels becoming a completely sustainable zone?

EIA Section 3.1.3.4 Electric Power and EIA Section 6.3.3.2 Air Resources

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.

We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs.

Project initiatives include:

- Solar panels (PV) and batteries sized to cover 90% of the estimated island electricity consumption
- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

The goal of the project is to send zero waste to landfill, first minimizing any waste that comes onto the island in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations. The primary waste generated will be organic waste, which will be treated with a biodigester. Modular construction techniques are also part of the plan.

For water, we are not withdrawing any water, and making water on the island using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. Low-flow water conserving fixtures will also be used in all restrooms

		<p>We will continue to refine the performance of the operation and will install meters throughout the site to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.</p>
Alison Salzinger	incinerating plastic?	<p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p> <ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.</li> <li>• Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.</li> <li>• We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.</li> </ul>

		<ul style="list-style-type: none"> <li>• Specialized digesters for waste treatment</li> <li>• Air hand dryers</li> <li>• Water bottle fill stations</li> <li>• Modular construction techniques</li> </ul> <p>All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.</p>
jessica minnis	Will this place be open only when the ship is in port or open year round?	As stated in the Heads of Agreement, Disney Cruise Line will provide all citizens and residents of The Bahamas with full access to the Property for non-commercial purposes.
Meryl Salzinger	Also what are you going to do about the gallons of suntan lotion coming off the crowds of people you are bringing? that lotion has been shown to kill coral when there is only small amounts.	<p>Section 6.2.1.5.4 Direct and Indirect Impacts to Patch Reefs</p> <p>We have taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.</p>

Edgar Seligman

How is Disney's plan for Lighthouse Point better than One Eleuthera's/BNT's plan? Ms Prunty said Bahamian ownership is important. The One Eleuthera/BNT plan guaranteed that the property would belong to The Bahamas and Bahamians FOREVER. Disney will be gone the minute they start losing money, whether that eventuality comes about by way of a pandemic, a hurricane or other natural disaster

#### EIA Executive Summary and EIA Section 10 – Conclusion

Lighthouse Point has been privately owned for decades and was for sale for several years before being purchased by Disney Cruise Line. There was ample time for other organizations to purchase the land and pursue other development opportunities but none chose to do so. Disney Cruise Line has a signed Heads of Agreement with the Government of The Bahamas for a cruise port at the site.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

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- Developing training and professional development programs to maximize opportunities for Bahamians.

- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
  - Providing priority to Bahamian-owned and -operated tour operators.
  - Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Heather Stanford	via what road??	<p>Figure 3-1 Illustrative Concept Plan Overlay</p> <p>It is not clear which road is being referenced here; however, an illustrative concept plan can be found in the EIA Figure 3-1 that shows the various roads found at Lighthouse Point.</p>
Beth Hall	Will there be new Mega ships as well?	<p>EIA Executive Summary</p> <p>The ships that will call on Lighthouse Point will range in size between 84,000 tons carrying approximately 2,800 passengers and 130,000 tons carrying approximately 3,800 passengers. Only one ship at a time will visit Lighthouse Point.</p>
casuarinamckinney	What about Eleutherans who would like to run tours for stay-over visitors (visitors who contribute much more to the local economy than cruise passengers) to Lighthouse Point? Will they still be able to visit the crown land at the tip of Lighthouse Point? People travel to Eleuthera and stay because they want to visit Lighthouse Point in its pristine condition, and the economic cost of losing this this need to be considered. Has it been considered?	<p>EIA Executive Summary</p> <p>As stated in the Heads of Agreement, Disney Cruise Line will provide all citizens and residents of The Bahamas with full access to the Property for non-commercial purposes. In its Heads of Agreement Disney has also committed to providing priority to Bahamian-owned and -operated tour operators who would like to provide experiences for cruise passengers. Requirements for tour operators will be finalized as we near operation (expected in 2024); however, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses, including tour operators.</p>
eliza	Is Disney going to stop selling Disney Brand reef-unsafe-sunscreen (branded with Frozen etc)	<p>Disney Cruise Line only sells sunscreens that are free from oxybenzone and octinoxate.</p>

Fax Bahr

How do you ensure the sunblock is eco friendly? No way. 1,000 swimmers a day slathered in toxic sunblock - all leaching into those waters - an extraordinary impact to the marine life/ecosystem. Is that in the EIS?

#### Section 6.2.1.5.4 Direct and Indirect Impacts to Patch Reefs

We have taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.

<p>Matt</p>	<p>What mandates will there be to ensure that the ship turning basin will be in water over 100ft deep off the edge? Bow thrusters and stern props kick up huge amounts of sand/silt</p>	<p>3.1.2.1 Navigation Channels/Basins</p> <p>Construction of the open-trestle pier at Lighthouse Point will support the Project objective of no dredging.</p> <p>The open-trestle pier berth design places the ship in waters approximately 35 ft natural depth and the majority of the sea floor below is hard bottom with a very thin layer of coarse sand over rock. This depth places the ship's propellers/thrusters propwash more than 20 feet above the sea floor. This depth and the horizontal direction of the propwash greatly limits if not eliminates any turbidity issues or disturbance of the sea floor by the wash. Even if the propwash would contact the sea floor, the sand surveyed beneath the berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions.</p>
<p>Denny Rankine</p>	<p>Seeing that we are also talking about who should do what in which country, why is most of the flack here is coming from outside of this country</p>	<p>There is no comment or question to address.</p>
<p>Mike Mason</p>	<p>my question - with over a million visitors and attempting to utilize local fish to feed these visitors, what will this do to local fishermen that rely on the population to supply on island restaurants, the fish fry, put food on their own table. What is being put into place to protect the local fishing population in order to preserve fish for the local population?</p>	<p>EIA Executive Summary</p> <p>As stated in its Heads of Agreement with Government, Disney Cruise Line has committed to purchase at least 5% of its agricultural and seafood products from The Bahamas to provide economic opportunities to local farmers and fisherman. This does not mean all items will be sourced from the immediate vicinity of Lighthouse Point. There are no anticipated impacts to local fishermen related to this.</p>

Alison Wellford

data with no bonefish?

#### EIA Section 4.2.2.4 Bonefish

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the

west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways .If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

Annie Muggia

But those facts missed an entire population of bonefish? Doesn't seem very thorough

EIA Section 4.2.2.4 - Bonefish and Section - 6.2.1.4 Impacts to Fisheries

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

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west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

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As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom

		<p>habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.</p> <p>Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.</p> <p>All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.</p>
casuarinamckinney	When will the draft Environmental Management Plan be made public?	Questions on the process may be best answered by The Bahamas Department of Environmental Planning and Protection (DEPP). Their email address is <a href="mailto:inquiries@depp.gov.bs">inquiries@depp.gov.bs</a> . Our understanding is that the Environmental Management Plan is submitted after the Environmental Impact Assessment is accepted by Government.
Heather Stanford	what will it take to STOP DISNEY?	<p>The question is not relevant to the EIA.</p> <p>We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company’s deep and longstanding</p>

		commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.
Alexander Nowatkoski	With construction expected to be 34 months, how will Disney and their respective contractors maintain cleanliness throughout the construction site and eliminate any disturbance to non-developed areas, especially the ocean?	The Environmental Management Plan will include Environmental Compliance Requirements that will outline protocols for a number of items that will ensure cleanliness of the construction site and minimized impacts.
Bianca	Given that Disney has abandoned parks before, what would happen should the same happen to Lighthouse Point? Will we be stuck with a rotting husk or will Disney agree to dismantle what they built?	This premise is inaccurate as Disney has not “abandoned” projects elsewhere.  Disney has had a strong commitment to The Bahamas since the beginning of our cruise business. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay, a cruise destination in Abaco, for more than 20 years. This project represents a significant, long-term investment for Disney Cruise Line. However, a Decommission Plan will be included as part of the Environmental Management Plan required by Government.

<p>Marcie Keever, FoE (she/her)</p>	<p>Marcie Keever from Friends of the Earth US After reviewing the EIA for this project what I would comment is missing from the EIA is the impact of bringing large cruise ships in to this area – specifically, how many cruise ships are planned for the development on a weekly and annual basis? With planned new ships from Disney, what is planned for future years regarding ship dockings? What is also missing is the impact these ships will bring to the water quality and environment of the area – the impacts of cruise ship wastewater and other toxic discharges and the impacts of bringing these large ships into Lighthouse Point and the impacts to water quality and clarity. I will submit a recent study from Florida International University documenting the water clarity improvement in Key West, Florida while cruising has been on hold due to COVID. Thank you.</p>	<p>Executive Summary - Project Need, Site Alternatives, and Description</p> <p>Ship sizes will range between 84,000 tons carrying 2,800 passengers on average, and 130,000 tons carrying 3,800 passengers on average. The estimated weekly volume of passengers ranges from 11,400 to 26,600. Only one ship per day will be able to dock at Lighthouse Point.</p> <p>DCL is consistently recognized as an industry leader. All four DCL ships have the U.S. Coast Guard’s QUALSHIP 21 with Zero-E designation, which recognizes exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating a commitment to environmental stewardship. DCL also wins awards such as Blue Circle Award for voluntary efforts to conserve energy and reduce emissions from Port of Vancouver.</p> <p>Disney Cruise Line follows all laws and regulations of the jurisdictions where we operate. While all Disney ships feature Advanced Wastewater Purification Systems (AWPS) that utilize natural processes to treat and purify onboard wastewater to levels far exceeding international shipping standards, and in some cases shoreside potable water standards, we do not discharge wastewater from vessels while at port. Additionally, Disney ships do not discharge ballast or bilge water in Bahamian waters.</p> <p>Further, Disney Cruise Line doesn’t use scrubbers. As of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel. Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleetwide at all times.</p>
<p>Elizabeth</p>	<p>How many Bahamians are currently employed at Castaway Cay and how many</p>	<p>When operational, Castaway Cay provides an average of 150 opportunities for Bahamians, this includes those who live on Castaway Cay, as well as those who travel from Abaco to provide merchandise, services and port adventures to guests and those who perform work behind the</p>

	<p>of those jobs will disappear if the Lighthouse site is opened. How many artisans and entrepreneurs are currently making a living in association with Castaway Cay.</p>	<p>scenes. Disney has had a strong commitment to The Bahamas since the beginning of our cruise business. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay for more than 20 years. Disney will continue to operate Castaway Cay and the positions held by Bahamians will remain with the opening and operation of Lighthouse Point.</p>
Heather Stanford	<p>Jewel how has Princess benefited S Eleuthera so far?</p>	<p>This question does not appear to be directed at Disney Cruise Line.</p>
Marjie Findlay	<p>If Disney leaves at any time, has the government gotten an agreement that they will leave the site pristine the way they found it?</p>	<p>Disney has had a strong commitment to The Bahamas since the beginning of our cruise business. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay for more than 20 years. This project represents a significant, long-term investment for Disney Cruise Line; however, a Decommission Plan will be included as part of the Environmental Management Plan required by Government.</p>
Anthony Johnson	<p>Will there be any black Bahamians in senior executive management positions? If so, in what capacity</p>	<p>EIA Executive Summary</p> <p>Through its Heads of Agreement with Government, Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include opportunities for training and development and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards, as well as management positions. A black Bahamian currently holds the highest-ranking position at Castaway Cay.</p>
Matt	<p>what fuel will be burnt by ships docked at lhp? diesel or bunker c?</p>	<p>EIA Section 6.3.3.2 – Air Resources</p> <p>All ships in the current DCL fleet burn low sulfur 0.1 percent fuel throughout operations globally, which exceeds the most stringent requirements set in place by the International Maritime Organization requiring all ships to use 0.5% sulfur fuel. Disney has three new ships under construction with delivery planned in 2022, 2024 and 2025. These new vessels will have the potential to burn liquefied natural gas (LNG), one of the best options currently available to the marine industry. LNG yields a more than 20 percent reduction in carbon emissions and an 85-100 percent reduction in other emissions (e.g. sulfur, particulate, nitrogen oxide).</p>

Beth Hall	When will you have another meeting?	The public meeting on the EIA for Lighthouse Point was held April 8, 2021; however, Disney has held information sessions and met with hundreds of potential employees, vendors, tour operators and community members over the past two years to provide project updates, further build relationships and maximize opportunities for Eleuthera and the greater Bahamas and will continue to do so.
Bianca	Did the studies include migratory bird populations?	Section 4.2.1.4.1 - Summary of Bird Observations  To date, observations of bird sightings on the property have been recorded during October, November, and December 2017; November and December 2018; January, April, June, October, November, and December 2019; and January, February, June, July and October 2020. One hundred bird species, which include permanent resident breeding species, migrants and ocean-going species have been observed during these site visits (Table 4-7). Bird surveys were performed by members of the EIA team, which included widely-respected Bahamian bird expert Predensa Moore. Discussions regarding birds also took place with representatives from The Bahamas National Trust (BNT) and the Cape Eleuthera Institute (CEI). Table 4-7 identifies the species observed and pertinent comments (species are listed in accordance with the 2019 List of North American Birds by the American Ornithological Society).
Sam's	So Disney is going to address all these issues?	Disney Cruise Line has addressed all comments and questions received during the Public Consultation period. All responses have been included in the Public Consultation Report, available on the project website.
Alison Salzinger	what is the email for comments	Feedback on the EIA for Lighthouse Point may be sent via e-mail by visiting <a href="http://www.lighthouse.com">http://www.lighthouse.com</a> or e-mailing directly to the Department of Environmental Planning and Protection at: <a href="mailto:inquiries@depp.gov.bs">inquiries@depp.gov.bs</a> . Feedback must be received by May 7, at 5pm to be included in the final EIA Public Consultation Report.
Kristin's iphone	The question on whether Bahamian tour guides/operators would be allowed access to the site with their guests was not answered. The question on what % in dollars Disney will take of vendors/tour operators business was not answered.	EIA Executive Summary  As stated in the Heads of Agreement, Disney Cruise Line will provide all citizens and residents of The Bahamas with full access to the Property for non-commercial purposes. In its Heads of Agreement Disney has also committed to providing priority to Bahamian-owned and -operated tour operators who would like to provide experiences for cruise passengers. Requirements for tour operators will be finalized as we near operation (expected in 2024); however, Disney is currently investing in the community to help entrepreneurs and businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and

		<p>Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and trainings. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses, including tour operators.</p>
Bianca	<p>What is the mitigation plan for spill and leakage for the above ground fuel storage? We do not want a repeat of Grand Bahama.</p>	<p>Section 3.1.3.7 - Fuel Storage</p> <p>Fuel for generators, vessels, vehicles and other ancillary equipment will be stored onsite in a dedicated fuel farm area. All storage systems will be above ground, with sufficient overfill protection and leak detection. A spill control and containment plan (SCCP) will be developed to address any potential accidental spills or discharges.</p>
Elizabeth	<p>I should amend my question to specify How many Bahamians are currently employed with permanent, full-time positions, at Castaway Cay and how many of those jobs will disappear if the Lighthouse site is opened. How many Bahamian artisans and entrepreneurs are currently making engaged in making their living (equivalent to full-time, permanent position) in association with Castaway Cay.</p>	<p>When operational, Castaway Cay provides an average of 150 opportunities for Bahamians, this includes those who live on Castaway Cay, as well as those who travel from Abaco to provide merchandise, services and port adventures to guests and those who perform work behind the scenes. Disney has had a strong commitment to The Bahamas since the beginning of our cruise business. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay for more than 20 years. Disney will continue to operate Castaway Cay and the positions held by Bahamians will remain with the opening and operation of Lighthouse Point.</p>
Kristin's iphone	<p>How can a project be given approval without providing a comprehensive waste management plan? I.e. waste management needs to be a part of the EIA, not an afterthought only addresses in the EMP.</p>	<p>Section 3.1.3.6 Solid Waste Generation and Disposal</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p>

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.

casuarinamckin  
ney

Could you please clarify the steps after the public consultation report is created? For example, this was the report that was created for the proposed South Abaco project:  
<https://www.southabacotyrsozpublicconsultation.com/files%20for%20downlaod/Public%20Consultation%20Report%2002%20Mar%202021%20-%20Final.pdf> but we're not sure about the next steps.

Questions on the process may be best answered by the Government of The Bahamas. That said, the Public Consultation Report will be posted on the project website.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. As you are aware, the environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

**7.0 ATTACHMENT D: QUESTIONS RECEIVED THROUGH LIGHTHOUSE POINT WEBSITE**

## #325032 Lighthouse Beach

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
March 25, 2021 at 6:21 PM	Mail	Peter Matorin <pmatorin@blhny.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Closed	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
153	12	generallhpfeedback@disneycruise.com

**Peter Matorin** March 25, 2021 at 6:21 PM

Gentlemen:

How could you even consider building a resort on Lighthouse Beach? I have been travelling on winter vacations to Eleuthera for the past 15 years and I always drive down to Lighthouse Beach at least twice each trip to enjoy the beauty of this magnificent beach.

It will be totally destroyed by your development. It is totally obscene that you are participating in the destruction of this national treasure.

You should be ashamed to be working on developing this resort – you have sold out your sole.

I do know that if you proceed with your development, I will stop travelling to Eleuthera which will cause an economic loss to the local economy.

I am not alone in my thoughts. I believe that over 350,000 people have signed a petition asking that this project be stopped. If you are allowed to proceed, you will be creating a lot of ill will towards Disney and all its products.

Sincerely yours,

Peter S. Matorin

**Peter S. Matorin, Esq.**  
 Beldock Levine & Hoffman LLP  
 99 Park Avenue, PH 26<sup>th</sup> Floor  
 New York, NY 10016-1601  
 (tel.) 212-490-0400  
 (fax) 212-277-5880  
 email: [PMatorin@blhny.com](mailto:PMatorin@blhny.com)

**Meghann Morris** March 26, 2021 at 3:18 PM

Hello,

We have received your message.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals. We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Thank you

---

**Peter Matorin** March 26, 2021 at 3:24 PM

It is pretty obvious to me that you have never walked on that beach.

Why would you want to destroy a place of such incredible beauty.

It is TOTALLY OBSCENE what Disney Resorts is trying to do. Shame on for supporting this effort. Some things should mean a lot more than adding to a corporate balance sheet.

If this project proceeds, I am all my friends will actively boycott anything Disney. You are not being a good steward of the environment.

Sincerely,

PSM

**Peter S. Matorin, Esq.**  
Beldock Levine & Hoffman LLP  
99 Park Avenue, PH 26<sup>th</sup> Floor  
New York, NY 10016-1601  
(tel.) 212-490-0400  
(fax) 212-277-5880  
email: [PMatorin@blhny.com](mailto:PMatorin@blhny.com)

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Support Software by **Zendesk**

# #325096 Yes

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
March 25, 2021 at 9:38 PM	Mail	Dylan Foyster <dylan.foyster@icloud.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Closed	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
21	21	generallhpfeedback@disneycruise.com

**Dylan Foyster** March 25, 2021 at 9:38 PM

Sent from my iPhone

**Meghann Morris** March 26, 2021 at 3:15 PM

Hello,  
We have received your email, however it appears to be blank. Can you please resubmit at your earliest convenience?

Thank you!

Support Software by **Zendesk**

# #325097 No

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
March 25, 2021 at 9:39 PM	Mail	Dylan Foyster <dylan.foyster@icloud.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Closed	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
15	15	generallhpfeedback@disneycruise.com

**Dylan Foyster** March 25, 2021 at 9:39 PM

Sent from my iPhone

**Meghann Morris** March 26, 2021 at 3:15 PM

Hello,  
We have received your email, however it appears to be blank. Can you please resubmit at your earliest convenience?

Thank you!

Support Software by **Zendesk**

## #329013 Lighthouse Point

**Submitted**                      **Received via**    **Requester**  
 April 6, 2021 at 3:33 PM    Mail                      Shrila Pradhan <shrprad@hotmail.com>

**Status**    **Priority**    **Group**                                      **Assignee**  
 Solved    Normal    DCL Comm - General LHP Feedback    Meghann Morris

**Total time spent (sec)**    **Time spent last update (sec)**    **Original Recipient Address**  
 324                                      324                                      generallhpfeedback@disneycruise.com

**Shrila Pradhan** April 6, 2021 at 3:33 PM

Building a pier on top of the coral will unquestionably destroy it. As you know, coral reefs take hundreds of years to grow and cannot be recreated, once destroyed. Bringing massive, loud vessels to the area will also disturb and destroy the marine life.

Since a cruise ship dock already exists in Eleuthera, why not use it? Disney could build the road and infrastructure to bring people to Lighthouse Point by land. If the trip takes too long for a day visit, Disney could create a land-based resort where people could stay longer. Children could snorkel and learn about marine life in theme park managed "adventures." If Disney truly wants to show corporate responsibility, it can give up the idea to build structures on the water and protect the sensitive marine environment.

**Meghann Morris** April 7, 2021 at 8:09 AM

Hello Shrila,

Thank you for your email and interest in Lighthouse Point.

Based on survey results using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA) tool, coral reefs do not appear within the footprint of the open-trestle pier or marina. Disney Cruise Line intentionally designed the pier to avoid dredging and instead plans to construct an open-trestle pier, significantly reducing the impact to the marine environment. The pier, berth and marina will be constructed as pile-supported structures with limited direct impacts to the ocean floor. Cruise ships will access the site from deep water offshore. There is not currently a cruise ship pier in Eleuthera.

Per the Environmental Impact Assessment, the combined areas of individual coral and barrel sponges within the footprint of marine facilities is calculated to be 0.0152 acres. When a 75-foot secondary impact buffer is included, the project could potentially impact up to 0.145 acres of coral, of which 0.002 acres are considered endangered. Nearby patch reefs – which are considered to be in "Fair" condition based on AGRRA surveys – are outside of the project area by more than 500 feet and will not be directly impacted.

Disney Cruise Line will develop a coral relocation plan to move any protected corals and adult reef-building coral colonies within the development footprint and buffer zone. DCL has already implemented an ongoing, in-water AGRRA coral reef monitoring program, and will develop a new coral rehabilitation program in coordination with the Perry Institute's Reef Rescue Network Program. Disney has a proven track record with coral relocation and restoration in other areas of The Bahamas.

DCL considered several other locations in The Bahamas and chose this location in part due to its access to deep water to avoid dredging. The marine facilities were placed to avoid coral reefs. Information about the project – including the Environmental Impact Assessment and a related fact sheet – is available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you again

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## #329077 Hello, We live outside of the area but spend time ...

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<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 6, 2021 at 6:32 PM	Mail	Kathleen Griffin <kgrif323@gmail.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

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<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
64	64	generallhpfeedback@disneycruise.com

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**Kathleen Griffin** April 6, 2021 at 6:32 PM

Hello,

We live outside of the area but spend time and vacations in the area and using the Disney vacations on land and sea.

Please rethink the use of this area. It would be a black eye for the Disney brand and possibly a very bad outcome for the beautiful vista.

Thank you

Kathleen G.

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**Meghann Morris** April 7, 2021 at 8:20 AM

Hello Kathleen,

Thank you for your message.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you again

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Support Software by **Zendesk**

## #329129 Lighthouse Point in particular and cruise tourism in general

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<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 7, 2021 at 4:50 AM	Mail	Adventure <adventure@gravity.co.za>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
New	Normal	DCL Comm - General LHP Feedback	-

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### Original Recipient Address

generallhpfeedback@disneycruise.com

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**Adventure** April 7, 2021 at 4:50 AM

Good Day

It is clear that tourism based on large cruise ships is extremely problematic from an environmental and social point of view. The sheer scale of the ships, the amount of fuel they use, the infrastructure that they require in terms of docking etc all raise serious concerns. All of these are relevant with respect to the Lighthouse Point development proposal. In addition, greenfield sites should simply not be considered as an option for these type of developments – we are in the midst of a global climate and biodiversity emergency and anything that contributes further to this, should not be permitted. It is simply not possible that there will be no damage to marine or terrestrial ecosystems. In addition, the damage to the sense of place will be permanent. All over the world, governments are putting restrictions on cruise ships in place – the Bahamas should do the same, rather than developing yet more infrastructure. Tourism infrastructure should be regenerative, both socially and environmentally, contextually appropriate and at island scale, not cruise ship scale.

Thanks,  
Marie-Louise Kellett  
Gravity Adventures  
21 Selous Road, Claremont, Cape Town, South Africa

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## #329324 Bahamas lighthouse

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 7, 2021 at 3:27 PM	Mail	Dee Dee Saavedra <savethepanthers@hotmail.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
111	111	generallhpfeedback@disneycruise.com

**Dee Dee Saavedra** April 7, 2021 at 3:27 PM

I urge you to re-consider the location and the destruction of this unique natural habitat, which is the home for many animals.

Sent from my iPhone

**Meghann Morris** April 7, 2021 at 3:35 PM

Hello Dee Dee,

Thank you for your message.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you again

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## #329352 Regarding DCL Development of Lighthouse Point, Bahamas

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<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 7, 2021 at 4:33 PM	Mail	Luanne Blaylock <leblaylock@yahoo.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
New	Normal	DCL Comm - General LHP Feedback	-

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### Original Recipient Address

generallhpfeedback@disneycruise.com

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**Luanne Blaylock** April 7, 2021 at 4:33 PM

Hello,

I do not live in the area to be developed but I care deeply about our environment and the creatures who share it with us. That being said, I make these comments about the proposed development at Lighthouse Point, Bahamas:

- I am in favor of DCL developing this area. I read the EIA impact summary and it would seem that, IF DISNEY FOLLOWS THROUGH AS THEY PROMISE, most of the area will be preserved and that the areas developed will be done with every consideration for wildlife and the environment.
- Apparently, Disney has proven themselves environmentally sensitive when they expanded their recreational offerings in other such areas. Who better than a large, well-funded corporation who cares to develop a valuable area that will inevitably be developed? Maybe by another entity that doesn't care so much. AND, Disney is a class act that will do it with class.
- Such a project would dramatically improve the economic opportunities for folks living there.
- I just hope that it all plays out as rosy as it is presented. Close monitoring and accountability will be required.

Good luck!  
Luanne Blaylock  
Maumelle, Arkansas  
USA

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**#329472 Disney**


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<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 7, 2021 at 8:55 PM	Mail	Carrie T <63madmoose@gmail.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

---

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
701	670	generallhpfeedback@disneycruise.com

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**Carrie T** April 7, 2021 at 8:55 PM

In no way should Disney nor any of its related businesses be able to conduct business anywhere else ever. They have shown to be a dishonest and deceptive company.

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**Meghann Morris** April 8, 2021 at 11:48 AM

Hello Carrie,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

---

**Carrie T** April 8, 2021 at 12:03 PM

Hacked email

Sent from my iPhone

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## #329481 Disney's plan for Lighthouse Point

**Submitted** April 7, 2021 at 10:51 PM  
**Received via** Mail  
**Requester** Meryl Salzinger <merylsalzinger@me.com>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - General LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 19  
**Time spent last update (sec)** 19  
**Original Recipient Address** generallhpfeedback@disneycruise.com

**Meryl Salzinger** April 7, 2021 at 10:51 PM

> To whom it may concern,

> No matter how many times Disney says it, there is no way to build any kind of docking structure for the size boats they are planning to have dock at Lighthouse Point without major environmental damage. Talk to anyone not on their payroll.

>

> No matter how many times Disney says it, there is no way That the number of people Disney is planing to bring to Lighthouse Point, wearing the amount of coral-killing suntan lotion that they are going to wear will not cause major damage to the coral and the sea life and the waters at Lighthouse Point.

>

> No matter how many times Disney says it, there is no way That bringing all those people to an artificially created "beach" and only letting them shop at vendors who pay Disney fees for the privilege of selling their wares to visitors on their own island will be of any significant economic benefit to the people of Eleuthera.

>

> Why in the world would Disney think it is necessary to change one of the most beautiful, untouched natural wonders in order to bring people to it. As it is, Lighthouse Point is the biggest tourist attraction on Eleuthera. And Eleuthera is the tourist attraction that it is precisely because it is NOT "Disneyfied." No one would allow this kind of damage to a place like the Grand Canyon? Why should we allow it here?

>

> For the love of the earth and the oceans and the fish and the coral in the sea and natural beauty that is the magic of Eleuthera do not do this!

>

> Meryl Salzinger

>

> Sent from my iPhone

**Meghann Morris** April 8, 2021 at 11:49 AM

Hello Meryl,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a

related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

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## #329526 Lighthouse Point and EIA

**Submitted**                      **Received via**    **Requester**  
 April 8, 2021 at 9:17 AM    Mail                      michael <michael@coastalkicks.com>

**CCs**  
 inquiries@depp.gov.bs <inquiries@depp.gov.bs>

**Status**    **Priority**    **Group**                                      **Assignee**  
 Solved    Normal    DCL Comm - General LHP Feedback    Meghann Morris

**Total time spent (sec)**    **Time spent last update (sec)**    **Original Recipient Address**  
 25                                      25                                      generallhpfeedback@disneycruise.com

**michael** April 8, 2021 at 9:17 AM

ATTN: The Bahamas Department of Environmental Planning & Protection  
 RE: Lighthouse Point Eleuthera

I am writing this morning regarding a continuing concern for the introduction of a Disney Cruise installation at Lighthouse Point on Eleuthera.

Any cruise port Disney Operates of any size will have irreversible negative impacts on the immediate area of Lighthouse Point and overall impacts to the entire island.

I reside in the US but have been lucky enough to have been a guest of Eleuthera since 1992 and have a small vacation home in Eleuthera Island Shores. My desire to be on Eleuthera and spend so much time and money there is for the simple fact that it did nit have CRUISE SHIPS, CASINOS, MAJOR HOTEL DEVELOPMENTS THAT DO NOT CONSIDER THE IMPACT AND LAND PLACED ON.

I am not alone as close to 500k have signed a petition against Disney's Cruise port at Lighthouse point. I fully understand that the reason the Bahamas has entertained the idea of allowing Disney this opportunity is for the finacial gain to people os Eleuthera, creation of jobs and growth in Southern Eleuthera.

Majority of jobs will NOT be held by Bahamians. The majority of MONEY will NOT stay in the Bahamas but will benefit DISNEY WHO ARE NOT BAHAMAIAN, WHO ARE NOT BASED IN THE BAHAMAS AND WHO WILL NOT CLEAN UP AFTER A STORM WILL ONE DAY LEAVE IN RUINS THE INFRASTRUCTURE THE BUILT FOR AN UNSUSTAINABLE CRUISE PORT AND CRUISE INDUSTRY.

Any development to that area of Eleuthera should be conducted with the utmost care by only people of the Bahamas, run by people of the Bahamas, controlled by people of the Bahamas to profit only the people of the Bahamas.

I hear very often from the local population 'Its great all these people love our beaches but we cant eat sand, we need jobs and we need development.' I understand their frustration and viewpoint but what most dont realize is the REAL JEWEL OF ELEUTHERA AND MANY ISLANDS OF THE BAHAMAS IS THE PRESERVED AND UNSPOILED ENVIRONMENT. Thoughtful development can be introduced and developed all over the island in a manner that brings money while not destroying the environment. The dredging alone to create what Disney needs will be catastrophic and irreversible.

Please do not go forward with allowing Disney access to Eleuthera or any additional areas of the Bahamas in the future. Bahamas for the people of the Bahamas should be Priority 1,2 & 3.

Sincerely,  
 Michael Stauch

**Meghann Morris** April 8, 2021 at 11:52 AM

Hello Michael,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

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## #329540 The Disneyfication of Lighthouse Point

**Submitted** April 8, 2021 at 10:07 AM  
**Received via** Mail  
**Requester** Theo Linn <ut.atty@gmail.com>

**CCs**  
 inquiries@depp.gov.bs <inquiries@depp.gov.bs>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - General LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 46  
**Time spent last update (sec)** 46  
**Original Recipient Address** generallhpfeedback@disneycruise.com

**Theo Linn** April 8, 2021 at 10:07 AM

To those responsible:

It grieves me to see both my adopted country and one of America's most iconic corporations make a catastrophic mistake that will likely serve as a benchmark from which future generations measure folly. This shortsighted and amoral mistake will mark the precise departure point from which the notion of common-sense-for-common-good was forever replaced by a political, economic and environmental fantasy.

How many cruise ports will The Bahamas allow foreign companies to build, when none has yielded meaningful value in exchange for the loss of this nation's dignity. The relationship is so clearly one of parasite versus host, and yet The Bahamas appears quite comfortable in its position. How many concessions will continue to be made to an industry that anyone could see is unjust. Will the Bahamian government continue to be hoodwinked by the laughable nonsense published by CLIA and FCCA? How long will feckless caribbean-region countries continue to compete against each other in a race to the bottom instead of uniting to bring about a more equitable relationship between the cruise industry and its hosts?

Lighthouse Point is special and you know it. You need only put the Lighthouse Point deal into the perspective it deserves to understand with crystal clarity that what you are doing is nothing short of a mortal sin. Would ANY other country allow the disneyfication of one of its most breathtaking and irreplaceable natural wonders? Would the United States allow Disney to build a theme park in the Grand Canyon or Yellowstone, or Yosemite? Would Zambia and Zimbabwe allow Disney to take over Victoria Falls? Would New Zealand allow an amusement park in Milford Sound? Would the nation of Chile approve a development drawing one million visitors per year even as it creates a self-evident risk to Patagonia's irreplaceable grasslands, riparian forests and wetlands? Would Ecuador allow Disney to build a cruise port in the Galapagos? Would Australia invite Disney to do its thing on the Great Barrier Reef or the red sands of Uluru? Clearly not, and yet the Bahamian government is champing at the bit to allow Disney Cruise Lines to insult the entire human race by "improving" Lighthouse Point and providing economic "opportunity" to local Bahamians. That is twisted fantasy proved wrong so many times throughout the archipelago. You need only examine Disney's other port, Castaway Cay, to witness a parasite draining the lifeblood of this country. And now, as Joni Mitchell once wrote, you want to pave paradise and put up a parking lot. All the EIA's in the world are worth nothing if the project itself is a grave sin.

You want to convince yourself and the Bahamian people that bringing a million people per year to an "improved" Lighthouse Point will have negligible environmental impact. Why not try to convince yourselves that you can fly? That might be more realistic. Lighthouse Point could have been a Yellowstone, or a Milford Sound, or a Galapagos. Plans were introduced to do just that. And yet the Bahamian Government lacked confidence *in its own people*. Think about that.

From a personal perspective, I have invested my life savings in this country, but now I have lost faith and will stop investing. Tourism is this country's backbone, and yet the government does not appear capable of seeing that the cruise industry is the world's *worst* form of tourism, regardless of the lens through which it is examined: economic, environmental, cultural, etc. The Bahamian government knows Disney's spin doctors got to a few of the more vulnerable residents of south Eleuthera, yet instead of investing in the a plan that would have provided them with

real opportunity, with real hope, with real ownership, the government chose instead to support yet another foreign scheme to bleed this country dry and quite literally sail into the sunset with all profits. I am literally sickened by what I have seen.

At the end of it all, those who played a hand in making Disney's Lighthouse Point project come to horrifying life will sleep just fine. Humans are capable of convincing themselves of the most extraordinary things. I myself will dream of a time when Lighthouse Point was a natural wonder. The area was stolen from the people during the bad old colonial days. It was commoditised by foreign prospectors. And never did the Bahamian government even *attempt* to get it back. With the stroke of a pen, the Government could have stopped this terrible deal. With the stroke of a pen, it could have invested in its own home-grown entrepreneurs and visionaries. But it failed to act at every opportunity. There will be no profit-sharing, no property taxes, no commitment to public infrastructure, no free market, no import duties, no dignity. There will be no sustainability. The Bahamas will always be subject to the whims of a foreign company driven by invisible tides.

"For greed, all nature is too little" --- Lucius Annaeus Seneca

Theo ("Tad") Linn  
Skype cell number: +1 954 603 7363  
Bahamas cell number: +1 242-559-3714

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**Meghann Morris** April 8, 2021 at 11:51 AM

Hello Theo,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

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 **#330758 Lighthouse project**

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<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 10, 2021 at 7:29 PM	Mail	TheBklynmermaid <bklynmermaid@gmail.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
New	Normal	DCL Comm - General LHP Feedback	-

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**Original Recipient Address**generallhpfeedback@disneycruise.com

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**TheBklynmermaid** April 10, 2021 at 7:29 PM

To whom it may concern

No matter how many times Disney says it, there is no way to build any kind of docking structure for the size boats they are planning to have dock at Lighthouse Point without major environmental damage. Talk to anyone not on their payroll.

No matter how many times Disney says it, there is no way That the number of people Disney is planing to bring to Lighthouse Point, wearing the amount of coral-killing suntan lotion that they are going to wear will not cause major damage to the coral and the sea life and the waters at Lighthouse Point.

No matter how many times Disney says it, there is no way That bringing all those people to an artificially created "beach" and only letting them shop at vendors who pay Disney fees for the privilege of selling their wares to visitors on their own island will be of any significant economic benefit to the people of Eleuthera.

Why in the world would Disney think it is necessary to change one of the most beautiful, untouched natural wonders in order to bring people to it. As it is, Lighthouse Point is the biggest tourist attraction on Eleuthera. And Eleuthera is the tourist attraction that it is precisely because it is NOT "Disneyfied." No one would allow this kind of damage to a place like the Grand Canyon? Why should we allow it here?

For the love of the earth and the oceans and the fish and the coral in the sea and natural beauty that is the magic of Eleuthera do not do this!

Patricia Sener

Sent from my iPhone

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Support Software by **Zendesk**

## #339978 Lighthouse Point Environmental Impact Assessment Review

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 19, 2021 at 7:58 PM	Mail	jjuarez2@uncc.edu <jjuarez2@uncc.edu>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
18	18	generallhpfeedback@disneycruise.com

**jjuarez2@uncc.edu** April 19, 2021 at 7:58 PM

To: DCL Island Development, Ltd

[GeneralLHPFeedback@disneycruise.com](mailto:GeneralLHPFeedback@disneycruise.com)  
(800) 951-3532

From: Joana Juarez

9201 University City Blvd

Charlotte, NC 28233

Email: jjuarez2@uncc.edu

### TO WHOM IT MAY CONCERN,

The Disney Lighthouse Point proposition appears to be a promising project. However, based upon examination of the Lighthouse Point Environmental Impact Assessment (EIA), the proposed development on and around Eleuthera, the Bahamas would lead to damaging ecological impacts. Additionally, the data presented was minimal and should be developed further. It has been made evident that Disney's EIA is lacking vital information.

For instance, data surrounding coral, seagrass and mangroves summarized that populations were concentrated in the southeastern portion of the island, thus development would be moved elsewhere. However, this conclusion is based only on data conducted in the southeastern part of the island. How does DCL Island Development know that the new location is not disrupting populations if research has not been done for the entire area? In other words, this lack of data needs to be addressed before any sort of plans can be discussed, much less constructed. Also, concerning coral and seagrass, the material within the Environmental Impact Assessment only focused on certain types of each organism (e.g., stony coral and turtle grass). Proper assessment must examine every single organism that will be *and* could be disrupted. This would ease customers and ensure that Disney stays true to its environmental policies.

Additionally, the Lighthouse Point EIA does not adequately address the presence of sea turtles in Eleuthera. Sea turtles are invaluable resources to marine and human life, yet the Disney document reports no observations of the creatures. Contradictory to this, local fisherman reported substantial sightings of turtles and nesting areas. Along the same lines disruptions to whales and dolphins will be significant. According to the EIA, developers will consult a marine mammal biologist to develop appropriate construction methods. However, it is best to bring in an entire *team* of marine biologist in order to gain second opinions and to come up with *several* different solutions on how best to approach and deal with the sea creatures. Also, the exclusion zones that will be

designated for these mammals are essentially ineffectual. It is common knowledge that dolphins and whales move around and are not stagnant. These exclusion zones do not account for this migration. Is Disney not responsible for damage done outside of these zones? Will Disney not take accountability?

In terms of land-based issues, the research and proposed mitigation efforts regarding birds are satisfactory. The extensive monitoring and incorporation of native plants most commonly used by the birds will serve the creatures well and ensure a smooth transition. Concerning the Casuarina Tree, given the affection of the locals to the tree but the invasive nature of the plant, it is best to work alongside the natives. Communication is key in the removal of the Casuarina because the spread could create additional headaches. Another area that lacked data was the Lionfish. This invasive species featured minimal data and should be investigated and monitored further. The fish is already highly destructive of local ecological food sources, meaning additional disruption from Disney development could lead to consequential stress towards present organisms.

In summary, the Disney Lighthouse Point Environmental Impact Assessment does not properly address the ecological impacts on marine and terrestrial life. Thus, Disney should continue to develop their data before any construction is done.

Sincerely,  
Joana Juarez.

\*The attached document contains the same content written above.\*\*

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**Meghann Morris** May 6, 2021 at 4:11 PM

Hello Joana,

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity – with the appropriate environmental management plan in place.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists. This information may be found in the EIA section 4.2.2 MARINE RESOURCES (page 4-89). A full species list of all flora and fauna observed during marine assessments at the site can be found in the EIA in Appendix C, Baseline Marine Species List (page C-1).

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier, 0.145 acres of individual corals could be potentially impacted. Mitigation efforts prior to construction will include translocating coral species, relocating barrel sponges, moving "minimally mobile" species, such as urchins, sea stars and sea cucumbers, and the potential use of fish habitat thruways to encourage natural passage of migratory and residential fish. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES (page 7-3)

The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 Marine Reptiles (page 4-134 - 4-

135). Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. No sea turtle nesting activity has been observed to date. That being said, Disney has more than 15 years managing nesting sea turtles at Disney's Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting site in the world. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney's Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <https://myfwc.com/license/wildlife/marine-turtle-permit/>. If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.

Data on whales and dolphins can be found in the EIA section 4.2.2.7.1 Cetaceans (page 4-132 – 4-133). We recognize construction can cause temporary impacts to local marine mammals within the direct area. Therefore, we will employ standard techniques for marine mammal protection during construction in the marine environment, which are consistent with U.S. standards. Environmental Managers will monitor for dolphins and whales within the area whenever in-water construction is occurring and will have the ability to stop construction based on their distance from the activity, which will be established by marine mammal specialists. Also, the project will use soft starts, which ramp up the noise over time to give the animals time to avoid the area. It is not believed this will impact dolphin or whale migration.

We are in agreement with your concerns with invasive Casuarina trees. The majority of Casuarina in impacted areas will be mechanically removed and transported to designated vegetation management areas for repurposing (e.g. charcoal, furniture, etc.) and/or disposal. Casuarina in sensitive areas will be addressed on a case-by-case basis with the decision being based on the degree to which high-quality natural habitat is present in the vicinity and impact to the environment. You can find this information in the EIA section 6.1.5 DIRECT AND INDIRECT IMPACTS TO CASUARINA-DOMINATED DUNES (page 6-7 – 6-8).

We are also in total agreement with your concerns regarding lionfish, which is highlighted in the EIA section 7.4.2 MARINE INVASIVES (page 7-17). Lionfish were encountered during marine assessment work at the Lighthouse Point site in low numbers. This highly destructive non-native fish can disrupt the ecological trophic balance by consuming large numbers of small invertebrates and fish. Disney will work with the local community and the Government of The Bahamas to support a lionfish management program within the Lighthouse Point area.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #343925 Lighthouse Point

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 28, 2021 at 5:30 PM	Mail	Matthew Taillon <mtaillon@uncc.edu>

### CCs

Angelique Hjarding <ahjardin@uncc.edu>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
1140	1140	generallhpfeedback@disneycruise.com

**Matthew Taillon** April 28, 2021 at 5:30 PM

Please see the attached letter for my comments to your proposed development of Lighthouse Point in the Bahamas.

**Meghann Morris** June 29, 2021 at 12:08 PM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.

Disney has proposed a no dredge development and the planned open-trestle (not floating) pier design and small marina were selected and sited in part because they avoid dredging and the associated direct and secondary impacts caused by changes in nearshore water circulation, natural bathymetry and increased turbidity/sedimentation. Additional information on this can be found in the EIA Section 3.1.2.1 Navigation Channels/Basins. Anchoring and ferrying were considered as an option and found to have greater long-term impacts including damage to the sea floor from anchoring as well as increased emissions caused by the ferries used to transport guests over time.

Regarding identification of marine and terrestrial species on site, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology can be found in the EIA Section 4.2.1. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species.

Terrestrial field investigations began with a literature search and discussions with representatives from local organizations, followed by landside surveys. During the surveys, vegetative community types, as well as other land cover and land uses were characterized, and observations were made regarding the presence of birds and other animal species.

Field investigations started in October 2017 and monthly surveys continue to this date capturing several years of seasonal information including nesting migration seasons.

All plant and animal species that were observed within the areas that are proposed for development are also present in the approximately 80% of the property where no construction is proposed. Disney has proposed mitigation for impacted areas that includes conservation and protection of a portion of the property where piping plovers have been observed (Bottle Bay); implementation of a bird monitoring program to monitor populations before, during and immediately after construction; limiting clearing for all required areas to the immediate area necessary for development with surveys completed in advance; a conscientious effort to remove and/or control invasive non-native species that are listed in The Bahamas National Invasive Species Strategy, complemented by a landscaping program that uses a palette of native trees and shrubs to encourage native fauna visits; and the relocation of notable flora and/or fauna identified within the development footprint, if feasible, with requisite permits obtained from relevant Government agencies where appropriate.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists. This information may be found in the EIA section 4.2.2 MARINE RESOURCES. A full species list of all flora and fauna observed during marine assessments at the site can be found in the EIA in Appendix C, Baseline Marine Species List.

Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts that need to be addressed.

Lastly, the development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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**Matthew Taillon**

[mtaillon@uncc.edu](mailto:mtaillon@uncc.edu)

15th April 2021

**The Walt Disney Company**

Dear Disney,

I am Writing this letter to express my objection to the proposed development of Lighthouse Point, in the Bahamas. I am an Environmental Studies Major at UNC Charlotte, and throughout the semester my class has been discussing sustainable development, as well as the importance of wildlife conservation and management. After reading through your proposed EIA, I found it lacking matters of protecting the environment and the indigenous species. As someone who has recently visited the Bahamas and been to the area near to the proposed site, I know that there is a very diverse ecosystem. Your proposal showed a serious lack of concern for the numerous species, and only listed a few poorly laid out ideas. Out of a 551 page PDF, less than 20 pages (in a large font) were devoted to the terrestrial ecosystem that is being developed. Most of the document put off the true research to be done in the future, and the EIA frequently discusses making specific Environmental Management Plans to appropriately address issues instead of creating those plans to put in this document.

The marine environment is covered much of the same way, and it is even more diverse than the island itself. The area northeast of the proposed Lighthouse Point is currently being reviewed for becoming a protected habitat. These same waters are home to the lanes where the cruise liners come through. The proposal outlines plans to create a floating dock for the ship, which would most likely require dredging a new trench for the cruise ships to follow. The Carnival Cruise line uses the nearby Half Moon Key as a port of call, and uses small ferries to shuttle people to the island. I believe that that would be a very popular alternative.

As a citizen of the planet, as a visitor to the Bahamas, as a fan of the Walt Disney Company, and as a college student, it is clear to me that there is a lot more work that needs to be done before any development should be started. The environment is our most precious resource, and sending tourists to traipse all over it is a great way to ruin it. Introducing people to an environment that is unfamiliar with their presence is a great way to damage the relationship between the species that live there. Without proper study and research, and the time necessary to do so, you could end up destroying the natural beauty of the island and its inhabitants. Please reconsider your proposal, and put people in charge of it that care about the land, rather than those who would exploit it for personal gain.

Sincerely,

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**Matthew Taillon**

## #344197 Disney Lighthouse Point EIS/EIA concerns

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 29, 2021 at 10:28 AM	Mail	Alex Nowatkoski <anowatko@uncc.edu>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
62	62	generallhpfeedback@disneycruise.com

**Alex Nowatkoski** April 29, 2021 at 10:28 AM

Please see my attached write-up for concerns on the published EIA evaluation.

Thank you,

Alex Nowatkoski

**Meghann Morris** June 29, 2021 at 9:36 AM

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well. Many of your comments will be more appropriately addressed in the EMP; however, we have provided a response below where possible.

Disney's planned open-trestle pier design and small marina were sited and selected in part because they avoid dredging and the associated direct and secondary impacts caused by changes in nearshore water circulation, natural bathymetry and increased turbidity/sedimentation. Based on geophysical investigations of the underlying geology, the current proposed construction approach for the trestle calls for pile rock socket drilling and in-hole anchoring to secure each pile. The placement of any structure onto the seafloor will have local impacts within the immediate vicinity. We have tried to account for these impacts (including construction equipment) by including a 75-foot wide buffer on all sides of the proposed structures as highlighted in the EIA.

Based on surveys using globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), coral reefs do not appear within the development footprint. The seafloor where the proposed structures will be placed is composed primarily of hardbottom coral communities and sand. Including the 75-foot buffers and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before

development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

Disney has also committed to rebuilding any lost structural relief within the development footprint by using natural limestone to enhance adjacent areas after construction is completed. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES.

The longer-term secondary impacts associated with the placement of in-water structures (e.g., trestle and small vessel marina) to the LHP ecological system are more difficult to assess but consideration for potential known influences to marine life has been included into the design and plan for long-term environmental management. Barriers to fish movement and migration has been given careful consideration. Both the small vessel marina and trestle will include throughways to allow fish to freely move through them. Changes to water flow have also been examined and around each piling we do anticipate small scale changes in water movement (scale of 1 cm-10m) which may cause some localized changes in the immediate vicinity of the seafloor around the piling. However, we do not anticipate larger scale (~>10m) changes to water circulation or rates of flow. The design of the trestle includes large, open gaps between pilings that will allow water to flow freely and are not expected to cause any significant changes to local tidal circulation or natural patterns of flow. Turbidity and sedimentation are potential secondary impacts that have also been closely examined given the sensitivity corals have to these stressors. While turbidity related impacts are unlikely given the proposed construction methods, turbidity and sedimentation will be monitored with protocols to minimize and prevent any issues during construction and operation. To assess direct and secondary ecosystem impacts (both anticipated and unanticipated), there will be regular monitoring of 36 fixed index sites. Each site includes high resolution imaging of a 100m<sup>2</sup> area of the seafloor that allows tracking of changes in the condition of corals, seagrasses, and other sessile invertebrates. These sites span all habitat types within and outside of the development area (and include control sites well outside the Disney property) to measure changes across a range of ecological indicators and examine possible causes and effects as a result of the project. We are committed to using science-based monitoring and adaptively managing the site to minimize losses to the larger ecosystem.

Moreover, Disney has committed to restoring and enhancing habitats within the area that are already in degraded condition. Disney has substantial experience working with corals and reef systems in The Bahamas with our internal coral scientists and conservationists and nonprofit conservation partners who together have developed a successful model for rehabilitation of declining habitats caused by global changes, increasing coral coverage on the reefs at that site. These successful methods have been expanded to other areas of The Bahamas through ongoing collaboration. We are using this knowledge to develop comprehensive coral monitoring programs to inform any adaptive management or reactive strategies that may be used at Lighthouse Point. The Environmental Management Plan will include ongoing monitoring of coral health in the area and outline strategies to respond to any adverse environmental conditions that are observed over time. Additional potential protective procedures and mitigation are identified in the EIA Section 7 - Proposed Mitigation Measures.

Through our Heads of Agreement with the Government of The Bahamas we have committed to develop less than 20 percent of the property and current development plans call for development of 16 percent of the property. We have adjusted the design plans based on findings from our field investigations to avoid sensitive areas like the ponds and islands south of the property. We also moved the development footprint to avoid an area with the lone wetland in the NW corner of the site. Any construction and operations throughout the life of the project will comply with effective sediment and erosion controls. Best Management Practices (BMPs), including site-specific controls and turbidity management measures will be followed to minimize impacts to water quality in the pier and berth areas and a turbidity management plan will be part of the Environmental Management Plan. BMPs will be employed during land clearing activities to limit impacts and reduce the potential for sediment transport during storm events, with a focus on avoiding impacts to subsurface voids, ponds, wetlands, and the marine environment, and additional information on this can be found in the EIA Section 3.1.3.8.

Regarding construction materials, all materials storage will be kept away from sensitive environmental features. Fuel storage and refueling will adhere to best practices, including raised storage with either 110 percent containment mechanism or doubled walled tanks in the event of spill. Both construction and operation will employ land and marine-based real-time monitoring stations to evaluate the impact from any such activities on marine/surface water quality and be addressed throughout. We studied the U.S. Army Corps of Engineers maps of south Eleuthera to understand the freshwater lens in and around Lighthouse Point. These maps suggested a freshwater lens exists in the NW section of the property and as already shared, we are not developing in this area. If a freshwater lens is encountered during construction, additional investigations will be conducted to ensure that there are no impacts to the source. Additional actions will be taken to preserve the source if one is encountered, including monitoring wells and/or casing wells. We have no intent to utilize any freshwater lens on the property to supply water to Lighthouse Point. The well for the proposed RO system will be sealed or encased

to ensure no connection to other water resources will be created.

Neither the pier, nor the construction materials used to build it are expected to discharge chemicals into the water beyond regular wear and tear. The flushing effect of the extensive body of water surrounding Lighthouse Point is expected to prevent direct impacts to marine biochemistry.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you

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Dear Disney

I am writing this letter to you in reference to the Environmental Impact Assessment (EIS) regarding Lighthouse Point Eleuthera in the Bahamas. I have attended the public hearing that took place on Thursday, April 8, 2021 and have spent my personal time reviewing the EIS prepared on for Disney Cruise Line (DCL). As a construction engineering student, with a background in site development and geotechnical engineering, I am very concerned with the proposed expansion(s) that are outlined in the EIS.

To begin, the first concern and flag that is raised is in the first paragraph on page 27. The last sentence begins to draw the conclusion that pile-driving for the cruise ship berthing pier and the rampway (trestle bridge) leading to the island will have minimal impact to “. . . benthic habitat and nearshore currents”. Any pile-driving techniques coupled with the size of piles and their frequency will disrupt not only the immediate footprint of the pile. The surrounding area (a function of pile size and displacement) will also experience secondary effects of the driving force.

With the ocean floor located under the trestle bridge and berthing pier being comprised of multiple classifications, each classification has not been adequately assessed in the effects of a pile-driven structure being placed in these proposed locations. Page 225 of the EIS document encompasses the corresponding areas that are to be covered and disturbed by these structures. While there is information on the immediate impacts on these structures being placed, the long-term effects for the ecological system have not been addressed and may create problematic circumstances in the future. Minimizing the immediate impacts and developing a plan to eliminate long-term impacts has not been fully investigated and needs to be done so for construction safety purposes.

Also, from the perspective of a guest, why would I want to walk nearly half a mile (0.44 to be exact) after exiting any cruise vessel to access the island? I understand the location of the berthing pier is based on depth, but the pier is located 2,348 feet offshore.

Second, the use of tracked vehicles to move materials and soil/sand throughout the construction areas can create different outcomes that are not addressed in the EIA. The amount of dust kicked up into the air from sand, stone/gravel, and soil is not mentioned throughout the EIA. This transfer of fine-grained particles possess a risk to workers and the surrounding waters. Direct impacts to the marine biochemistry by changing carbon levels, sulfur concentrations, and other chemicals have not been addressed in the EIA and will all be direct results of construction materials. Also, construction materials themselves, such as concrete, steel, wood, and many others will produce their own footprint when cutting to required lengths and thicknesses. The impacts of these materials in the construction of any permanent structure is not addressed throughout the EIA document.

Thank you for taking the time to read my concerns and response to the EIA and I look forward to receiving a response.

Alex Nowatkoski

## #344401 Lighthouse Point

**Submitted** April 29, 2021 at 2:59 PM  
**Received via** Mail  
**Requester** Thomas Palmer <tpalme12@uncc.edu>

**CCs**  
 inquiries@depp.gov.bs <inquiries@depp.gov.bs>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - General LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 43  
**Time spent last update (sec)** 43  
**Original Recipient Address** generallhpfeedback@disneycruise.com

**Thomas Palmer** April 29, 2021 at 2:59 PM

Disney Cruise Line and Bahamas Department of Environmental Planning,  
 Thank you for valuing public opinion and not rushing into something the world will resent and the environment will hate. Thank you for your time in reviewing the issues with the Lighthouse Point plan.  
 Preston Palmer  
 University of North Carolina at Charlotte  
 Senior Civil Engineering Technology Student  
 The Ivy Place Weddings and Berry Farm

**Meghann Morris** June 29, 2021 at 10:20 AM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection (DEPP).

We have spent three years working hand-in-hand with a team of highly qualified and experienced scientists, wildlife ecology specialists, professional engineers, and constructions experts on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.

Regarding marine noise once operational, Disney Cruise Line vessels will utilize shipping lanes already used by other commercial ships and use by Disney ships is not expected to significantly impact this area in context with other ship traffic. During operation we will work with consultants to train vendors and staff on proper strategies to help protect marine mammals and monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts. Data on whales and dolphins can be found in the EIA section 4.2.2.7.1 Cetaceans (page 4-132 – 4-133). We recognize construction can cause temporary impacts to local marine mammals within the direct area. Therefore, we will employ standard techniques for marine mammal protection during construction in the marine environment which are consistent with U.S. standards. With this in mind, we have contracted SMRU Consulting, the world's leading marine mammal consultancy trained in the interface between marine mammals and construction.

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Marine resource surveys using the globally recognized Atlantic Gulf Rapid Reef Assessment (AGRRA) show coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier, 0.145 acres of individual corals could be potentially impacted. Pre-construction mitigation for hard bottom habitats directly impacted will focus on transplanting of stony coral, relocating barrel sponges, moving "minimally mobile" species, such as urchins, sea stars and sea cucumbers, and the potential use of fish habitat thruways to encourage natural passage of migratory and residential fish.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as "the Bridge," which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will mostly be addressed in the Environmental Management Plan, which is the second phase of this process outlined by Bahamian laws and regulations. That said, our plan is to target zero waste to landfill in Eleuthera. Of note:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.

The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line. While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.

- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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**LIGHTHOUSE POINT**

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**TO:** DISNEY  
**FROM:** PRESTON PALMER  
**SUBJECT:** ENVIRONMENTAL IMPACT ASSESSMENT  
**DATE:** 4/15/21

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Dear Disney,

My name is Preston Palmer, a Civil Engineering Technology student at the University of North Carolina at Charlotte. Recently, my class (Environmental Planning) and I have been studying your planned development of Lighthouse Point south of Eleuthera in the Bahamas. I attended the public consultation hearing regarding this matter on April 8th, 2021 and was thoroughly impressed. I was impressed with the Disney representatives' professionalism in dealing with tough questions from ruffled people, the validity of questions asked, and that there was a public hearing at all. In reality, the meeting seemed to carry no importance at all. If I had to guess that meeting was for public relations propaganda just so the company can say that it held a public hearing.

As of now my understanding is that only an egregious act against the environment can reverse this development in the other direction. What constitutes an egregious act? I am sure that Disney's version of an egregious act would be much different than that of the public's opinion. Speaking of the public, how is it that an environmental impact

assessment takes three years to complete and yet the public only receives one month to review and report issues within it? The length of time is obviously purposeful so that nobody has time to report then assess any “egregious” errors in the EIA. Despite offering the public hearing it seems the decision to develop Lighthouse Point has already been made and any form of transparency in this process is false.

After reviewing chapters 4, 6, and 7 in the EIA I have my doubts with how construction will be conducted. In the EIA, it states that noise causes issues for cetacean species. Which construction practices cause this excessive noise and how are you prepared to halt construction? Has anyone who made this EIA ever been on a construction site? If so, I would assume the contractor you plan to hire is patient and understanding because I seriously doubt any construction will be halted to allow safe passage for cetaceans. Schedules drive construction not cetaceans. What is the true impact of several cruise ships sailing through a proposed marine protected zone each year? What is the impact of building a .6 mile long dock out to meet the cruise ships? I can agree that building a long dock to meet the cruise ship is better than dredging, but after reading the EIA it seems the impacts from these developments are glossed over.

Disney has stated that the Lighthouse Point development will be environmentally friendly and provide economic opportunity for Bahamians. We know that a large of part of the Bahamas’ economy is the tourism industry. While 75% of the tourists in the Bahamas come from cruise lines, only 10% of the country’s tourist revenue stream comes from cruise tourists. In the EIA, it was stated that this development will have zero waste once it is up and running. Will the excess waste be put into the ocean or taken back to the mainland and then thrown in a landfill? I along with many others have numerous

concerns regarding the development of lighthouse point. I think it is extremely questionable that the public is only given one month to review a lackluster EIA. It seems to me that Disney is not being fully transparent with the development's assessment as 1 month is an unfair time limit for EIA review. I know my opinion means little in the long run but maybe giving people more time to review this issue will mean a lot in the long run.

Sincerely,

Preston Palmer

## #345371 Lighthouse Point Development Comments

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
April 30, 2021 at 11:02 PM	Mail	Michelle Dunbar <mdunbar1@uncc.edu>

### CCs

Angelique Hjarding <ahjardin@uncc.edu>, inquiries@depp.gov.bs <inquiries@depp.gov.bs>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
100	100	generallhpfeedback@disneycruise.com

**Michelle Dunbar** April 30, 2021 at 11:02 PM

Greetings,

I am writing this letter in reference to the Lighthouse Point plan. As a student in Earth Sciences and Environmental Planning, I am concerned about the planned tourist islands effect on the natural ecosystem. The island is an important habitat for many species of plants and animals which will be displaced because of development of the island for Disney's use. I will go over the Environmental Impact Assessments issues, including but not limited to: the timing of the release and the unfairness of the time allowed for the public to comment on it, the impact on marine plant and animal life, the impact on the terrestrial plant and animal life, invasive species mismanagement, and protected wetlands not being taken care of.

The first issue that I have with the Environmental Impact Assessment is that while Disney spent three years putting it together, they have given the public only 30 days to read and understand it and submit comments for it. This is completely unfair and is in no way a justifiable action. It is a prime example of how large corporations get to make their own rules because they own too much.

The rest of the issues in this letter have to do primarily with Sections 7.2-7.6, on pages 257-272.

The issues that the content of the EIA impose are manyfold, and they begin with the impact on marine life. Coral, seagrass, and mangroves are all present around the island in varying amounts, and their protection should be of the utmost importance. It is well known that coral are very sensitive to human impacts, and they are often destroyed, whether by accident or on purpose when humans reach their sticky little fingers where they don't belong. Our coral reefs on earth have been subject to bleaching, breaking, and even being carved into for fun. The right thing to do is to leave them alone, and the best way to ensure that happens is to discourage any human activity near coral reefs. Seagrass and mangroves are important parts of shallow water ecosystems, and they should be left alone as well. As for the mitigation proposals made by Disney in the EIA, transplanting stony coral is better than nothing but it poses many more risks than not developing the island and leaving them alone in the first place.

The animals that live on and around the island are just as important to the health of the ecosystem as the plants. The island of Eleuthera is home to a large sea turtle nesting area and foraging by young turtles also occurs on the island. The EIA is laughable in this regard, acting as if there is no nesting seen at all, when in fact there are lots of turtles around the island. There is very little detail given in this section of the EIA as to what Disney will do to protect the marine animals during construction, saying the best management practices will be used. If there were actual plans in place with specific practices, they would be in the EIA, no?

Next, the terrestrial wildlife is considered. In this section, three bird species are mentioned: Piping Plovers, Great Lizard Cuckoos, and Kirtland's Warblers. No other animals are considered, despite the fact that there many species of amphibians and reptiles native to the island. There is a plethora of terrestrial animals, all of which would be affected by development on the island. There weren't many specifics on the management practices that would be put into place to protect the birds on the island, which indicates a serious lack of effort done into researching how to keep the animals of Eleuthera safe.

The invasive species mentioned in the EIA include Casuarina trees and Lionfish on land and in the water respectively. The proposed mitigation for these was to dig up the trees, possibly scattering seeds and worsening the problem, and using them for mulching or firewood. Mulching the wood poses a threat of new trees growing up out of the mulch if it is put back on the ground, which would worsen its impact on the island. If there are already management practices in place for Casuarina Disney should work with them to mitigate the impacts of the species. For the lionfish there is little to no information given in the EIA on proposed plans.

Wetlands are very sensitive environments that often contain multitudes of plant and animal species native to the island. Disney doesn't anticipate any wetland areas to be impacted. This is foolish because any large scale development on the island (precisely what Disney plans to do) is bound to affect wetlands nearby. Any pollutants could be washed into the wetlands, poisoning them. This is made even more likely by the introduction of many impermeable surfaces, which is inevitable when development happens. Runoff impacts are not discussed at length in the EIA.

To sum up, the Environmental Impact Assessment did not investigate in nearly enough detail the devastating impact that Disney would have on the natural environment on Eleuthera. It is my opinion as an Environmental Scientist that this EIA is not valid and more research should be done on the potential impacts of development on the island of Eleuthera before Disney is allowed to do anything there.

Sincerely,  
Michelle Dunbar  
BS Earth and Environmental Sciences  
University of North Carolina at Charlotte

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**Meghann Morris** June 29, 2021 at 12:19 PM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection (DEPP).

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. DEPP oversees the public consultation process.

Regarding identification of marine and terrestrial species on site, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology can be found in the EIA Section 4.2.1. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species.

Terrestrial field investigations began with a literature search and discussions with representatives from local organizations, followed by landside surveys. During the surveys, vegetative community types, as well as other land cover and land uses were characterized, and observations were made regarding the presence of birds and other animal species.

Field investigations started in October 2017 and monthly surveys continue to this date capturing several years of seasonal information including nesting migration seasons.

All plant and animal species that were observed within the areas that are proposed for development are also present in the approximately 80% of the property where no construction is proposed. Disney has proposed mitigation for impacted areas that includes conservation and protection of a portion of the property where piping plovers have been observed (Bottle Bay); implementation of a bird monitoring program to monitor populations before, during and immediately after construction; limiting clearing for all required areas to the immediate area necessary for development with surveys completed in advance; a conscientious effort to remove and/or control invasive non-native species that are listed in The Bahamas National Invasive Species Strategy, complemented by a landscaping program that uses a palette of native trees and shrubs to encourage native fauna visits; and the relocation of notable flora and/or fauna identified within the development footprint, if feasible, with requisite permits obtained from relevant Government agencies where appropriate.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists. This information may be found in the EIA section 4.2.2 MARINE RESOURCES. A full species list of all flora and fauna observed during marine assessments at the site can be found in the EIA in Appendix C, Baseline Marine Species List.

Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts that need to be addressed.

The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 Marine Reptiles. Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. No sea turtle nesting activity has been observed to date. That being said, Disney has more than 15 years managing nesting sea turtles at Disney's Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting activity in the world. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney's Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <https://myfwc.com/license/wildlife/marine-turtle-permit/>. If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.

Regarding runoff, we plan to mitigate potential impacts using proper design and development Best Management Practices. Stormwater runoff from roads and other impervious surfaces within Lighthouse Point will be handled with standard accepted BMPs. Runoff from these areas will be directed away from the existing ponds and handled in a manner that will provide sedimentation and water quality management. More specific details regarding stormwater management will be provided in the Environmental Management Plan, which is the second phase of this process as outlined in Bahamian laws and regulations.

We are in agreement with your concerns with invasive species, including Casuarina trees and lionfish. The majority of Casuarina in impacted areas will be mechanically removed and transported to designated vegetation management areas for repurposing (e.g. charcoal, furniture, etc.) and/or disposal via controlled burn boxes. Casuarina in sensitive areas will be addressed on a case-by-case basis with the decision being based on the degree to which high-quality natural habitat is present in the vicinity and impact to the environment. You can find this information in the EIA section 6.1.5 DIRECT AND INDIRECT IMPACTS TO CASUARINA-DOMINATED DUNES. Regarding lionfish, additional information is highlighted in the EIA Section 7.4.2 MARINE INVASIVES. Lionfish were encountered during marine assessment work at the Lighthouse Point site in low numbers. This highly destructive non-native fish can disrupt the ecological trophic balance by consuming large numbers of small invertebrates and fish. Disney will work with the local community and the Government of The Bahamas to support a lionfish management program within the Lighthouse Point area.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #346519 Cruise Ship Port to be Built at Lighthouse Point, Eleuthera

**Submitted** May 3, 2021 at 11:52 AM  
**Received via** Mail  
**Requester** andrea clarke <andreaclarke56@hotmail.com>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - General LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 38  
**Time spent last update (sec)** 38  
**Original Recipient Address** generallhpfeedback@disneycruise.com

**andrea clarke** May 3, 2021 at 11:52 AM

To whom it may concern,

There are a several points I would like to be heard on as to why Disney Cruise ships SHOULD NOT have a port at Lighthouse Point, Eleuthera:

1. As I have been to this location many times over the past, it is serene and peaceful to nature (both aquatic and land). It truly is one of the few places left on the planet Earth that is all about nature.
2. With the offshore hazardous waste dumping from cruise ships and the North Equatorial Current, the Atlantic ocean side of the island of Eleuthera gets polluted with cruise ship ocean dumped waste. A section of the North Equatorial Current splits off at the base of the Bahama Island chain and continues on to the tip of South Florida and rejoins the main North Equatorial Current on its way up the US Eastern seaboard as the Gulf Stream carrying cruise ship dumped rubbish and hazardous wastes with it.
3. Cruise ships discharge a number of hazardous wastes into the marine environment: sewage, graywater, oily bilge water, ballast water and solid waste...too name a few...that DESTROY marine environments.
4. The destruction of natural land habitats from all the passengers that disembark from the cruise ship. I recently read the story about Mauro Morandi who has lived on the Italian island of Budelli (north of Sardinia) for 32 years. An island that used to have lovely and virtually untouched pink sandy beaches (just like Lighthouse Point, Eleuthera), but due to the tourists coming to the island and taking handfuls of the pink sand as souvenirs, NOW the pink sand is NO MORE. Which brings me to another point of how the sand became pink...the LIVE pink coral.....which will most certainly be KILLED by Disney cruise ship traffic and water pollutants.
5. Also, cruise ships emit air pollutants into the air which is not environmentally friendly to the native Bahamian people, their farming land or their fishing livelihood.

I send these concerns with the hopes my voice has been heard.

Kind regards,

Andrea Clarke

Sent from [Mail](#) for Windows 10

**Meghann Morris** May 13, 2021 at 9:55 AM

Hello Andrea,

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other

professionals on our Environmental Impact Assessment (EIA) for Lighthouse Point. We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity – with the appropriate environmental management plan in place.

Regarding wastewater, Disney Cruise Line follows all applicable laws and regulations. And while all Disney ships feature Advanced Wastewater Purification Systems (AWPS) that utilize natural processes to treat and purify onboard wastewater to levels far exceeding international shipping standards, and in some cases shoreside potable water standards, we do not discharge wastewater from vessels while at port. Additionally, Disney ships do not discharge ballast water in Bahamian waters.

The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs – considered to be in "fair" condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation efforts prior to construction will include translocating coral species, relocating barrel sponges, moving "minimally mobile" species, such as urchins, sea stars and sea cucumbers, and the potential use of fish habitat thruways to encourage natural passage of migratory and residential fish. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES (page 7-3).

The Walt Disney Company recently released its environmental goals for 2030, and has committed to achieving net zero greenhouse gas emissions by 2030. While powering cruise ships currently requires the use of fossil fuels, Disney Cruise Line is investigating a number of alternatives and is committed to collaborating with industry groups and investing in research and development for low carbon fuel innovation and technologies. As of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel and Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleetwide at all times, exceeding stringent international requirements. Additionally, Disney has three new ships under construction with delivery planned in 2022, 2024 and 2025 and these new vessels will have the potential to burn liquefied natural gas (LNG), one of the best options currently available to the marine industry. LNG yields a more than 20 percent reduction in carbon emissions and an 85-100 percent reduction in other emissions (e.g. sulfur, particulate, nitrogen oxide). Disney Cruise Line has further reduced emissions through technical and operational enhancements that include fuel use reduction technologies, modified propeller arrangements that create more efficient propulsion, modified itineraries, and increased shore power usage in ports that support this technology.

Disney has considered impacts to local air quality from emissions in our EIA and additional information may be found in Section 3.1.4.3 BOAT AND VESSEL TRAFFIC. In addition to currently using low-sulfur fuel, onboard incineration will not be conducted in port. The combustion products are exhausted through the stack, located at highest point of the ship. The stack height may range from 150 feet to 190 feet or more. Considering the time the vessel is at berth in a 24-hour day and exhaust discharge height and open air conditions, it is reasonable to conclude that there will be no adverse effects on the local air quality due to ship activity while at berth. Additionally, Disney has an internal policy to keep visible emissions below 20 percent opacity while in port, except for initial startup and shut down of engines.

As a result of these and other environmental efforts, Disney Cruise Line is consistently recognized as an industry leader on environmental issues and all four Disney ships have the U.S. Coast Guard's QUALSHIP 21 with Zero-E

designation, which recognizes exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating a commitment to environmental stewardship. Disney is often recognized for these efforts and regularly wins awards such as the Blue Circle Award for voluntary efforts to conserve energy and reduce emissions from Port of Vancouver.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #347265 Disney EIA for the Project at Lighthouse Point

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 4, 2021 at 11:32 AM	Mail	Kris Walker <kriskwalker@gmail.com>

### CCs

inquiries@depp.gov.bs <inquiries@depp.gov.bs>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
47	47	generallhpfeedback@disneycruise.com

**Kris Walker** May 4, 2021 at 11:32 AM

Dear Ms. Newbold,

We are long time second homeowners on Eleuthera and my husband's family has been visiting the island since 1947.

As the Director of DEPP, you have the distinct opportunity to help Disney create a model for destination stewardship on the island of Eleuthera; a model which could become the prototype for similar projects throughout the archipelago and beyond that provides economic stability, sustainable tourism and the protection of natural resources. Conversely, if not done well and thoughtfully and with the transparency of all stakeholders, the risk is supporting a model of what went wrong on Eleuthera with confluence of economic development, environmental protection and a public/private partnership in The Bahamas.

I am writing to express my concerns about the inadequacy of the **Disney Cruise Line's Environmental Impact Assessment (EIA) for their proposed cruise port at Lighthouse Point**. This is a major decision for the future of Eleuthera and The Bahamas; and a comprehensive, science-based EIA is essential to make a fully-informed decision about how to proceed at Lighthouse Point.

The EIA as it now stands is flawed and incomplete. Disney needs to conduct supplemental studies and consultations to address: The economic benefits of the project for Eleuthera and The Bahamas. The EIA currently does not provide any data or analyses to back up Disney's claims in this area. The Oxford Economics Study that supposedly supports these claims still has yet to be released.

- 1. Climate risks** to the project. The Bahamas is one of the most vulnerable nations to climate change and sea-level rise, but Disney's EIA does not consider these threats and how they might impact the long-term economic viability of the project.
- The fact that the waters surrounding Lighthouse Point have been officially proposed as a **Marine Protected Area (MPA)**, a designation based on extensive

scientific studies. Disney has said that their cruise port is compatible with a MPA, but their EIA provides **no evidence** that this is the case.

3. The impact of the development on the **critical migratory pathways** in the area for bonefish, groupers, sharks, and other commercially important species. The potential harm to the fishing industry of The Bahamas is **catastrophic**.

4. **The long-term environmental impacts of a tourism destination with 20,000 visitors a week**. The EIA currently only addresses the construction phase of the project, but fails to consider the impacts of long-term operation.

5. **Alternative developments**: Disney's current EIA mentions that other sites were considered for the project, but fails to consider alternative development options at the chosen site, as is standard practice for EIAs. Disney continues to point to the higher-density, greater-impact condo and marina proposal from 2008 as the only alternative to their cruise port, but this plan was abandoned more than a decade ago. **Disney's EIA ignores the land-based, sustainable alternative that has been proposed by local groups**. The EIA must analyze the potential for a lower-impact development to provide more jobs and better protect the environment.

6. **The threat of COVID-19 or future pandemics**. There is **no hospital** on Eleuthera, and the island has incredibly limited infrastructure. Cruise ships were one of the most heavily impacted industries by the pandemic. Disney's own cruise ships reported hundreds of cases of Covid-19 and even one fatality. Cruise ships are also linked to the spread of Covid-19 and to higher rates of infection in port employees and host island residents. The EIA must consider the potential impacts of Covid-19 and future pandemics at Lighthouse Point.

Disney has stated that their 'intent is to approach the Lighthouse Point project with the same level of environmental stewardship and sensitivity [it] bring[s] to other Disney projects around the world.' Yet multiple independent experts have reviewed the EIA and come to the same conclusion: The current EIA is filled with deficiencies.

I am writing to request that Disney withdraw its current EIA, conduct supplemental studies and consultations to adequately address the above issues, and resubmit a more comprehensive analysis. This is the only way that a well-informed decision about the future of Lighthouse Point, Eleuthera, and The Bahamas can be made.

Thank you for your attention.

Respectfully,

Kris and Bayard Walker

Double Bay, Eleuthera The Bahamas

Kennett Square, PA USA

*Darkness cannot drive out darkness, only light can do that. Hate cannot drive out hate, only love can do that.* MLKJr., Strength to Love, 1963

**Meghann Morris** June 29, 2021 at 10:14 AM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

The survey for marine resources, which included a focus on fish, can be found in the EIA Section 4.4.2.2, and a full species list of all species observed during marine assessments can be found in the EIA Appendix C - Baseline Marine Species List. While bonefish were not observed during the EIA surveys that to date have included over 400 hours of underwater surveys spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates

greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and increase overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation commitment.

The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 Boat and Vessel Traffic.

We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. Disney is also monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - Site Alternatives. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

The threat of COVID-19 or future pandemics is outside the scope of the EIA. That said, Disney Cruise Line consistently receives among the highest public health inspection scores. We also have a comprehensive plan that outlines protocols for preventing and managing illness and closely follow the guidance of public health officials. Our ships are equipped with doctors and nurses, as well as medical facilities that include isolation rooms, monitoring care, ventilators, oxygen, laboratory and pharmacy services. The ship's medical staff adheres to the requirements of the American College of Emergency Physician Health Care Guidelines for Cruise Ship Medical Facilities.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #347866 The plan submitted by Disney is not good enough

**Submitted** May 5, 2021 at 12:38 PM  
**Received via** Mail  
**Requester** Erin Cline <erinrcline@gmail.com>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - Bahamas LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 103  
**Time spent last update (sec)** 103  
**Original Recipient Address** bahamaslhpfeedback@disneycruise.com

**Erin Cline** May 5, 2021 at 12:38 PM

As you have not provided an email for non Bahama residents, instead leaving a blank card in the place of contact information, I think it's quite clear you are not actually interested in soliciting feedback. This is probably because Disney is aware that the plan they submitted is not good enough, and would never be accepted in the country Disney is registered as a company in. Attempting to work around the industry standards for their impact on the health of our planet by claiming their plan does not need to meet US standards is insulting. Do the right thing, submit a complete and appropriate plan to address the massive environmental impact you're attempting to push through.

**Meghann Morris** May 5, 2021 at 4:34 PM

Hello Erin,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

Those outside the Bahama's are able to contact us regarding the Environmental Impact Assessment for Lighthouse Point at [GeneralLHPFeedback@disneycruise.com](mailto:GeneralLHPFeedback@disneycruise.com), which is listed on our website at <https://lighthousepointbahamas.com/environmental-impact-assessment/>.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

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## #348644 Comments on Lighthouse Point

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 6, 2021 at 5:54 PM	Mail	Holly Lown <holly2525@sbcglobal.net>

**CCs**  
inquiries@depp.gov.bs <inquiries@depp.gov.bs>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
43	43	generallhpfeedback@disneycruise.com

**Holly Lown** May 6, 2021 at 5:54 PM

Please find my comments on the Disney EIA and my Letter to the Editor attached.

Regards,

Holly Lown Waters

**Meghann Morris** June 29, 2021 at 10:11 AM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection (DEPP).

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.

Regarding descriptions of the areas proposed for development and identification of marine and terrestrial species on site, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The biological features for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2, respectively. Additionally, a full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species Lists and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List. Furthermore, potential direct and indirect impacts to habitats are extensively outlined by habitat in the EIA Section 6.0 Identification and Assessment of Potential Environmental Impacts.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists. Based on

surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs – considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hard bottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hard bottom ecosystem. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

Similar to the marine resources investigation, terrestrial field investigations began with a literature search and discussions with representatives from local organizations, followed by landside surveys. During the surveys vegetative community types, as well as other land cover and land uses were characterized, and observations were made regarding the presence of birds and other animal species. All plant and animal species that were observed within the areas that are proposed for development are also present in the approximately 80% of the property where no construction is proposed. Disney has proposed mitigation for impacted areas that includes conservation and protection of a portion of the property where piping plovers have been observed (Bottle Bay); implementation of a bird monitoring program to monitor populations before, during and after construction; limiting clearing for all required areas to the immediate area necessary for development with surveys completed in advance; a conscientious effort to remove and/or control invasive non-native species that are listed in The Bahamas National Invasive Species Strategy, complemented by a landscaping program that uses a palette of native trees and shrubs to encourage native fauna visits; and the relocation of notable flora and/or fauna identified within the development footprint, if feasible, with requisite permits obtained from relevant Government agencies where appropriate.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - Site Alternatives. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

In keeping with the environmental due diligence, DCL has continued to evolve the project's design. For example, surveys identified a number of protected trees and some cultural ruins in the northwest area of the property. As a result, the structures originally planned for that area have been relocated to the eastern side of the property. Additionally, when bird surveys identified a small wintering population of endangered piping plovers at a location along the southern shore of the property, the design was adjusted to avoid that area. Likewise, it was determined that the pier could be narrowed, reducing the potential impact on the marine environment by approximately 25 percent.

The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in

ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

In response to your comment about scrubbers, as of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel. Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleetwide at all times. Disney Cruise Line does not use scrubbers, which is why this potential impact was not covered in the EIA.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 Boat and Vessel Traffic.

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Additionally, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management strategies to address any adverse changes we may see. Disney is also monitoring 36 benthic marine index sites in the surrounding area to account for any changes that may be the result of the project.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.

- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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May 6, 2021

Ms. Rochelle Newbold,  
Acting Director  
Department of Environmental Planning and Protection  
Charlotte House, 1<sup>st</sup> Floor  
Charlotte and Shirley Streets  
P.O. Box N-7132  
Nassau, Bahamas

Dear Ms. Newbold:

I am writing to express my concerns about the validity of the Disney Cruise Line's Environmental Impact Assessment (EIA) for its proposed cruise port at Lighthouse Point in Eleuthera. It is not a comprehensive, science-based EIA that is essential to make a fully informed decision on how to proceed at Lighthouse Point. This is a major economic and environmental decision for the future of Eleuthera and the Bahamas.

The current EIA is incomplete and fails to address the components required in a true EIA. Disney is circumventing national environmental policy standards that it would be held to under United States laws. They are:

- description **of** the action, including its need and benefits;
- description **of** the **environmental** setting and areas to be affected;
- **an** analysis **of** all **environmental** impacts related to the action;
- **an** analysis **of** reasonable alternatives to the action;
- identification **of** ways to reduce or avoid adverse **environmental** impacts.

A main purpose of an EIA is to examine the project and compare its benefits to alternatives. Disney only compared its proposal to a 2008 abandoned higher density, greater impact condo and marina plan. Disney failed to look at the land-based, sustainable alternative that has been proposed by local, Bahamian interests. The EIA must analyze the potential for a lower-impact development to provide more long-term, sustainable jobs and protect the environment.

The waters surrounding Lighthouse Point have been officially proposed as Marine Protected Area (MPA), a designation based on extensive scientific studies. Disney said its cruise port is compatible with a MPA, but its EIA provides no proof. The Lighthouse area is a critical migratory pathway for bonefish, groupers, sharks and other commercially important species. Yet, Disney failed to address issues in its presentation.

The Disney EIA does not address the climate risks of the project. The Bahamas is one of the most vulnerable nations to climate change and sea level rise. The International Council on Clean Transportation (ICCT) revealed that cruise ship scrubber discharges of the hot, acidic wastewater compound the impacts of climate change driven ocean acidification. The EIA does not address how the environmental impacts of this project will affect the long-term economic viability of the project. The hot acidic water also kills fish.

The long-term environmental impacts of a tourism destination with 20,000 visitors each week was not addressed in the EIA. It did not address the impacts of the long-term operation.

Disney stated that its “intent is to approach the Lighthouse Point project with the same environmental stewardship and sensitivity (it) bring(s) to other Disney projects around the world.” However, multiple independent experts reviewed the EIA and all agreed that the current EIA is filled with deficiencies. According to Dinah Bear, former Chief Counsel the U.S. President’s Council on Environmental Quality, “(the Disney EIA) does not conform to international and U.S. standards for EIA.”

Disney has failed to address the need and benefits of the project for Eleuthera and the Bahamas. It has not provided any data or analyses to support its claims. Disney claims the Oxford Economics Study supports Disney’s project but the study has not been released.

It is incomprehensible why the government of the Bahamas would allow the destruction of the pristine area of Lighthouse Point by a flawed and incomplete EIA.

Holly Lown Waters

27877 North Bradley Road

Lake Forest, Illinois

847-651-5104

Dear Editor:

I would like to address several matters, as the deadline nears for public comments on the Disney Environmental Impact Assessment (EIA) for their proposed cruise port at Lighthouse Point in Eleuthera.

Lighthouse Point is one of the most beautiful and pristine areas in the world. It is recognized by Bahamians, non-Bahamians, environmentalists and travel organizations world-wide as a place to visit and admire. The proposed Disney development will not result in environmental or economic stability for Eleuthera or the Bahamas.

Disney supporters challenged that many against the proposed project were non-Bahamian and these opponents should find another property to show Disney how sustainable development is done. Disney is a non-Eleutheran multi-national corporation that answers to its shareholders, not Eleutherans. Multi-national corporations have highly paid executives whose mission is to maximize profits for shareholders and the company while keeping costs down.

For example, according to Forbes, “Disney’s CEO Robert Iger is the highest-paid executive in entertainment, earning \$47.5 million—\$3 million in salary, a \$21.8 million bonus, \$10 million in stock awards and \$9.6 million in stock option—last year (2020) as Disney’s chairman and CEO. That is more than Disney paid for Lighthouse Point!

The future for economic and environmental sustainability requires Lighthouse Point to remain in the hands of Bahamians. The most attainable way to do this is to develop a National Park and rejecting the Disney Environmental Assessment.

According to [Smart Asset](#), in an essay titled, “The Economics of National Parks, “The economics of national parks isn’t just about the parks themselves. It’s also about the effects those parks have on the surrounding local economy.” For Eleuthera and the Bahamas, this means continued long term economic growth from entrance fees, touring fees, landscaping, restaurants, gift shops, car rentals, boat rentals, home rentals, and hotels.

This economic sustainability is not just for South Eleuthera but the entire island. Tour operators throughout the island could shuttle guests to the national park, stopping at local restaurants to provide lunch or boxed lunches. Along the way there is the opportunity for gift shops, food takeaways, etc. At Lighthouse Point, land and sea tours can be conducted.

The funds collected from all of this will stay in the Bahamas and will be paid to Bahamians. Not Disney shareholders or corporate executives.

Trip Advisor, a popular website used by travelers lists the top 10 Caribbean National Parks (Leon Levy in Eleuthera is one) and all the attractions, restaurants and excursions nearby. It also includes reviews and comments from travelers. This would be far more helpful to Eleutherans than having to be tours or attractions sanctioned by Disney.

Another National Park model to consider that has major appeal to eco-tourism is used in St. John Virgin Islands. At Maho Bay, eco campsites are rented that have low flush toilets, special faucets and showers to lower water consumption. Rainwater is collected for laundry and bathhouse areas. These eco-tents rent for \$130/night double occupancy. The site also has a restaurant, café, watersports center, grocery store and art center. How many permanent, full-time jobs would this create?

Once a national park is established, a national park foundation can follow. This allows for private donations at various levels. It enables corporate sponsorships. Grants and bequeathments can be made.

The Disney EIA did not consider alternative developments at Lighthouse Point, a standard international practice for EIAs. The current EIA should be withdrawn and more sustainable, Bahamian centric alternatives be considered.

Sincerely,

Holly Lown Waters

Lake Forest, Illinois

###

## #348827 BNT official response for Lighthouse Point EIA

**Submitted** May 7, 2021 at 9:17 AM  
**Received via** Mail  
**Requester** Shelley Cant <scant@bnt.bs>

**Status** Solved  
**Priority** Normal  
**Group** DCL Comm - Bahamas LHP Feedback  
**Assignee** Meghann Morris

**Total time spent (sec)** 85  
**Time spent last update (sec)** 85  
**Original Recipient Address** bahamaslhfeedback@disneycruise.com

**Shelley Cant** May 7, 2021 at 9:17 AM

To whom it may concern,

Please find attached the BNT's position on the Lighthouse Point EIA.

This has also been submitted directly to Director Newbold.

Thank you.



**Shelley Cant-Woodside**  
 Director of Science & Policy

Tel: (242) 393-1317 | Cell: (242) 424-8581 | [scant@bnt.bs](mailto:scant@bnt.bs)

[www.bnt.bs](http://www.bnt.bs) | The Bahamas National Trust. The Bahamas



@bahamasnationaltrust #exploreyourpark

**Meghann Morris** June 29, 2021 at 5:06 PM

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

As you are aware from the multiple meetings we have had with representatives of the Bahamas National Trust, we spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations like yours, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible –and that there will be no loss of marine or terrestrial biodiversity at a species level – with the appropriate environmental management plan in place.

We conducted surveys for reptile and amphibian species as part of the EIA. Brown Anole (*Anolis sagrei ordinatus*), and Bark Anole (*Anolis distichus dapsilis* and *Anolis distichus distichus*) were found and reported in the EIA. The whiptail and Cuban twig anole are also diurnal animals and were not found on standard surveys but we will continue to monitor and assess their presence moving forward. We agree night surveys are beneficial, but have focused first on the safety of our field survey teams given the conditions on-site. It is worth noting that even with night surveys, the boa, trope and blindsnake are cryptic and may not be detected. That said, the vast majority of the property will not be developed and contains intact biomes that would be habitat for these species. We can consider ongoing night-time surveys as part of our construction and operation environmental management plans once we can ensure the safety of our field teams to conduct those efforts.

As we have previously shared, current plans call for 16% of the property to be developed. We agree that vegetation composition in modified habitats is critical to determine what wildlife is supported. At Lighthouse Point, areas impacted by site development will be revegetated using a landscaping palette of native plants, with an emphasis on those plant species that provide food resources for birdlife. Consequently, while it will take time for this vegetation to fully mature, revegetated habitats will provide the resources needed to support the birdlife referenced in the EIA as preferring less dense areas. Through our terrestrial monitoring program, we have established a baseline of the avian community diversity in areas to be developed, and we will be able to assess how that birdlife responds to revegetated areas following construction. Based on our findings, we will adaptively manage revegetated habitats to maximize their conservation value to LHP wildlife.

Thank you for making us aware that one out of multiple references to the Cuban tree frog wrongly identified it as "non-native." We will ensure that is corrected in the EIA.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by AGRRA-certified biologists. This information may be found in the EIA section 4.2.2 MARINE RESOURCES (page 4-89). A full species list of all flora and fauna observed during marine assessments at the site can be found in the EIA in Appendix C, Baseline Marine Species List (page C-1). Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier, 0.145 acres of individual corals could be potentially impacted. Mitigation efforts prior to construction will include translocating coral species, relocating barrel sponges, moving "minimally mobile" species, such as urchins, sea stars and sea cucumbers, and the potential use of fish habitat thruways to encourage natural passage of migratory and residential fish. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES (page 7-3)

Our conservation team is focused on restoration with a vision of improving the marine ecosystem at Lighthouse Point. We don't anticipate that we will have an impact on the local seagrass/algae community based on our findings but will continue to monitor and understand if restoration can be a beneficial tool to our ongoing conservation efforts, including rehabilitating reefs that will involve corals beyond the Acropora species.

We are also focused on the plans for beach expansion and have experience with this type of work at Disney's Vero Beach Resort in Florida. We will be able to best inform in the EMP with our approach to how we source sand sustainably, protect and/or restore the dune and coastal vegetation communities, and leverage the latest science to conduct this work in a way that minimizes the need for ongoing renourishment. These plans would include a focus on ensuring a native plant community, protected from Guests, which can stabilize the dune and prevent erosion.

Our HOA outlines that subject to proper permits, the project will be permitted to obtain sand to enhance, improve and maintain beaches. The sand will be subject to the reasonable and customary fees charged by Government. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Beach expansion is planned to occur landward of the foredune, and placement of sand is planned at or above the mean high-water line. Geological studies have indicated that LHP beaches are stable and sand movement is not significant. To further reduce the possibility of any unanticipated sand accumulation, we are also incorporating flushing thruways into the engineering design of shore perpendicular structures. This should allow sand, water and fish to move along shore unimpeded.

Guests, employees, and citizens and residents of The Bahamas will have access to most of the 13,600 linear feet of sandy beach at Lighthouse Point. It is likely that wrack line removal as part of beach maintenance will affect shorebird foraging behavior. However, birds will have other areas on the property, including the north-half of east beach (4,675 linear feet) and the northwest portions of the property (1,100 ft), where wrack line removal will not occur to help maintain an environment for natural shorebird feeding. A portion of the point on Bottle Bay where piping plovers have been consistently observed will be protected with buffers to prevent disturbance. We will incorporate a piping plover conservation program into the EMP.

#### Additionally per the EIA: 7.7 WASTE REMOVAL AND COASTAL CLEANUP

The accumulation of flotsam, jetsam, debris and other litter that washes onto shore will be dealt with through an ongoing waste management program and regular coastal cleanups will provide adequate refuse collection points

and continued monitoring of shoreline for marine debris washed ashore within the Project area. This will also include marine debris generated during storm events.

Disney has a long history of commitment to communities in The Bahamas and to the conservation of natural resources in the region. Since 1995, the Disney Conservation Fund (DCF) has distributed more than \$100 million through grants to support research and conservation projects led by various non-profits and educational institutions worldwide. The DCF has always focused its philanthropy on programs that work alongside communities to find solutions that benefit both people and wildlife with a focus on inspiring the next generation of conservation leaders.

Disney has a strong conservation record in The Bahamas, awarding approximately \$4 million in grant funding to more than 20 organizations working in the region since 1997 including Bahamas National Trust, Bahamas Education Culture and Science Foundation, and The Nature Conservancy. While support has directly funded both Bahamian and international conservation organizations, all programs are evaluated on their strategies to support local partners and communities in protecting wildlife and habitat. Many funded international organizations engage local Bahamian organizations in these efforts.

Disney is currently supporting a multi-year initiative to reverse the decline of coral reefs across The Bahamas led by the Perry Institute for Marine Science through their Reef Rescue Network. The Reef Rescue Network is a partnership that includes many partners, including eight Bahamian led-conservation organizations or businesses with the goal to keep adding more. We agree with the importance of community-led conservation and supporting local conservation organizations and local conservationists in this work. As well, Disney has engaged a number of Bahamian biologists, master birders, and environmental scientists in the research and field investigations for the EIA, as referenced in Section 13 of the EIA, and our effort to engage even more Bahamians and Bahamian-owned organizations and businesses across all aspects of the project will continue throughout development and operation of Lighthouse Point.

Our offer to further discuss the EIA with the Bahamas National Trust beyond the meetings we've already had remains. We look forward to working with the people of Eleuthera, the Government of The Bahamas, and collaborating organizations to determine how the donated lands can provide the greatest value for Eleuthera's communities and natural resources.

Thank you.

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## #348987 Lighthouse Point - Perspective from a FORMER Disney fanatic

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 7, 2021 at 12:50 PM	Mail	Kelly Arkles <karkles@gmail.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
52	52	generallhpfeedback@disneycruise.com

**Kelly Arkles** May 7, 2021 at 12:50 PM

To whom it may concern:

I will start this communication by pleading with you to PLEASE change your plans for Lighthouse Point. Do NOT create a private cruise port here. Rehabilitate elsewhere and keep this natural wonder as untouched as possible and accessible to all. Help to make it a national park. Your EIA is severely lacking in proof that you will take care of this fragile and magnificent natural wonder.

Disney, with this plan, you have shattered the heart of this former long-time fan. Anyone who has known me since childhood will attest that my two loves were Disney and dolphins. As the years passed, I found my third love in the Family Islands of the Bahamas. It was a crushing day and the last of my fanship for you when I learned that you are planning to (what I and many others believe) DESTROY Lighthouse Point with a private cruise port and a plan to develop commercially in a way that has absolutely nothing to do with Bahamian culture as you claim. My biggest heartbreak, that you will be removing access to the southernmost tip and the epicenter of its beauty and spirit to everyone but Disney guests AND perpetuating development that I believe will do more harm to our environment than good.

### Background

I will try to keep this short as possible in hopes that anyone there with a heart who wishes to read this can do so quickly:

- I started going to Disney World as a baby. Back when it was only the Magic Kingdom. I was a baby on my dad's back carrier when I apparently first screamed at the ghost mirrors in the Haunted Mansion.
- I have been to Disney World at least 12 times in my life. I broke away from my senior year spring break trip to Daytona to get there, got ENGAGED there, and was able to, at 2 different times, experience the newfound joy of each of my nieces as they visited for the first time.
- Before I even had 2 pennies to rub together, I found every means possible to purchase every single Disney Christmas ornament I could find. They were my pride and joy, I spent YEARS collecting them and it was a tree that I put my heart and soul into. Every year on the day after Thanksgiving, I would carefully unwrap each and every ornament with such profound joy.
- When other kids were singing into their hairbrushes as make-believe stars, I had an old office phone with multiple line buttons where I would pretend and dreamed of being a reservationist at Disney World helping other families to have the same joy as I had always experienced.
- My wedding cake was specifically designed to have embossed Mickey Mouse head silhouettes and I spent months finding just the right Mickey and Minnie cake topper.

My point in the above...I LOVED you! And the above doesn't even scratch the surface. But with this plan, you are taking away every single bit of love I once had. My memories will always still bring joy but I will now regret Disney being a part of them. All Disney items have been packed away in many many boxes and it hurt to even bring out items to include in pictures I have included below. If this goes through, all items, forever tainted.

I am guessing this will all fall on deaf ears and I accept that. I have to take this chance and hope someone there cares. If you could see it the way I do, you would realize that you have an opportunity here to make a significant change. One that would bring back not only my love for Disney but others as well...change your plans for

Lighthouse Point. You have all the resources to be a guiding light in these times where conservancy is of major importance to this planet. With my strong environmental beliefs, yes, do I wish all cruise lines would go away...for sure. I am not asking that here. I am asking you to help make Lighthouse Point a national park where it is accessible to the world and a beacon of hope that big corporations can make a difference for everyone and not just their stakeholders. I am asking you to rehabilitate another location for your ships and show the world how doing so will protect future generations. I am asking you to help Bahamians take control of their resources and truly profit. I am asking you to put your brilliant and creative collective minds together and take a stab at a true eco-friendly land-based destination open to the world that can still fulfill your financial responsibilities to your shareholders. Work with Bahamian environmentalists and make a difference.

**Please, Disney, reconsider.**

Including some pics from my life that once included Disney.









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Thank you!

Kelly Arkles

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**Meghann Morris** May 10, 2021 at 5:05 PM

Hello Kelly,

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity – with the appropriate environmental management plan in place.

In addition, this project will create much needed economic opportunities for local residents. This not only includes the quality jobs that will be created during construction and operation, but also the purchase of Bahamian goods and services and the opportunities for Bahamian ownership that the project will create. This property was for sale for several years and the previous owners had received approval on plans that would have been far more impactful to the site. There is always a delicate balance between sustainable economic development and protecting the environment and we have accomplished that with our plans.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #349011 Comments on Lighthouse Point EIA

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 7, 2021 at 1:18 PM	Mail	Angelique Hjarding <ahjardin@uncc.edu>

### CCs

Angel Hjarding <angel@hjarding.com>, inquiries@depp.gov.bs <inquiries@depp.gov.bs>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
52	52	generallhfeedback@disneycruise.com

**Angelique Hjarding** May 7, 2021 at 1:18 PM

Please see the attached comment letter in response to the EIA for the proposed DCL Lighthouse Point Project. Thank you for your consideration.

Sincerely,

Angelique Hjarding

Angelique Hjarding, PhD (she/her/hers)  
 Postdoctoral Researcher, Charlotte Action Research Project  
 Department of Geography & Earth Sciences  
 University of NC at Charlotte  
[ahjardin@uncc.edu](mailto:ahjardin@uncc.edu)

**Meghann Morris** June 29, 2021 at 9:46 AM

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (approximately 1,600 to 2,900 per day). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 Boat and Vessel Traffic.

We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.

Wastewater is addressed in the EIA Section 3.1.3.3 – Wastewater Collection, Treatment and Disposal. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant (WWTP) that will be constructed in accordance with standard design and permitting requirements to provide treated water consistent with public access reuse requirements. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored.

The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

Regarding biodiversity, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species List and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the

proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and increase overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation commitment.

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA), coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs – considered to be in "fair" condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation elsewhere in The Bahamas. A monitoring program will

also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 Marine Reptiles. Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. There have been no observations of sea turtle nesting activity and the team has received no reports of turtle nesting at Lighthouse Point. That being said, Disney has more than 15 years managing nesting sea turtles at Disney's Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting in the world. Disney is a permitted organization through FWC and the work is conducted under Marine Turtle Permit #260. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney's Vero Beach Resort, which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <https://myfwc.com/license/wildlife/marine-turtle-permit/>. If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.

Disney has a long history of commitment to communities in The Bahamas and to the conservation of natural resources in the region. Since 1995, the Disney Conservation Fund (DCF) has distributed more than \$100 million through grants to support research and conservation projects led by various non-profits and educational institutions worldwide. The DCF has always focused its philanthropy on programs that work alongside communities to find solutions that benefit both people and wildlife with a focus on inspiring the next generation of conservation leaders. Disney has a strong conservation record in The Bahamas, awarding approximately \$4 million in grant funding to more than 20 organizations working in the region since 1997 including Bahamas National Trust, Bahamas Education Culture and Science Foundation, and The Nature Conservancy. While support has directly funded both Bahamian and international conservation organizations, all programs are evaluated on their strategies to support local partners and communities in protecting wildlife and habitat. Many funded international organizations engage local Bahamian organizations in these efforts. As noted, Disney is currently supporting a multi-year initiative to reverse the decline of coral reefs across The Bahamas led by the Perry Institute for Marine Science through their Reef Rescue Network. The Reef Rescue Network includes many partners, including eight Bahamian led-conservation organizations or businesses with the goal to keep adding more. We agree with the importance of community-led conservation and supporting local conservation organizations and local conservationists in this work. Disney has engaged a number of Bahamian biologists, master birders, and environmental scientists in the research and field investigations for the EIA and our effort to engage even more Bahamians and Bahamian-owned organizations and businesses across all aspects of the project will continue throughout development and operation of Lighthouse Point.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.

- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - Site Alternatives. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species Lists and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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9201 University City Blvd, Charlotte, NC 28223-0001  
t/ 704.687.2201 www.uncc.edu

To: Disney Cruise Line  
Bahamas Department of Environmental Planning and Protection

Re: Lighthouse Point EIA

May 7, 2021

To Whom It May Concern:

I am writing this letter as a conservation science and environmental planning researcher who has visited and explored the natural wonders of The Bahamas for more than 20 years. In addition to my personal connection to The Bahamas, I am currently working in partnership with the Bahamian led organizations Young Marine Explorers and Cat Island Conservation Institute on several projects including one in Northern Cat Island that is just to the south of the proposed DCL Lighthouse Point project. As a professional environmental planner with a vested interest in the long-term outcomes of this project, I have spent a significant amount of time reviewing and discussing the EIA for the proposed project and wanted to share my findings and thoughts. This project is at a critical point and all decisions made going forward will not only impact the areas immediately around Lighthouse Point in South Eleuthera but will also impact neighboring communities and ecosystems to the south in Cat Island.

The Bahamas Department of Environmental Planning and Protection has stated that this project will move forward unless **egregious environmental concerns** are identified. I have identified several areas of concern with the EIA and project proposal that I believe should be considered egregious and I request that you pause moving forward with the project development until further evaluation of these and any additional issues considered to be egregious environmental concerns can be addressed.

Of primary concern are the potential impacts of additional cruise ship passengers to the area of the development, impacts to the proposed Marine Protected Areas, current gaps in biodiversity monitoring, proposed alternatives, and Bahamian focused conservation investments.

## **1. Impacts of additional cruise ship passengers**

### *1. Human impacts to water*

The EIA does not address the potential impacts of 10-20,000 people every week swimming and recreating in the waters around Lighthouse Point. For examples, what will be the impact of those people wearing sunscreen that is not considered to be reef safe on the reefs? What will be the impact of human disturbance to wildlife from experiences and excursions?

### *2. Human waste*

The EIA addresses how some solid waste from food and other sources will be handled. What it does not address is how human body waste will be managed. This is a major problem when on a weekly basis there will be more visitors to South Eleuthera than live on the entire island. A clearer understanding of how human waste will be processed is needed.

## **2. Impact to Proposed Marine Protected Areas**

### *1. Ship passage lanes*

Ships will go through or travel in close proximity to two proposed marine protected areas, Lighthouse Point and the North Cat Island. These proposed MPAs are not acknowledged in the EIA. The only mention of protected areas is in section 4.2.3 (p. 4-136) where the EIA states there are no MPAs or national parks presently designated in the area of the development. What will be the impact of additional ships every week passing through these waters that are currently part of a proposed but not adopted MPA? These waters and reefs are already impacted from ships traveling to existing cruise ports of call in the area, Princess Cay and Half Moon Cay. Additional studies are needed to evaluate the impacts.

### *2. Constructed and groomed beaches*

The EIA does not address the potential long-term impacts of constructed beaches on the surrounding ecosystems. There is a significant potential for the imported sand to erode and smother surrounding reefs and marine habitats.

## **3. Gaps in biodiversity monitoring**

The EIA acknowledges there are gaps in knowledge about the presence of endangered and threatened sea turtles, recreationally important bone fish, and extent and diversity of coral species present in the immediate and near areas of the development. Additional studies are needed, including extensive conversations with local fishers about the biodiversity and economic value of the Lighthouse Point marine area.

#### 4. Proposed alternatives and conservation investments

1. *Alternative development options*

The EIA does not provide sufficient alternatives for land development that may be more environmentally and economically sustainable for the Lighthouse Point area. Several organizations have proposed alternatives for consideration. One such alternative is the Cat Island Biosphere Reserve. The Cat Island Conservation Institute is currently working in partnership with the Government of The Bahamas and UNESCO on the phase 1 plan for a Biosphere Reserve that would be located in northern Cat Island immediately to the south of the proposed DCL Lighthouse Point development. This would include the North Cat Island MPA and there is an opportunity to consider what it would look like to bring the Lighthouse Point MPA into the reserve as well. This could provide significant positive economic and environmental impacts for the communities on both islands. It would also be interesting to discuss what a partnership with DCL on a project like this would look like.

2. *Partner with and invest in Bahamian led conservation organizations*

DCL has partnered with several world class conservation organizations such as the Perry Institute of Marine Science on conservation projects in The Bahamas. To truly do community conscious conservation, Disney and DCL must partner with and invest in Bahamian led conservation organizations. There is amazing work being done by conservation organizations based in The Bahamas and through this project, Disney has the opportunity to be a leader in shifting how global conservation is done by investing in the Bahamian conservation practitioners and researchers that live, work, and play in the waters and islands near the proposed Lighthouse Point project.

3. *Require reef safe sunscreen for all cruise passengers*

The impacts to reefs and marine life from the chemicals in sunscreen is well studied and it is known to be one of the causes of coral bleaching. When tourists enter the water with sunscreen that is not considered to be reef safe, it washes off their skin and into the water. Thousands of weekly cruise passengers wearing sunscreen not considered to be reef safe into the water is a major threat to the sensitive coral reefs that surround the proposed DCL Lighthouse Point development. To address this DCL should prohibit non reef safe sunscreen on board your ships, additional education focus for passengers on the importance of reef safe sunscreen, and only sell reef safe sunscreen in shops on board the ship.

I am part of the generation of scientists that was inspired by Disney's nature documentaries and have passed that love of nature and Disney on to my children. In addition to being a huge fan of all things Disney, I understand the appeal of cruising and have always considered DCL to be the best of the best. Pre-pandemic, we had talked many times about taking the kids on one of the Star Wars Day at Sea cruises. Now, seeing this project from a professional perspective and all of the flaws in the current EIA, if DCL pushes through with the project without any

adjustments or reevaluation, my image of Disney will be forever tarnished and instead of seeing Disney as the company that stands above all the rest, you will now be no better than any other cruise line looking to make a profit. The Disney magic will be gone.

I ask you from both a professional and personal perspective, please consider pausing the process of development and review some of the issues and alternatives presented here and by others. If the Disney magic is truly alive, this project will be something special for everyone. Including Nemo and his friends.

Sincerely,

A handwritten signature in cursive script that reads "Angelique Hjarding".

Angelique Hjarding  
Postdoctoral Researcher  
Department of Geography and Earth Science  
University of North Carolina Charlotte  
Charlotte, NC  
[ahjardin@uncc.edu](mailto:ahjardin@uncc.edu)  
mobile: 704-718-0928

## #349027 Longtime Bahamian Tour Operator's feedback

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 7, 2021 at 1:46 PM	Mail	Bahamas Out Island Adventures <tom@bahamasadventures.com>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - Bahamas LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
46	46	bahamaslhpfeedback@disneycruise.com

**Bahamas Out Island Adventures** May 7, 2021 at 1:46 PM

Good day Disney Cruise Lines

I've now been in the tourism business in the Bahamas beginning in 1997 and in Eleuthera continuously since 2005.

My wife and I own and operate one of the top-rated tour businesses on the island - Bahamas Out Island Adventures. I've run tours to Lighthouse Point only sometimes, we based in the north, but visit myself and often hear tourist's experiences visiting LHP.

Almost unanimously tourists are quite strongly against the proposed cruise ship port that Disney Cruise Lines is planning.

The change and impact that will result will be disastrous to the reefs and marine life, to the terrestrial life and to the spiritual well being of all life.

There's just nothing to say other than it is too special of a place to turn it into the site you propose.

We will continue to fight and indeed plan to boycott any and everything associated with Disney if it proceeds and will continue to communicate to tourists to do the same.

The economic impact will be negative to that part of the island and in fact the whole of Eleuthera as so many have said they will avoid that part of the island and some the entire island.

I know it was privately owned and the sale was legitimate but Disney could actually show they are environmentally minded by doing a project that does not involve huge ships landing thousands of passengers.

It's a spiritual blow to not only our island, but also our planet.

I could have broken down various mistakes in the EIA, but I know it's obvious to all involved that landing that many people and docking giant ships off an area so pristine will result in degradation of the environment there.

Please help Save Lighthouse Point and Save Disney's reputation as a steward of the environment

Tom Glucksmann

12428094653

**Meghann Morris** May 13, 2021 at 3:00 PM

Hello Tom,

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity – with the appropriate environmental management plan in place.

The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by biologists.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs – considered to be in "fair" condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. Other species of high value and select motile invertebrates may also be considered for translocation. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Currently we have ornithologists surveying to obtain baseline bird population and behaviors. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. Disney is also monitoring 36 benthic marine index sites in the region to account for any changes that may be the result of the project.

Regarding economic impact, an economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP.

One of Disney's guiding principles for development at Lighthouse Point is to create economic opportunities for Bahamians. Through our Heads of Agreement with the Government of The Bahamas, Disney has committed to:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.

- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and trainings. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

More facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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## #349284 Disney EIA Review

<b>Submitted</b>	<b>Received via</b>	<b>Requester</b>
May 7, 2021 at 7:39 PM	Mail	Nikita Shiel-Rolle <nikita@ymebahamas.org>

### CCs

inquiries@depp.gov.bs <inquiries@depp.gov.bs>, Rwnewbold <rwnewbold@depp.gov.bs>

<b>Status</b>	<b>Priority</b>	<b>Group</b>	<b>Assignee</b>
Solved	Normal	DCL Comm - General LHP Feedback	Meghann Morris

<b>Total time spent (sec)</b>	<b>Time spent last update (sec)</b>	<b>Original Recipient Address</b>
23	23	generallhpfeedback@disneycruise.com

**Nikita Shiel-Rolle** May 7, 2021 at 7:39 PM

To whom it May concern:

We ask that you please consider these remarks in regards to the egregious environmental concerns and gaps in the DCL Lighthouse point Project.

Kind regards,

Nikita Shiel-Rolle  
 Cat Island Conservation Institute  
 Disney EIA Review Fianl- CICI (1).pdf

**Meghann Morris** June 29, 2021 at 5:11 PM

Hello, Nikita.

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent three years working hand-in-hand with a team of highly qualified and experienced scientists, wildlife ecology specialists, professional engineers, and construction experts on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and there will be no loss of marine or terrestrial biodiversity at a species level - with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.

Field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for marine resources can be found in the EIA Section 4.2.2. A full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with

representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Disney has substantial experience working with corals and reef systems in The Bahamas and has a 90% success rate in moving corals in the Abacos. We agree that *Diadema* play a critical role in improving coral reef health. In fact, our coral restoration efforts there focus extensively on translocating native *Diadema* to help protect coral from algae growth. This is addressed in the EIA Section 7.2.1 CORALS. We are using this knowledge to develop comprehensive coral monitoring programs to inform any adaptive management or reactive strategies that may be used at Lighthouse Point. The Environmental Management Plan (EMP) will include ongoing monitoring of coral health in the area and outline strategies to respond to any adverse environmental conditions that are observed over time. Additional potential protective procedures and mitigation are identified in the EIA Section 7 - Proposed Mitigation Measures. Despite over 400 hours of dive surveys around Lighthouse Point, we found *Diadema* but rarely in numbers greater than 2 per meter which is suggested for effective breeding populations. That being said, encouraging sustainable *Diadema* populations would be part of the reef management plan as it is on the sites in the Abacos.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over "the Bridge," which, as you know, extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

Data on whales and dolphins can be found in the EIA section 4.2.2.7.1 Cetaceans (page 4-132 – 4-133). Construction noise impacts are addressed in the EIA Section 6.2.1.6 – CONSTRUCTION NOISE IMPACTS and EIA Section 6.2.1.8.1 – NOISE LEVEL AVOIDANCE DURING CONSTRUCTION. The noise level associated with pile driving varies significantly depending on the equipment utilized, the overall size of the piles, the substrate into which the piles are driven, the force applied, and the distance to the source but we recognize construction noise has the potential to impact marine mammals in the area. Therefore, we will employ standard techniques for marine mammal protection during construction in the marine environment, which are consistent with U.S. standards. To address this during construction, we will work with SMRU Consulting, the world's leading marine mammal consultancy trained to assess and mitigate any potential impacts to marine mammals due to development, to determine impact zones, soft start construction strategies, and employ visual observation that will be in place to ensure construction noise is halted when marine mammals are in the area. It is not believed this will impact dolphin or whale migration in the long run.

Regarding marine noise once operational, as previously shared, Disney Cruise Line vessels will utilize shipping lanes already used by other commercial ships and use by Disney ships is not expected to significantly impact this area in the context with other ship traffic. During operation we will work with consultants to train vendors and staff on proper strategies to help protect marine mammals and monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

To provide further clarity, The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line.

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

We are designing Lighthouse Point with onsite solar panels and batteries to provide 90% of electricity needs. Project initiatives include:

- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution

- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

On waste, the site will be zero waste to landfill. The goal is to minimize any waste that comes onto the site in the first place. The primary waste generated will be organic waste, which will be treated with a biodigester. Project initiatives include:

- Reusable dishware with fully compostable accessories when single-use items are needed
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

For water, we are not withdrawing any water, and making water on the island using mostly renewable electricity. We will have a water treatment system on site and will use reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. Project initiatives also include low-flow water conserving fixtures in all restrooms

We will continue to refine the performance of the operation and will install meters throughout the island to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

As for your comments on the Blue Economy, we could not agree more. Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

Additionally, Disney has a long history of commitment to communities in The Bahamas and to the conservation of natural resources in the region. Since 1995, the Disney Conservation Fund (DCF) has distributed more than \$100

million through grants to support research and conservation projects led by various non-profits and educational institutions worldwide. The DCF has always focused its philanthropy on programs that work alongside communities to find solutions that benefit both people and wildlife with a focus on inspiring the next generation of conservation leaders.

Disney has a strong conservation record in The Bahamas, awarding approximately \$4 million in grant funding to more than 20 organizations working in the region since 1997 including Bahamas National Trust, Bahamas Education Culture and Science Foundation, and The Nature Conservancy. While support has directly funded both Bahamian and international conservation organizations, all programs are evaluated on their strategies to support local partners and communities in protecting wildlife and habitat. Many funded international organizations engage local Bahamian organizations in these efforts.

As you are aware, Disney is currently supporting a multi-year initiative to reverse the decline of coral reefs across The Bahamas led by the Perry Institute for Marine Science through their Reef Rescue Network. The Reef Rescue Network includes many partners, including eight Bahamian led-conservation organizations or businesses with the goal to keep expanding and offering new opportunities to support local capacity-building in conservation. We agree with the importance of community-led conservation and supporting local conservation organizations and local conservationists in this work.

Disney has engaged a number of Bahamian biologists, master birders, and environmental scientists in the research and field investigations for the EIA, which are listed in Section 13 of the EIA, and our effort to engage even more Bahamians and Bahamian-owned organizations and businesses across all aspects of the project will continue throughout development and operation of Lighthouse Point. We would be happy to learn more about your work and the Young Marine Explorers initiative as we continue to explore opportunities to support a blue economy that benefits the people and biodiversity of The Bahamas.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

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**8.0 ATTACHMENT E: QUESTIONS RECEIVED THROUGH DCL BAHAMAS EMAIL**

## **Morris, Meghann E.**

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 9:17 AM  
**To:** vsradman@gmail.com  
**Subject:** Lighthouse point project concerns

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans.

Over the past few years, we have responded to numerous letters from the organizations you referenced. We have taken relevant feedback into consideration as we developed our EIA. In February 2020, we met with a senior advisor to the group and reviewed our plans. In addition, we shared a link to the EIA with the groups on the day it was posted on our website, March 10, 2021, and offered to discuss it further with them after they had time to review it. We did not receive a response to that offer. We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.

As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line. While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.

While pandemic-related issues are not within the scope of the EIA, Disney Cruise Line has among the highest public health inspection scores and has developed a multi-layered approach to dealing with COVID-19 and other illnesses onboard. Since our cruises to The Bahamas generally originate from the U.S., the ships must adhere to stringent U.S. Centers for Disease Control guidelines. Our ships are equipped with doctors and nurses, as well as medical facilities that

include isolation rooms, monitoring care, ventilators, oxygen, laboratory and pharmacy services. The ship's medical staff adheres to the requirements of the American College of Emergency Physician Health Care Guidelines for Cruise Ship Medical Facilities. Additional human health and safety issues, including pandemic-related issues, will be addressed as part of the Environmental Management Plan.

Social justice issues are also not within the scope of the EIA. That said, the Walt Disney Company is committed to diversity and inclusion and, given the events of the past year in the U.S., we have further strengthened this commitment. For Lighthouse Point specifically, Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training, and a portion of the funding will be used for small business grants. Additionally, the design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artist from Eleuthera and Antonius Roberts, a master artist from Nassau, are anchoring Disney's efforts as we work with local artists, historians and creatives in The Bahamas. We have also engaged Bahamian scientists and environmental experts as part of our survey and monitoring effort on-site, with a long-term focus on supporting local conservation leadership.

More facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**From:** Vanessa Radman <[vsradman@gmail.com](mailto:vsradman@gmail.com)>  
**Date:** Sunday, April 25, 2021 at 3:50 PM  
**To:** DCL Bahamas <[DCL.Bahamas@Disney.com](mailto:DCL.Bahamas@Disney.com)>  
**Subject:** Lighthouse point project concerns

To whom it may concern,

After recently learning about the Lighthouse Point project and discovering more about the proposed plan, I must express that I vehemently oppose this project if it does not done in a collaborative effort with local groups that have been reaching out to you for years.

It is clear that this project would take place in the middle of an area that is proposed to be a protected marine area and therefore any projects conducted in this area should be responsible, sustainable, and resilient. After spending three years developing the EIA it is deeply concerning why groups like Reearth have not been engaged or consulted during this planning phase.

It is also evident from petitions such as *Stop Disney - Last Chance for Lighthouse Point* that 443,290 people (as of this email) are equally concerned that the EIA does not adequately address issues of climate change, COVID (and other potential virus outbreaks), and systemic injustices.

As a consumer and Disney fan, I must say that I'm extremely disappointed that the initial planning of this project was done without proper involvement of the local communities, environmental groups and activists. And I will no longer partake in being a consumer of Disney products including ending my subscription to Disney+, purchasing products, or visiting parks should this project move forward without consultation of these groups.

I ask that you do the right thing and be a leader in this area instead of being another culprit.

Thank you,  
Vanessa Radman

## Morris, Meghann E.

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 9:04 AM  
**To:** 'seetheworld2222@gmail.com'  
**Subject:** Lighthouse

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

Disney was not involved in the Treasure Island facility referenced. The facilities were owned and operated by Premier Cruise Lines, Ltd., and any decisions regarding the management or development on the island were made by Premier Cruise Lines.

Disney has a long-standing relationship with The Bahamas that has spanned more than 20 years. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay, a private cruise destination in Abaco, for more than 20 years. Disney's proposed plan to develop and operate Lighthouse Point expands on our commitment to The Bahamas and we are making a significant investment with this project; however, a decommissioning plan will be included as part of the Environmental Management Plan required by Government.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also engaged with numerous stakeholders throughout Eleuthera, The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. A list of meetings held is included in the EIA Section 13 which highlights the many times Disney met with local stakeholders on Eleuthera. These efforts continue today.

As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

More facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

On 4/29/21, 8:15 PM, "Barbara J. Godbout" <[seetheworld2222@gmail.com](mailto:seetheworld2222@gmail.com)> wrote:

You already ruined one island, Treasure Island in Bahamas, you refuse to meet with local people regarding your development and your development will damage the environment.

Club med left the island after a hurricane. Learn from them.

Just say no.

## Morris, Meghann E.

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 9:22 AM  
**To:** marjiefindlay@bluetaxi.org  
**Subject:** Lighthouse Point

Hello, Marjie.

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.

Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored. Additional information will be provided in the Environmental Management Plan, the second phase of this process as outlined in Bahamian laws and regulations.

The survey for marine resources, which included a focus on fish, can be found in the EIA Section 4 4.2.2, and a full species list of all species observed during marine assessments can be found in the EIA Appendix C - Baseline Marine Species List. While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. gorensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the

recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and increase overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation commitment.

Disney Cruise Line's commitment to The Bahamas began before our first ship even set sail. When operational, 75% of our cruises call on The Bahamas and Disney has operated Castaway Cay, a private cruise destination in Abaco, for more than 20 years. Disney's proposed plan to develop and operate Lighthouse Point expands on our long-term commitment to The Bahamas and the investment we are making there is significant. However, a decommissioning plan will be included as part of the Environmental Management Plan required by Government.

Regarding economic impact, an economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report will be published in the Public Consultation Report on the project website.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to

The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

More facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**From:** Marjie Findlay <[marjiefindlay@bluetaxi.org](mailto:marjiefindlay@bluetaxi.org)>

**Date:** Friday, May 7, 2021 at 4:50 PM

**To:** "[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)" <[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)>, DCL Bahamas <[DCL.Bahamas@Disney.com](mailto:DCL.Bahamas@Disney.com)>

**Subject:** Lighthouse Point

Dear Bahamian Government and Disney,

As an American who has had a house on Eleuthera for over 50 years, I am very upset and embarrassed that my country would take advantage of a smaller, Bahamian country and treat them so poorly and without the respect that they deserve. In the history of Disney, this will go down as an environmental disaster and another example of systemic racism and corporate greed. The EIA would never pass anywhere in the US. The Lighthouse Point Partnership Plan was never given adequate consideration. It was a plan based on the belief that Bahamians could build an environmentally and economically sustainable development combining preservation of LHP and small scale development by and for Eleutherans. The profits were to stay in the Bahamas. Disney should at least come up with a plan that echoes their 2021 environmental values. They

should come up with an alternate pro-environment plan for the site or go to another island and remediate a site.

1) Disney had inadequate answers to many questions at their town meeting, ie; when asked what was their management plan for the human waste of 20,000 people a week on the island, they replied that they were studying it. How can an EIA be passed when there is no waste management plan in place?

2) Fish studies: Everyone that has ever been to Lighthouse Point knows that there are bonefish there. Similarly, all fisher people know that The Bridge is a huge migratory passage and that local fishermen make their livelihood on those fish. The cruise port is going to negatively affect the livelihood of many Eleutherans and increase food insecurity on the island. (Please listen to the expert from Woods Hole about the effect on the fish and coral on the second environmentalists meeting)

3) Has the Bahamian government been given a guarantee that if Disney leaves Lighthouse Point, they will remove all traces of being there and leave it pristine...and remove the bridge as it is a hazard?

4) The Bahamian government needs to respect itself and stand up. The Bahamas and Bahamians deserve better. The economic benefit to the Bahamas is pathetic compared to the economic benefit to Disney Cruise Lines.

Needless to say, I could go on and on. I hope but wonder if anyone will even read this. I hope someone in the Bahamas will, please!

I hope the Bahamian government will reconsider their position in light of an insufficient EIA and that Disney will reconsider their plan and do something good instead of this destructive plan.

Thank you for reading, Marjie Findlay, Eleuthera and MA

**9.0 ATTACHMENT F: QUESTIONS RECEIVED THROUGH DEPP EMAIL**

## Morris, Meghann E.

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 9:29 AM  
**To:** 'willisw@mercersburg.edu'  
**Subject:** Disney Lighthouse Beach EIS Comment

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as "the Bridge," which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the EMP will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

Regarding marine noise once operational, Disney Cruise Line vessels will utilize shipping lanes already used by other commercial ships and use by Disney ships is not expected to significantly impact this area in context with other ship traffic. During operation we will work with consultants to train vendors and staff on proper strategies to help protect marine mammals and monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts. Data on whales and dolphins can be found in the EIA section 4.2.2.7.1 Cetaceans (page 4-132 – 4-133). We recognize construction can cause temporary impacts to local marine mammals within the direct area. Therefore, we will employ standard techniques for marine mammal protection during construction in the marine environment which are consistent with U.S. standards. With this in mind, we have contracted SMRU Consulting, the world's leading marine mammal consultancy trained in the interface between marine mammals and construction.

Regarding noise impacts landside, guest noise is anticipated and we will work to manage this by controlling access. Guests will only have access to designated areas within the site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC. Furthermore, it is expected any impacts on surrounding habitats from generator noise would be limited. The generators will be located within an enclosed building and will be designed and operated in a manner such that they are not a noise nuisance or other concern for nearby employee facilities or adjacent residents.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (approximately 1,600 to 2,900 per day). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.

Regarding the inland bodies of water, no dredging or filling is proposed for the inland salt ponds. Variable-width buffers will be enforced around the salt ponds and the only activities proposed to be undertaken within the buffers are upgrades to the existing road, in line with Disney's Heads of Agreement with the Government of The Bahamas, and the development of a nature trail in the vicinity of Big Pond (EIA Figure 6-1). We will have a plan in place as part of the Environmental Management Plan to ensure ongoing monitoring that will allow us to adjust our strategies should any impacts be seen.

Completion of the EIA is the first phase in what is a multi-step process for development approval. The Environmental Management Plan is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**From:** Will Willis <[willisw@mercersburg.edu](mailto:willisw@mercersburg.edu)>  
**Sent:** Saturday, 17 April 2021 8:09 pm  
**To:** DEPP Inquiries <[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)>  
**Subject:** Disney Lighthouse Beach EIS Comment

Greetings,

I have been to Lighthouse Beach before with students of mine, and it is an amazing place to visit; one of the most beautiful beaches I have ever seen. Disney was wise to purchase it, but in my review of the Environmental Impact Statement (EIS), it seems that it is inadequate for a few reasons.

First, I did not see any deep assessment of the impact of having the ships coming and going regularly. In seeing what has happened at some other island facilities run by cruise lines, it would seem that the ships would definitely affect water quality (turbidity, fuel getting into the water, etc.), coral survival, and habitat alteration.

Second, I did not see mention of the effects of SPF lotion on the corals and other wildlife.

Third, there would certainly be an impact in terms of noise pollution.

Fourth, the sheer number of visitors would stress the island's ecosystem. Sure, some of the species are hearty, given that they have had to evolve over time to survive storms, but they have not evolved for the influx of people, trash, and vehicles.

Fifth, the inland bodies of water have got to be sensitive to change, and I cannot believe that the proposed development would not have an effect on them with its close proximity.

I am not an expert in EISes, but it seems that there are many items that are not adequately addressed and/or are not present at all.

Also, is it not the case that an EIS must be accompanied by an environmental mitigation plan (EMP) to be worth considering, since it is not only necessary to acknowledge the entirety of environmental impacts, but also to address what Disney might do to avoid or remedy them? In doing so, people might feel more comfortable that proper measures are being taken.., but in the absence of a truly comprehensive EIS, much less an accompanying and satisfactory EMP, it seems to me that allowing any development to proceed would be to risk irreversible damage. I think that is the intent of an EIS, and for this reason, I would encourage the government to ask Disney to provide a more thorough EIS, as well as an EMP, before making any decisions in favor of development.

I appreciate you considering my comments,  
Will Willis

## Morris, Meghann E.

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 10:06 AM  
**To:** dclaridge@bahamaswhales.org  
**Subject:** Lighthouse Point EIA

Thank you for your letter concerning potential impacts of marine mammals in the surrounding waters of Lighthouse Point.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Thank you for bringing the unintentional duplication of two species to our attention. We have corrected this and invite you to share information about the missing species you referenced. We welcome you to share any data you have with us that would enhance our management practices moving forward to the benefit of local marine mammals.

Data on whales and dolphins can be found in the EIA section 4.2.2.7.1 Cetaceans (page 4-132 – 4-133). We recognize construction can cause temporary impacts to local marine mammals within the direct area. Therefore, we will employ standard techniques for marine mammal protection during construction in the marine environment, which are consistent with U.S. standards. With this in mind, we have contracted SMRU Consulting, the world's leading marine mammal consultancy trained in the interface between marine mammals and construction. Environmental Managers will monitor for dolphins and whales within the area whenever in-water construction is occurring and will have the ability to stop construction based on their distance from the activity, which will be established by SMRU Consulting. Also, the project will use soft starts, which ramp up the noise over time to give the animals time to avoid the area. It is not believed this will impact dolphin or whale migration in the long run.

Marine surveys to detect the presence of species were conducted as part of the EIA and no marine mammals were observed prior to the EIA being submitted. Even though they were not seen during the present/absent transects, we are assuming the species listed in the EIA may be in the area. With that in mind, Disney has continued to monitor for marine mammals during continued monitoring and coral survey trips (one juvenile *Mesoplodon densirostris* was seen during the last trip in May 2021). We have also deployed acoustic monitors to determine the presence and frequency of species. This data is currently being analyzed and will be shared with SMRU Consulting and used to inform future decisions and best practices.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over "the Bridge," which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

Additional information about our mitigation plans will be included in the Environmental Management Plan, which is the second phase in this process as outlined in Bahamian laws and regulations.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**BAHAMAS MARINE MAMMAL RESEARCH ORGANISATION** P.O. BOX AB-20714, MARSH HARBOUR, ABACO, THE BAHAMAS  
(242) 366-4155 office (242) 357-6666 mobile www.bahamaswhales.org @bmmro

Mrs. Rochelle Newbold, Director  
Department of Environmental Planning and Protection  
Charlotte House  
Nassau, The Bahamas  
May 7, 2021

Dear Director Newbold,

I have read the marine mammal sections of the Disney EIA and have the following comments:

The Bahamas Marine Mammal Research Organisation (BMMRO) has been collecting occurrence records for marine mammals in The Bahamas since 1991, including some data from southern Eleuthera. Note that BMMRO's marine mammal records were made available to Waypoint Consulting Ltd., but not for their exclusive use, and they decided not to request a summary report. As such, the species list presented in Table 4-13 is incomplete and has 2 species listed twice. Also note, that BMMRO has only conducted one dedicated vessel survey in Exuma Sound so much of our data have been provided through public sightings.

Our records show that the coastal waters around south Eleuthera and the deep-water environments in Exuma Sound provide habitat for a high diversity of marine mammal species. Of particular note, is the high number of sightings of many deep-diving oceanic species in the near-shore slope habitat along southwest Eleuthera, some of which (e.g., beaked whales) are known to be vulnerable to underwater man-made noise. The most frequent species sighted were coastal bottlenose dolphins (28% of all records), beaked whales (22%), sperm whales (10%) and short-finned pilot whales (9%).

The species list in Table 4-13 is incomplete and has 2 species listed twice.

The abundance of species reported in the area is currently unknown but BMMRO's long-term studies off southern Abaco Island has found small populations of coastal bottlenose dolphins and Blainville's beaked whales with limited home ranges. Globally, sperm whales and manatees are listed as vulnerable species while the population status of many of the deep-diving species is currently unknown and listed as data deficient.

All marine mammal species are protected against harm in The Bahamas under the Bahamas Marine Protection Act 2005. To address the impacts of the proposed development as well as develop effective mitigation measures to limit its impacts, dedicated surveys around southern Eleuthera are needed to determine species distribution and identify important habitat and to estimate their abundance and population status.

The types of field studies needed include visual and acoustic surveys to record species presence and absence and estimate abundance. Assessing the status of prey species and potential impacts of the proposed development are also important. Given the duration of the project development, it is disappointing that such studies were not conducted.

In fact, the EIA provides extremely limited information about their mitigation plans to limit disturbance to marine mammals, especially potentially resident populations of beaked whales. It appears that the plan has not yet been developed which is unacceptable at this late stage of this project. The pile driving and pier construction is the greatest concern.

Given these concerns about lack of information for marine mammal occurrence from the area and lack of a detailed mitigation plan, as well as the presence of critically endangered birds, protected plant species, and the sensitive nature of the southeastern Eleuthera habitat (including wetlands), BMMRO does not support the development as proposed, and recommends the EIA be revised to address these concerns.

Sincerely,

Diane Claridge, PhD

[dclaridge@bahamaswhales.org](mailto:dclaridge@bahamaswhales.org)

As part of the EIA public comment process for Lighthouse Point the Department of Environmental Planning and Protection (DEPP) received a duplicate form letter approximately 11,000 times. The form letters were submitted through Friends of the Earth and were identical in content. The response to the questions and concerns in the letter is as follows.

**Morris, Meghann E.**

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 10:16 AM  
**To:** 'kgill@foe.org'  
**Subject:** Help protect vital coastal ecosystems

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection.

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

Per Bahamian laws and regulations, completion of the EIA is the first phase in what is a multi-step process. The Environmental Management Plan (EMP) is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Per the process outlined by The Bahamas Department of Environmental Planning and Protection (DEPP), the EMP is not submitted until after the EIA is accepted by Government. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity. As with the EIA, DEPP will oversee the public review process of the EMP.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.

We will continue to refine the performance of the operation and will install meters throughout the island to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

Baseline data and impacts for the project are well documented in the EIA. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial

assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.

The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA), coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

A detailed analysis of benthic resources including corals within the footprint of the marine facilities has been completed in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as "the Bridge," which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management strategies.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

The threat of COVID-19 or future pandemics is outside the scope of the EIA. That said, Disney Cruise Line consistently receives among the highest public health inspection scores. We also have a comprehensive plan that outlines protocols for preventing and managing illness and closely follow the guidance of public health officials. Our ships are equipped with doctors and nurses, as well as medical facilities that include isolation rooms, monitoring care, ventilators, oxygen, laboratory and pharmacy services. The ship's medical staff adheres to the requirements of the American College of Emergency Physician Health Care Guidelines for Cruise Ship Medical Facilities.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

-----Original Message-----

From: Kiran Gill <kgill@foe.org>  
Sent: Monday, 19 April 2021 3:42 pm  
To: DEPP Inquiries <inquiries@depp.gov.bs>  
Subject: Help protect vital coastal ecosystems

Dear Bahamas Dept. of Environmental Planning & Protection,

I write to oppose the approval of any Disney Cruise Line development at Lighthouse Point on Eleuthera based on the current Environmental Impact Assessment (EIA).

Numerous independent experts have reviewed Disney's EIA and state that it is an unacceptable document and is filled with gaps and oversights. This is a major decision for the future of Eleuthera and The Bahamas. Disney and the government need a comprehensive and science-based EIA in order to make an informed decision about such a major project.

The EIA has major omissions including:

- The EIA ignores serious "climate risks" from the project, even though The Bahamas is one of the most vulnerable nations to climate change and sea-level rise.
- The EIA identifies a number of significant impacts to wildlife but does not mention any potential measures to avoid or mitigate those significant impacts.
- The EIA does not even mention that the waters surrounding Lighthouse Point are so rich in marine life that they have been officially proposed as a "Marine Protected Area".
- The EIA lacks any meaningful study of vital migratory pathways around Lighthouse Point for important species, including bonefish, groupers, and sharks.
- The EIA fails to consider the environmental impacts of 20,000 visitors a week to its proposed day resort — it only addresses the construction of the project.
- The EIA fails to detail the number of ships that will dock at the proposed development annually or what Disney's plans are for increases in the number and size of ships in the future.
- The EIA asserts that the project will have many economic benefits for Eleuthera and The Bahamas, but doesn't provide any data or analyses to back up these claims.
- The EIA doesn't address the threat of COVID-19 or future pandemics, which is critical considering Eleuthera's limited infrastructure and lack of a hospital.

Please require Disney to withdraw the current EIA, conduct additional studies and consultations to fill these gaps, and submit a new draft EIA. Thank you for the opportunity to comment.

Sincerely,  
Kiran Gill  
CHarlotte, NC 22193

## Morris, Meghann E.

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 10:29 AM  
**To:** 'goreau@globalcoral.org'  
**Subject:** Global Coral Reef Alliance comments on Lighthouse Point EIA

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We understand your concerns that about biodiversity and fisheries impacts and completely agree that decisions must be made using high-quality data, taking into consideration the entire ecosystem. We have spent three years working hand-in-hand with a team of highly qualified and experienced scientists, wildlife ecology specialists, professional engineers, and constructions experts on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and there will be no loss of marine or terrestrial biodiversity at a species level - with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included, among others, use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by AGRRA-certified biologists.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in "fair" condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted. AGRRA surveys by independent groups were also performed on deeper reefs on the Atlantic side of Lighthouse Point in 2016 and 2018 to determine suitability of an MPA and found a similar rating of "fair" with percent cover of live coral averaging <6% across 11 sites. [Bahamas coral reef report cards (2016, 2020)]

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. Disney has substantial experience working with corals and reef systems in The Bahamas and has a 90% success rate in moving corals in the Abacos. We are using this knowledge to develop comprehensive coral programs to inform any adaptive management or reactive strategies that may be used at Lighthouse Point. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts. Additional potential protective procedures and mitigation are identified in the EIA Section 7 - Proposed

Mitigation Measures. These measures will also be discussed in greater detail in the Environmental Management Plan, the second step in this two-phase process outlined by Bahamian laws and regulations.

Important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Independent scientists have studied the area and have not found aggregations off the point. Fishers report the nearest aggregation being halfway between Lighthouse Point and Little San Salvador. We recognize inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and increase overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation commitment.

Our proposed development of Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA) and a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. The report that proposes new MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover. We believe we have an opportunity to improve the marine environment through restoration efforts, including moving much of the approximately 1/10 of an acre of coral the project may impact, which will support coral breeding and recovery success. Coral recovery efforts will be expanded through the establishment of a long-term coral nursery and other initiatives.

Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

The conceptual beach enhancements are based on locally observed conditions, discussions with local Eleutherans working with the field crew during the EIA site investigations and engineering analyses. The beach/swimming areas will be located where natural sand beaches currently occur along the south, southwest and southeast coasts (north of the actual point). All these areas are relatively stable sand beach areas that naturally hold and accrete sand. To increase the beach usage area, guest beach areas will be expanded landward, and new sand will be placed on the upland where needed. The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures, consisting of low-lying native rock and material, will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. This can be seen in the EIA Figure 3-1, the Lighthouse Point Illustrative Concept Plan. This will also be addressed in the Environmental Management Plan and through any other relevant Government permitting processes.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will adjust our approach to ensure we protect the local biodiversity. Disney is also monitoring 36 benthic marine index sites to monitor coral, benthic, and fish communities in the region to account for any changes that may be the result of the project.

Wastewater is addressed in the EIA Section 3.1.3.3 – Wastewater Collection, Treatment and Disposal. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting requirements to provide treated water consistent with public access reuse requirements. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored.

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Proposed construction of pile placement will be rock socket drilling and placement of pile and placement of any structure will have local effects that we believe are accounted for within the 75-foot buffer already mentioned. The sand surveyed beneath the trestle and berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions. Moreover, we anticipate only minimal accumulation of fine sediments to the seafloor in the ship berthing area during the construction phase of the Project as there will be no dredging. While the expectation of turbidity related impacts to fish and corals are unlikely in this area, turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation. Additional information on proposed mitigation efforts for marine resources may be found in the EIA section 7.2 MARINE RESOURCES.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**May 6, 2021**

**REVIEW OF DISNEY CRUISE LINES ISLAND DEVELOPMENT EIA  
FOR LIGHTHOUSE POINT, ELEUTHERA, BAHAMAS**

**To: The Bahamas Department of Environmental Planning and  
Protection**

**Thomas J. F. Goreau, PhD**

**President, Global Coral Reef Alliance**

**Bahamian coral reefs have never been in worse condition since the first good underwater photos were taken in the Bahamas in 1948 by my grandfather and father.**

**First underwater closeup photograph, F. W. Goreau, Bahamas, 1948 Lighthouse Point's coral reefs have many unique features, not discussed in the EIA, that require the highest possible protection from land-based sources of pollution, such as those that would be created by proposed activities at the site.**

Lighthouse Point has some of the least damaged coral reefs in the Bahamas and pristine salt ponds of global importance as migratory bird habitat (from EIA).

Due to their location at the extreme southern end of Eleuthera, sticking out into clean ocean waters thousands of meters deep, these are the only coral reefs in Eleuthera that are entirely up-current from sources of land-based pollution, and therefore of the highest national conservation importance.

Lighthouse Point sticks out into clean deep Atlantic water, and is upcurrent from all human influence because currents and waves approach mainly from the southeast.

The EIA describes the health of Lighthouse Point coral reefs as “fair”, because live coral cover was about 1-10%, but the survey omitted all the areas of highest coral cover in deeper water on the east side of Lighthouse Point. Because of their exceptional water quality and lack of human disturbance, these reefs are likely among the most pristine reefs left in the Bahamas. Coral reef organisms may go to record depths there because of the clear water. Lighthouse Point is certainly the major grouper spawning site in Eleuthera because it has all the features groupers look for: a promontory sticking out into deep water, exposed to waves, with currents flowing up both sides, allowing baby groupers to spread up both coasts. Whales and dolphins also pass by the Point. It is therefore of critical fisheries importance, although not identified as such in the national environmental protection plan. Lighthouse Point was designated for Protected Area status in the national Environmental Marine Protection Plan, but this recommendation has not been established or enforced.

Lighthouse Point was designated a Proposed Marine Protected Area in the 2018 Bahamas Environmental Marine Protection Plan, for establishment by 2020. It has not yet been established or enforced. Because Lighthouse Point sticks out into the wind and waves, it is strongly exposed on both sides to hurricane waves there is only a narrow sand beach. Shore and offshore areas have hard limestone bottom with a thin shifting sand layer. During hurricanes some sand is thrown up on land, forming dunes, but most is washed out to deep water and lost. For this reason, there is not enough beach sand there to accommodate the number of tourists planned by the developers! Their solution is to import sand and dump it above the high tide mark to create artificial beaches on both sides of Lighthouse Point. There is not enough sand locally to dredge or pump to the site. They do not say where this sand will be brought from, nor whether it will be transported by barge or truck, and then spread by bulldozers. Schematic plan for dumping sand above the high tide mark to create artificial beaches on both sides of Lighthouse Point, with stone structures on either side to keep them in place. Overhead view. Note living coral reefs right in front of the artificial beach. From the EIA. Plan for dumping sand above the high tide mark to create artificial beaches on both sides of Lighthouse Point, with stone structures on either side to keep them in place. Side view. Coral reefs in front of beach are not shown. From the EIA.

A unique feature of Lighthouse Point is the fact that all three of the severely endangered *Acropora* elkhorn and staghorn coral species are found together in very shallow nearshore waters, right in front of the proposed artificial beaches.

Location of shallow elkhorn and staghorn reef in front of proposed artificial beaches (+ symbols). From EIA, with red circles added to show how close they are to sand dumping for artificial beaches. Elkhorn and staghorn corals used to be the most common corals in all clean shallow Bahamian coral reefs, but have almost vanished, and are very rarely now found together anywhere. These species provide the best shoreline protection from waves and the best fish habitat because they are the fastest growing Caribbean corals. These corals require the cleanest waters and good water movement by waves to survive, and are the first to disappear where waters become muddy from dredging and soil erosion, or polluted with nutrients. These species are especially vulnerable to sand from dredging. Once water quality deterioration kills these species, fisheries collapse and beaches wash away, a process far advanced in the developed islands of the Bahamas and Caribbean. In addition, they are especially vulnerable to coral diseases, and were the first

species to be largely killed off by diseases throughout the entire Caribbean. Lighthouse Point is therefore of exceptionally high quality for the most endangered Bahamian reef building coral species, and deserves the strongest protection from any activities that would cause turbidity or nutrient inputs in coastal waters. Three planned activities are described in the EIA that would greatly damage water quality at this site: 1) nutrient discharge to coastal waters from sewage, 2) turbidity caused by boat docking, and 3) erosion of landfill beaches onto the reef.

1) A proposed waste water treatment plant is described, but almost no details are given. It is not clear if sewage will be treated to tertiary level to remove the nutrients, which if discharged into groundwater or surface waters will cause harmful algae blooms that will overgrow and kill corals and sea grasses, and choke migratory bird habitat with slimy weeds. The description of algae found on the reef make it clear that high nutrient-indicating fleshy algae are absent from the reefs, and the algae present are mostly coralline algae that produce white beach sand. Nutrient inputs will cause “bad” algae that produce no sand to overgrow and kill “good” sand producing algae. This stops new supplies of sand to make up for that which is lost to storms, while weedy algae overgrowth smothers the corals that protect the beach from wave erosion, increasing erosion. The EIA suggests that sewage plant effluent waste water will be recycled to irrigate lawns and ornamental plants, but it is impossible to prevent this soaking into the sea and damaging near shore reefs and sea grasses. No geotextile layer to prevent discharge into the sea is mentioned in the Lighthouse Point EIA, and they were found not to work in a major project at Bakers Bay, Abaco, whose developers claimed that all waste water would be recycled by irrigating golf courses that were sealed off below with geotextile to prevent leakage to the aquifer and ocean. Despite these claims, in fact nutrients leaked into the sea at Bakers Bay and caused harmful algae blooms and diseases that killed most of the corals on nearby coral reefs (<https://www.globalcoral.org/golf-courses-kill-coral-reefs-and-fisheries-harmful-algae-blooms-and-disease-caused-by-nutrient-runoff-from-golf-course-development-on-guana-cay-abaco-bahamas/>). I have personally seen reefs all around the Caribbean killed this way for more than 60 years, including New Providence, Grand Bahama, and Abaco, and appeal to Bahamians not to let this happen to one of their Crown Jewel National Marine Treasures, the coral reefs at Lighthouse Point, Eleuthera. Coral reefs killed by golf course fertilizers and sewage at Bakers Bay, Abaco. The same is true in New Providence and Grand Bahama.

2) Disney Cruises use an innovative design that causes no dredging for cruise ship pier installation, because dredging has caused terrible damage to reefs at cruise ship destinations all across the Caribbean. However, the strong directional jets created during ship movements while docking and leaving port stir up sediment and leave clouds of fine-grained sediment to drift over coral reefs downcurrent. I advised the Turks and Caicos Island Government Department of Environment and Coastal Resources (DECR) national coral reef health assessment. We found corals on reefs kilometers down-current from the cruise ship pier on Grand Turk being killed by sediments suspended by propeller wash from cruise ships docking and leaving. Before the pier went in, that reef was the last good shallow snorkeling coral reef we could find in TCI with corals in healthy condition. DECR was forced to rescue and transplant thousands of corals that were being killed by sedimentation caused by cruise ships, and move them onto artificial reefs in clear water up-current from the pier. I have seen the same effects in Cozumel and other cruise ports around the Caribbean. Bahamian corals have had large scale mortality from repeated high temperature bleaching events, and are on the edge of survival from global warming. Warm water, heated by the engines from the directional jets on the cruise liners, will add additional stress to corals down-current. These engines must be on all the time while the cruise ship is at dock in case the wind suddenly shifts, as long familiar to Bahamian sailors! The EIA says thermal impacts will be small if there are good currents, but they could make the difference between life and death for corals under calm conditions. Impacts will be inevitable to reefs downcurrent from the dock to the north west of Lighthouse Point despite EIA claims there will be no effect.

3) A major threat to the offshore reefs is being buried when the artificial beach created by sand dumping on the shore is washed into the sea by storm waves. Global sea level rise and increasing storm strength caused by global warming make this inevitable. These beaches are naturally narrow because of strong windward exposure orientated into the waves, the narrow shelf, hard flat limestone

bottom, and fact that most of corals are in deep water at the edge of the drop off. A large amount of sand is produced by coralline algae, but most is washed away into deep water, so the area is generally starved of sand, with only a very thin veneer of mobile sand over hard limestone rock. Sand placed above the high tide mark will be unstable in the long run. Some will be washed onto the sand dunes by storm waves and wind, but eventually most will be washed into the sea and lost over the edge of the drop off into deep water. Corals between the shore and the reef edge will be buried and killed by eroded beach sand. Erosion of beach dredge-fill sand dumped on South Florida beaches (called "beach renourishment"), killed all the inshore coral reefs that once lined the coast of Southeast Florida. If the goal is to keep the emplaced sand on the beach for cruise ship passengers, they will need to grow coral reefs to protect them from erosion, or make artificial ones. In South Florida all of the coral reefs that used to lie offshore and provided and protected the sand that built the natural beaches were smothered and killed when beaches were widened by sand dumping. Sand was washed offshore by the first storms. Since Florida lost both sand source and protection, they ever since have needed to dump more and more sand. The sand dumped never lasts out the year, and much is lost to deep water! Now no more dredge-able sand remains in South Florida, and they want to import it from the Bahamas. The same will happen at Lighthouse Point, where the artificial beach could be wiped out in the first hurricane or Norther, and kill all the shallow elkhorn and staghorn reefs in front of them, as happened to Florida in the 1970s. Shallow reefs (circles), grouper spawning sites (X), and deep reefs with high coral cover and diversity (dashed line) will be affected. Quite apart from the fact that the artificial beaches will damage the coral reefs when they are washed away, every cruise ship that enters or leaves the pier will send a cloud of suspended sediment over the corals down-current. The best remaining snorkeling reefs in the Turks and Caicos Islands were smothered kilometers down-current by dredging and cruise ship sediment plumes. This will also happen at Lighthouse Point.

Grand Turk cruise ship pier. Coral reefs kilometers down current were smothered by sedimentation. Every cruise ship that enters and leaves sends a plume of mud onto the reef. The same will happen at Lighthouse Point, but the area affected will be larger than Grand Turk because the site is more exposed to longshore wave driven currents. I congratulate authors of this EIA for the exceptionally complete job they made describing the site and the species found there, despite incomplete studies due to Covid. Their thorough descriptions allowed offshore ecological conditions of the site to be determined, even though missing from the analysis in the EIA itself, and even though they avoided looking at the best coral reef areas. For example, the EIA says that no reef fish spawning aggregation sites exist in the area that could be impacted, and that the nearest one documented is around 30 miles away, but this is probably because no detailed studies have been made there. Lighthouse Point is certainly a major breeding aggregation site for groupers and other fish, because what they look for is a submarine headland pointing out into deep water, and Lighthouse Point is probably the top grouper spawning site in Eleuthera for both coasts of the island. In conclusion this proposed development risks severe ecological damage to unique Bahamian coral reefs and fisheries of national conservation importance through sewage causing harmful algae blooms, turbidity caused by cruise ships, and erosion of artificial beach sand unprotected from storm waves. Both sides of Eleuthera will be affected if Eleuthera's best reefs are damaged by this environmentally irresponsible proposal.

Impacts of this project will damage both sides of Eleuthera. Please note I have received no money for review and comment on the 551 page EIA. My comments are motivated by what is best for Bahamian coral reefs and fisheries and not by any financial benefit such as received by the highly paid teams that produced this EIA.

## **Morris, Meghann E.**

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**From:** DCL Bahamas  
**Sent:** Thursday, July 1, 2021 10:39 AM  
**To:** azaletaprm@gmail.com  
**Subject:** Concerns about the Disney Lighthouse Point EIA

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

### **Climate Change**

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

Initial emissions estimates were completed before the design of the island was complete. The initial estimates of 3,100 metric tons CO<sub>2</sub> per year were based on achieving the minimum requirements from Disney's Heads of Agreement with the Government of The Bahamas, which required the project use at least 30% renewable energy.

The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line. In line with these goals, Lighthouse Point is expected to meet 90% of its electricity needs with renewable energy sources and to send zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.

We will continue to refine the performance of the operation and will install meters throughout the project site to allow us to monitor and optimize our actual operational performance as we introduce guests to the new island destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate.

### **Grouper**

Regarding your question about marine resources, our investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

### **Visitation**

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (approximately 1,600 to 2,900 per day). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

### **Environmental Management Plan**

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well. For more information, we encourage you to visit the website for The Bahamas Department of Environmental Planning and Protection.

### **Covid-19**

While pandemic-related issues are not within the scope of the EIA, Disney Cruise Line has among the highest public health inspection scores and has developed a multi-layered approach to dealing with COVID-19 and other illnesses onboard. Since our cruises to The Bahamas generally originate from the U.S., the ships must adhere to stringent U.S. Centers for Disease Control and Prevention guidelines. Our ships are equipped with doctors and nurses, as well as medical facilities that include isolation rooms, monitoring care, ventilators, oxygen, laboratory and pharmacy services. The ship’s medical staff adheres to the requirements of the American College of Emergency Physician Health Care Guidelines for Cruise Ship Medical Facilities. Additional human health and safety issues, including pandemic-related issues, will be addressed as part of the Environmental Management Plan.

### **Scrubbers**

Disney Cruise Line does not use scrubbers, which is why this potential impact was not covered in the EIA. As of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel. Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleet-wide at all times.

### **Marine Protected Area**

The Bahamas has not approved the area around Lighthouse Point as a Marine Protected Area (MPA). That said, our development as proposed at Lighthouse Point is compatible with the establishment of a multi-use MPA. In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

### **Coral**

The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. Nonetheless, we acknowledge that there may be some additional erosion of these enhanced beaches particularly during large storm events that may cause impacts to adjacent beach areas.

We will pay special attention to the southeast beaches (Lighthouse Point and Telescope beaches) where sensitive corals occur within 150 feet of the beach. These areas already have fairly high levels of sedimentation and sand movement, which limits live coral growth to elevated surfaces and reef edges. Sedimentation and coral conditions will be monitored on these and other inshore sensitive areas during construction and operation of the facility. Should sedimentation stress to sensitive inshore corals become apparent, management actions will be taken to mitigate against these impacts. Adaptive management actions may include removal of any accumulated sediments from nearshore corals following storms and other additional beach stabilization measures to minimize further erosion.

We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.

### **Meetings**

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. See EIA Section 13 for a list of meetings.

### **Economic Impact Study**

An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney's project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report will be published in the Public Consultation Report on the project website.

Direct economic impacts are outlined in Disney's Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: "The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project..." Among the commitments outlined in the document are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney's commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood

For Lighthouse Point specifically, Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera.

#### **Crown Lease**

As for understanding the seabed lease for Lighthouse Point, please refer to Appendix I as part of the EIA Section 1.3.

Thank you.

**From:** azaleta - p.r., marketing, advertising and photography <[azaletaprm@gmail.com](mailto:azaletaprm@gmail.com)>

**Sent:** Thursday, 6 May 2021 7:23 pm

**To:** DEPP Inquiries <[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)>

**Subject:** Concerns about the Disney Lighthouse Point EIA

TO: [inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)

Dear DEPP -

Below are my concerns regarding the Disney EIA

May 6, 2021

Disney's EIA - TO DEPP Bahamas

My concerns:

1. **The Disney EIA DOES NOT confirm to International or US standards for an EIA.** - According to many experts including Dinah Bear, former General Counsel at the US

President's council on environmental quality. Bahamian experts and environmentalists also agree. We need to listen to the experts. DEPP - Please represent well.

Were Bahamian scientists and environmentalists given the opportunity to have their voices heard as strongly as they should have been heard? They along with the Island School have asked Disney for a voice at the table to share conversations for a better and more sustainable plan. They have not had the opportunity. Disney said they would not go ahead with the proposed plans IF the EIA is not sustainable. There are so many gaps in the EIA. Experts are saying it is not.

**Q: Does the Disney EIA confirm to Bahamian Standards?**

**Q: Is DEPP and the Bahamas government going to accept an EIA that does not meet US or International standards?**

**2. A big issue is Climate Change.** Disney said that the project will not have a material impact on climate change. The EIA was completed pre-Hurricane Dorian. **I am concerned that the current EIA from Disney does not take into consideration enough on an important subject like CLIMATE CHANGE and how it might impact South Eleuthera. After Hurricane Dorian - we need to be more diligent about development that changes tides, affects sea levels and could pose a threat to the residents of South Eleuthera.**

According to the article/report below: "This has caused significant changes, including ocean warming, acidification, deoxygenation and sea level rise, with severe impacts on ocean and coastal life and the lives and livelihoods of coastal communities."

Climate Change - Hurricane Dorian was the most powerful storm on this side of the earth. If we get another storm like that in South Eleuthera, what will happen?

The UN said that urgent climate change is needed to protect the world's oceans.

[https://unfccc.int/news/urgent-climate-action-is-needed-to-safeguard-the-world-s-oceans?fbclid=IwAR1Vjgl98cJtCkKJ6PM4rlGWKD8G3-sXRmO7BEa\\_rmnAqzf6p\\_mFoiwvzwuU](https://unfccc.int/news/urgent-climate-action-is-needed-to-safeguard-the-world-s-oceans?fbclid=IwAR1Vjgl98cJtCkKJ6PM4rlGWKD8G3-sXRmO7BEa_rmnAqzf6p_mFoiwvzwuU)

**Q: Do you think that the Disney s project has a material impact on climate change?**

**Q: What are the greenhouse gas emissions from this project?**

### **3. The Grouper Species**

**I think that the Grouper Species and population will be impacted.** Disney said that there are no grouper spawning sites or places that need to be protected. Reports from local fishermen state that there is a Nassau Grouper Spawning aggregation within 15 miles of Lighthouse Point (LHP).

A visit to Sandypoint, South Abaco a few years ago and speaking with the fisherman there - they said that their fishing livelihood was affected by the current developments that took place in So. Abaco as well as Disney's Castaway Cay. Did the Cruise ship visits contribute to this factor? How will fishermen be affected?

**Q: Has DEPP or the Bahamas Government checked with BREEF or the Bahamian agricultural and fisheries department to explore where the Nassau Grouper Spawning sites are located near to Lighthouse Point?**

4. **Q: What is the environmental impact of receiving 20,000 passengers per week? - Will that be 2,857 tourists per day – 7 days a week?**

**Q: What is the environmental management plan?**

The EIA was pre-COVID-19. Therefore what are the new protocols to adjust to COVID?

**Q: Shouldn't the current EIA be amended to address COVID-19 protocols and plans?**

5. **Q: Will “scrubbing” affect Lighthouse point and the surrounding areas? Do Disney Ships fall into this category?**

If Nassau and Freeport are top Scrubbers – Tribune article – May 3<sup>rd</sup> – Surely, nearby cays and islands are also affected? Sam Duncome from reEarth stated: “ All scrubbers (open-loop, closed-loop, and hybrid) discharge wash water that is more acidic than the surrounding seawater and which contains polycyclic aromatic hydrocarbons (PAHs), particulate matter, nitrates, nitrites, and heavy metals including nickel, lead, copper, and mercury (Comer, Georgeff, & Osipova, 2020).

“Nassau Cruise Port’s top executive yesterday said “more work is definitely needed” after the Bahamian capital and Freeport were ranked in the world’s top five ports for “wash water pollution” discharges.

#Michael Maura, speaking after the International Council on Clean Transportation (ICCT) ranked Nassau and its Grand Bahama counterpart fifth and third in the world for such contaminant releases, told Tribune Business this was an issue both The Bahamas and global maritime industry “need to be looking at”.

**6. How can development like a cruise port and the Disney project be allowed to go forth in a Bahamas Marine Protected Environment? Are laws being ignored or broken?**

7. **The EIA states that there are ZERO coral reefs in the footprint of the Disney Development.**

**Q: What will happen to the coral reefs when changes are made to the beach?** As soon as a major storm hits, the sands will shift and cover the coral reefs, killing some of the life form there. This according to one of the speakers in the Town Hall Meeting of April 15<sup>th</sup> (Tom Goreau). Does the EIA cover the safety of the beaches, erosion, etc...?

8. Disney stated that there was a stakeholder agreement having met with hundreds in The Bahamas.

**Q: Did Disney meet with the important stakeholders like BREEF, reEarth, Science and Perspective, The Island School/The Cape Eleuthera Institute, the One Eleuthera Foundation and other major Bahamian stakeholders?** BNT and the Perry Institute for Marine Science and Legacy are not enough.

**9. Q: Why hasn't the FULL Disney EIA economic impact study not been shared – just snippets – with the public?**

Therefore the public cannot make intelligent decisions and information on how the study has been done, can't be analyzed. For example, what are the cost benefit analysis and the impact on Bahamians and The Bahamas? The draft Disney EIA stated that there will be an \$800 million increase in Bahamas GDP in 25 years. That's 32 million/year. **Q: Where is the supporting information for these projections?**

*A local scientist stated: 20,000 guests per week for 52 weeks per year = 1,040,000 guests a year. \$800,000,000 dollars over 25 years = approximately \$32,000,000 yearly less than \$32 dollars per guest for a Disney lighthouse point guest.*

*If the employees get 600 per week and there are 150 of them in construction and operational phases, that comes to \$90,000 per week or \$4,680,000 per year - so in wages, Bahamians get \$4.50 per guest on their island.*

10. **Q: What is a crown land lease of the seabed?** Is this something that Disney was granted? Does that mean that Bahamians cannot enter the area for fishing or access the beach? Is that against the law?

The [Change.org](https://www.change.org/p/disney-stop-disney-last-chance-for-lighthouse-point) petition is one of the biggest we have ever seen in The Bahamas. We want better for our country. In the Sign the petition to call upon Disney to STOP DISNEY LAST CHANCE FOR LIGHTHOUSE POINT:

**May 6, 2021 – 6:50 pm - 445,963 have signed. Almost half a million signatures!!!**

**Azaleta Ishmael-Newry**

*A concerned Bahamian on the Disney's EIA for Lighthouse Point*

## **Morris, Meghann E.**

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**From:** DCL Bahamas  
**Sent:** Tuesday, July 6, 2021 12:43 PM  
**To:** bear6@verizon.net  
**Subject:** Comment on Lighthouse Point EIA

Thank you for your message. It will be shared with The Bahamas Department of Environmental Planning and Protection (DEPP).

We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and that there will be no loss of marine or terrestrial biodiversity at a species level – with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.

Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.

Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.

The report that proposed a new Marine Protected Area in South Eleuthera points out that the reef near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point, we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney has demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that will be generated by the project. This includes the creation of at least 150 well-

paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, as well as the establishment and growth of local businesses that will support the project, among other opportunities.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (please insert that range, which is in some of the other responses). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. This will be further discussed in the Environmental Management Plan.

Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.

To provide further clarity, The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line.

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.

We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:

- Solar panels (PV) and batteries sized to cover 90% of the estimated island electricity consumption
- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

On waste, the island will be zero waste to landfill. The goal is to minimize any waste that comes onto the island in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations. The primary waste generated will be organic waste, which will be treated with a biodigester. Project initiatives include:

- Reusable dishware with fully compostable accessories when single-use items are needed
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

For water, we are not withdrawing any water, and making water on the island using renewable electricity. We will have a water treatment system on site and will use reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. Project initiatives include:

- Development of a wastewater treatment system to serve irrigation, wash-down, and flushing systems with reclaimed water
- Low-flow water conserving fixtures in all restrooms

We will continue to refine the performance of the operation and will install meters throughout the island to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

Initial emissions estimates were completed before the design of the island was complete. These initial estimates include emissions associated with the direct combustion of fossil fuels for heating, cooking, electricity, waste incineration, and transportation, as well as those associated with the use of refrigerants. The initial estimates of 3,100 metric tons CO<sub>2</sub> per year were based on achieving the minimum requirements from the Heads of Agreement for 30% renewable energy as well as our past operational environmental data.

The project plans will be formulated to account for future impacts from climate change, including sea level rise (SLR). Using guidelines established by the U.S. Federal Emergency Management Agency's (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50, 100 and 500 year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.

All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite "Hurricane Shelter" is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III

buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.

Regarding biodiversity, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species List and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

A detailed analysis of benthic resources including corals within the footprint of the marine facilities has been completed in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRRA), coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted. Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline, which will be included in the Public Consultation Report. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.

The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
- Developing training and professional development programs to maximize opportunities for Bahamians.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products.

Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training. Additionally, a portion of the funding provided by Disney will be used for small business grants across a variety of businesses and industries.

The direct and indirect impacts to the dry broadleaf evergreen forest are available in the EIA Section 6.1.1. Dry broadleaf evergreen forest covers nearly 50 percent of the property, or more than 470 acres. Development is expected to directly impact 39.2 acres of dry broadleaf evergreen forest. This estimate is on the high side as impacts may be less as notable features will be preserved and other species may be relocated prior to land clearing and used for vegetation. These impacts are mostly associated with the Back of House facilities, guest recreation areas and related site infrastructure, including primary and secondary circulation corridors (i.e., roads), the adventure camp, and the access road that is proposed to be constructed to provide access to the Disney Donated Public Lands parcel. Once paved the road will have the capacity to service more than 15,000 vehicles per day but as noted in the EIA we would utilize just a small fraction of this total capacity. Additional information on this may be found in the EIA Section 4.3.4 PROPOSED TRAFFIC / TRANSPORTATION INFRASTRUCTURE and Section 6.3.6.3 TRAFFIC / TRANSPORTATION (VESSEL / VEHICLE). Development will result in shifts in terrestrial species abundance and distribution, however because more than 80 percent of the property will remain in its existing condition, these shifts in species usage are unlikely to result in significant changes in the populations of individual species of birds or other animals.

Section 7 of the EIA provides extensive information about proposed mitigation measures. These will also be further addressed in the Environmental Management Plan.

There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

**From:** [bear6@verizon.net](mailto:bear6@verizon.net) <[bear6@verizon.net](mailto:bear6@verizon.net)>

**Sent:** Thursday, 6 May 2021 6:06 pm

**To:** DEPP Inquiries <[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)>

**Subject:** Comment on Lighthouse Point EIA

Dear Sir or Madam: Please find comments on the Environmental Impact Assessment for Disney Cruise Line's project at Lighthouse Point, Eleuthera, The Bahamas, attached.

Thank you for your consideration. If there are any questions, I can be reached at [bear6@verizon.net](mailto:bear6@verizon.net)

Dinah Bear

Dear Sir or Madam:

I was asked to undertake an independent review of the Environmental Impact Assessment (EIA) for the proposed Disney Cruise Line's at Lighthouse Point on Eleuthera Island. I had heard nothing about this project until I received this request. My personal experience with the world of Disney was always quite positive, having associated Disney with, among other things, a strong identification with nature conservation. I was therefore surprised and dismayed at finding so many fundamental deficiencies in the EIA for this proposed project.

For context, I oversaw the implementation of environmental impact assessment procedures in 85 federal agencies in the United States for 25 years, as Deputy General Counsel for one year and General Counsel for the President's Council on Environmental Quality for twenty-four years. Additionally, I headed exchanges on environmental law and environmental impact assessment with Japan and the USSR and was involved in international negotiations regarding environmental impact assessment. A fuller biographical sketch is attached.

Below I identify major problems with the EIA as it currently stands.

1. *Purpose of EIA:* This document suggests a fundamental misunderstanding of the purpose of EIA. The purpose of EIA is not to document the impacts of a decision that has already been made and suggest a bit of mitigation. Rather, the highest purpose of EIA is to evaluate the environmental (and, in the U.S. and some other EIA systems related social and economic impacts) of a proposed action and alternatives to that action to inform decisionmaking. In the words of the United Nations Goals and Principles of Environmental Impact Assessment, the number one goal of EIA is, "To establish that before decision are taken by the competent authority or authorities to undertake or to authorize activities that are likely to significantly affect the environment, the environmental effects of those activities should be taken fully into account."<sup>[1]</sup>

Similar statements can be found in EIA procedures around the world. It is unfortunate that in this instance, Disney Cruise Line has already secured certain commitments from the Bahamian government through the 2019 Heads of

Agreement document. During the one public session held by the government for this project, it was revealing that a representative of Disney Cruise Line predicted that a contractor would be chosen in May, 2021, to begin construction of the project.

These predecisional assumptions and commitments are extremely unfortunate and undermine the purpose of EIA. Given these facts, it is more critical than ever that the EIA present the government and the company with the necessary facts and objective analyses so that the government can determine whether and how they want to proceed with this project. As it stands, the document does not conform to international and U.S. standards for EIA and should not, in my professional judgment, be used for decisionmaking.

2. *Alternatives:* The single most critical EIA element to inform decisionmaking is the requirement to analyze alternatives to a proposed action. A good EIA process can identify alternative ways of reaching a goal in a manner that is not only better for the environment, but often a better project in other ways also. This EIA needs to identify both site and project alternatives, including alternatives suggested by the public, and analyze their impacts for public review and comment. Further, it should analyze the impacts of alternatives in the same level of detail as the proposed project. However, the EIA document does not even mention – let alone analyze - any of the alternatives that have been identified by organizations and individuals, such as a Disney project that focused on nature and ecosystem education and research, and instead compares the proposed project to a strawman alternative that has already been rejected.

As I understand it, an analysis of alternatives is required by Bahamian law.<sup>[2]</sup> In Disney's home country, the requirement to analyze alternatives is the only requirement included not once, but twice, in the foundational EIA law, National Environmental Policy Act.<sup>[3]</sup> Additionally, alternatives are a required part of EIA in many other contexts, including implementation of two international agreements to which the Bahamas is a party: The Convention on Biological Diversity<sup>[4]</sup> and the Ramsar Convention on Wetlands.<sup>[5]</sup>

3. *Scope of Analysis:* The preponderance of effects analysis and mitigation measures in this document focus on construction of the project. However, even this analysis is woefully lacking and leads to conclusions that are not substantiated and appear to be contrary to available information. For example, Dr. Thomas Goreau, a very distinguished marine biologist, former Senior Scientific Affairs Officer at the United Nations Centre for Science and Technology for Development, and currently President of the Global Coral Reef Alliance and a man with much familiarity with the Bahamas, made a stunning presentation at a public meeting held on April 22<sup>nd</sup>. He explained how the sand that Disney Cruise Line plans to use to fill in beachfront property inevitably will be washed off during hurricane season and smother the spectacular reefs, habitat for live staghorn and elkhorn corals (as has occurred in south Florida). Dr. Goreau's analysis clearly suggests that the conclusion of the EIA that "construction and operation of the Project is not expected to result in any loss of terrestrial or marine biodiversity" is seriously mistaken and misleading. No amount of post-destruction restoration work can substitute for leaving this healthy reef ecosystem unharmed.

With minor exceptions, the EIA fails to analyze the impacts of up to 26,000 people a week (or approximately 1,352,000 people a year) recreating at at Lighthouse Point and other areas of the island that some tourists might explore. These impacts from the presence of thousands of people recreating in the area and the necessary support systems, such as transportation, to keep the resort operating, may be some of the most significant effects and yet analysis about them is woefully lacking. Rather, the EIA sometimes candidly admits that this analysis is lacking ("Secondary effects related to increase in visitors [affects on fish populations] is not known but adaptive conservation strategies to promote sustainable fisheries . . . will be addressed in the EMP."<sup>[6]</sup> Of course, no predictive analysis is perfect, but there is a substantial body of information about the effects of this type of development on fisheries that is being ignored in this EIA. Instead, after a brief reference to work on some possible mitigation options, the discussion devolves into what can only be described as a commercial for Disney, touting Disney's environmental activity books and support for summer camps.<sup>[7]</sup>

4. *Cumulative effects/climate:* Environmental impacts and related social or economic impacts must be evaluated in the context of past, present and reasonably foreseeable future developments that will effect the same resources that will be affected by the proposed action. To properly analyze such effects, the EIA should identify not only the environmental

baseline and the effects of construction and operations of the proposed resort, but also analyze those impacts along with the synergistic effects of past actions that are still impacting resources such as the reefs and dry forest habitats, other actions occurring now and in the foreseeable future that will affect this part of Eluthera.

An overwhelmingly significant aspect of such analysis must be related to climate change. There is a short, conclusionary discussion of the alleged non-impacts of the project on climate change. Much of that discussion simply relates in general terms Disney's environmental goals for 2030 and their particular targets, but fails to address the actual effects of this cruise line project. This discussion would simply not pass muster under U.S. jurisprudence<sup>[8]</sup> and the Bahamian government should not accept this inadequate work.

Given the location of this proposed project, it is nothing short of shocking that there is simply no discussion at all about the impacts of climate change, including sea level rise, on Lighthouse Point, its natural resources and the sustainability of the project itself. Again, Disney Cruise Lines knows, or should know, that in today's world, such analysis is an absolutely integral part of EIA. This is true worldwide, but it is especially true in island environments. For example, the State of Hawaii recently their EIA rules to require agencies to consider whether a project is likely to suffer damage by being sited in a sea level rise exposure area and require sea level rise maps to be included in EIA documents.<sup>[9]</sup>

5. *Missing baseline data*: The document reveals some very important gaps in baseline information – for example, do sea turtles nest on these beaches? What are the migration patterns of bonefish and how will they be affected? Are there coral reefs within the project footprint? The implicit suggestion that this information is unavailable seems, frankly, almost unbelievable.<sup>[10]</sup> The omission of this type of basic information certainly does not reflect Walt Disney Company Vice President Dr. Mark Penning's statement that the EIA "will be based on extensive field work, robust data collection and analysis, direct engagement with those who have studied the site and the species observed there, and an exhaustive review of available literature."<sup>[11]</sup> In fact, Dr. Penning's statement is an excellent statement regarding the type of information that should be obtained while preparing an EIS. Unfortunately, the EIA simply does not reflect that direction. Instead, we are to believe that the best the Disney Company can do is to publish an EIA that says, for example, "The extent to which beaches on the property are used for nesting by marine turtles is not known."<sup>[12]</sup> While the EIA then lays out a plan to conduct annual surveys (hopefully, this time, during sea turtle nesting season), this is the type of information that is essential for reasoned decisionmaking and should be obtained prior to final decisions about the project. Indeed, in Disney's home country, this "build the project and then get the information" approach has been held to be an invalid way of implementing the EIA process.<sup>[13]</sup>

Further, the EIA is devoid of meaningful analysis about the effects of the project on island communities. The document has exactly three paragraphs on surrounding communities; those paragraphs simply explain where the Bahamas and Eluthera are located and the size of the human population. This is totally unsatisfactory. The EIA should include analyses of the possible impacts of the project on the culture and social structure of the island, as well as the economic effects. Part of the social impact analysis should also be devoted to potential effects on the medical infrastructure on Eluthera, a subject of special relevance during this pandemic.

6. *Secret studies*: Then there is analysis that apparently has been done but that has not been shared with the public. For example, Appendix H presents summary tables and charts of the economic study but not the study itself. Why not? Does the study address only beneficial impacts of the project? Or does it, in fact, reveal negative effects, for example, possibly to fishing. Whatever its information and conclusions, there is no justification provided in the EIA for not including it in the document. Similarly, why isn't the "detailed analysis of benthic resources"<sup>[14]</sup> included in the EIA document?

7. *Superficial or no analysis*: The analysis of effects is quite superficial for a number of issues and focuses primarily on positive impacts. For example, for the proposed transformation of the road leading into the project area from a road that currently a road that will have the capacity to service more than 15,000 vehicles a day through dry, broadleaf evergreen forest, the analysis is "greater mobility"; not a word about the effects on the forest.<sup>[15]</sup> Tropical dry forests have long been considered highly endangered.<sup>[16]</sup> The dry forests of the Bahamas have been "heavily exploited" and "the development of a vast tourism infrastructure have taken a profound toll on the native biodiversity of this

ecoregion.”<sup>[17]</sup> Further, there is a large body of literature documenting the primarily adverse ecological effects of roads in virtually every natural setting in the world.<sup>[18]</sup>

As another example, one of the speakers at the first privately sponsored meeting pointed out, the analysis of waste disposal is significantly inadequate, both in terms of the impacts of on site incineration and the vague allusion to other “appropriate disposal”. The generation of energy and the provision of adequate water at Lighthouse Point for supporting millions of visitors are two absolutely essential support components of this proposed project, yet one searches in vain for factual details and effects analysis related to either issue.

8. *Mitigation* suggestions: The document promises much in the way of mitigation . . . much of it to be developed sometime in the future . . . and much of it presented as options, to be informed by an Environmental Management Plan (EMP) and adaptive management. Both of these mechanisms are important tools that used well, can be of great assistance in responsibly implementing a plan and carrying out operations. But the document fails to provide for an adequate foundation for adaptive management and the purpose of an EMP by failing to provide adequate analysis to set responsible benchmarks. Possible mitigation measures are tossed out as suggestions, not actual proposals. Core facts (are there sea turtles nesting on the beaches?) are unknown. Entire categories of analyses are missing (social effects on the island population; impacts on routes of bonefish). Without a decent fundamental EIA, these mechanisms are not likely to succeed.<sup>[19]</sup> The baseline information has too many gaps, essential portions of analysis are missing and it remains unclear what Disney is actually committing to in the way of mitigation and what benchmarks would be used in future evaluative activities.

**Conclusion:** This is a very disappointing show by such an iconic American company that has long been identified with spotlighting nature. The Walt Disney Company has said that it would approach this project with the same level of environmental stewardship and sensitivity that it brings to other Disney projects around the world.” I can say with confidence that this document would never be published in the shape that it’s in right now in California, the birthplace of Disneyland and the Disney company.

**RECOMMENDATION:** A revised or supplemental EIA document informed by public comments and expert analysis and preferably independent peer review should be circulated for public review and comment. To repeat, as it stands now, this EIA should not be utilized for decisionmaking.

Sincerely,

*Dinah Bear*

Dinah Bear

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<sup>[1]</sup> *United Nations Environmental Programme, Goals and Principles of Environmental Impact Assessment*, available here: <https://elaw.org/content/un-unep-goals-and-principles-environmental-impact-assessment>, Goals, 1.

<sup>[2]</sup> Official Gazette, The Bahamas, 16 September 2020, Reg. 5(2)), 2<sup>nd</sup> Schedule, 9/15/20, available here: <https://www.depp.gov.bs/wp-content/uploads/2020/11/Extension-of-Act-and-EIA-Regulations.pdf>

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<sup>[3]</sup> 42 U.S.C. §§ 4332(2)(C)(iii) (the EIS must include “alternatives to the proposed action”) and 4332(2)(E) (agencies must “study, develop, and describe appropriate alternatives to recommended courses of action which involves unresolved conflicts concerning alternative uses of available resources.”). National Environmental Policy Act, available here: <https://www.energy.gov/nepa/downloads/national-environmental-policy-act-1969#:~:text=The%20stated%20purposes%20of%20NEPA,enrich%20the%20understanding%20of%20the>

<sup>[4]</sup> Biodiversity-Inclusive Impact Assessment in the Context of the Convention on Biological Diversity and the 2030 Agenda: Ways Forward, Secretariat of the Convention of the Convention on Biological Diversity, available here: <https://www.cbd.int/impact/doc/IAIA17-Background-Paper.pdf>

<sup>[5]</sup> Environmental Impact Assessment and Strategic Environmental Assessment, Convention on Wetlands, available here: [https://www.ramsar.org/sites/default/files/documents/pdf/res/key\\_res\\_x\\_17\\_e.pdf](https://www.ramsar.org/sites/default/files/documents/pdf/res/key_res_x_17_e.pdf)

*See also, Principles of Environmental Impact Assessment Best Practice*, International Association for Impact Assessment, in cooperation with Institute of Environmental Assessment, UK, available here: [https://www.iaia.org/uploads/pdf/principlesEA\\_1.pdf](https://www.iaia.org/uploads/pdf/principlesEA_1.pdf); Directive 2011/92/EU of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU, available here: [https://ec.europa.eu/environment/eia/pdf/EIA\\_Directive\\_informal.pdf](https://ec.europa.eu/environment/eia/pdf/EIA_Directive_informal.pdf) and Environmental Impact Assessment of Nongovernmental Activities in Antarctica, available here: <https://www.govinfo.gov/content/pkg/FR-2001-12-06/pdf/01-30268.pdf>

<sup>[6]</sup> EIA, Lighthouse Point, Eluthera, The Bahamas (hereinafter “EIA”), p. 6-25.

<sup>[7]</sup> *Id.*

<sup>[8]</sup> As Disney Cruise Line lawyers must know, robust and specific analysis of effects of proposed actions on climate change have been required in the U.S. for many years. *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 508 F.3d 508 (9<sup>th</sup> Cir. 2007), amended at 538 F.3d 1172 (9<sup>th</sup> Cir. 2008). Agencies have the obligation to

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quantify greenhouse gas emissions, if feasible, from proposed actions and to compare them to local, regional and national emissions. *WildEarth Guardians v. Zinke*, 368 F. Supp. 3d 41 (D.D.C. 2019).

<sup>[9]</sup> State of Hawaii environmental impact statement rules, discussion re climate change in new rules here: <http://www.hilanduselaw.com/2019/06/hawaiis-new-eis-rules-become-effective.html> and full rules available here: [http://oeqc2.doh.hawaii.gov/Laws/v2.0-Proposed-HAR-11-200.1-Rules-Standard\\_Final.pdf](http://oeqc2.doh.hawaii.gov/Laws/v2.0-Proposed-HAR-11-200.1-Rules-Standard_Final.pdf) See also, “Climate change and disaster risk management mainstreaming in EIA”, *Strengthening Environmental Impact Assessment: Guidelines for Pacific Island Countries and Territories*, Secretariat of the Pacific Regional Environmental Programme, United Nations Environmental Programme, available here: <https://www.sprep.org/publications/strengthening-environmental-impact-assessment-guidelines-for-pacific-island-countries-and-territories> and *Aqualliance v. U.S. Bureau of Reclamation*, 287 F. Supp. 969 (E.D. Calif.) [https://www.gpo.gov/fdsys/pkg/USCOURTS-caed-1\\_15-cv-00754/pdf/USCOURTS-caed-1\\_15-cv-00754-7.pdf](https://www.gpo.gov/fdsys/pkg/USCOURTS-caed-1_15-cv-00754/pdf/USCOURTS-caed-1_15-cv-00754-7.pdf)

<sup>[10]</sup> During the one Bahamian government-sponsored public session about this project, I saw a comment in the chat box that appeared to be from someone associated with writing the EIA. That person indicated that people did not understand that they could only write about what they actually saw with their own eyes. In 40 years of working on EIA procedures both in the United States and globally, I have never heard of such a standard. Rather, the universal approach is to utilize all credible factual information and scientific analyses, including that gleaned from a search of relevant scientific literature as well as on-site observations.

<sup>[11]</sup> Letter to Ms. Shaw from Dr. Mark Penning, Vice President, Animals Science and Environment, the Walt Disney Company, November 11, 2019.

<sup>[12]</sup> EIA, p. 7-8.

<sup>[13]</sup> See, e.g., *The National Parks Conservation Association v. Babbitt*, 241 F.3d 722 (9<sup>th</sup> Cir. 2001); *Sierra Club and Friends of the Earth v. Norton*, 207 F. Supp. 2d 1310 (S.D. Ala. 2002).

<sup>[14]</sup> EIA, p. 6-16.

<sup>[15]</sup> EIA, p. 6-41.

[16] Janzen, Daniel H., “Tropical Dry Forests The Most Endangered Major Tropical Ecosystem”, Chapter 14, in *Biodiversity* (National Academy of Sciences, 1988).

<sup>[17]</sup> *Tropical and Subtropical Dry Broadleaf Forests: The Bahamas*, <https://www.worldwildlife.org/ecoregions/nt0203>

<sup>[18]</sup> [https://en.wikipedia.org/wiki/Road\\_ecology](https://en.wikipedia.org/wiki/Road_ecology)

Ancilleno Davis, PhD,

Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We have spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

**Question:** Restricted Access: Most of the debate surrounding Lighthouse point regards restricted access to the location for Bahamians, residents and non-Disney visitors. The EIA highlights positive benefits including job generation and pay scales for Bahamians.

**Response:** Disney's Heads of Agreement (HOA) with the Government of The Bahamas is clear on access for Bahamian residents and citizens for non-commercial purposes. The HOA in its entirety can be found in Appendix I of the EIA. Disney has committed to provide all citizens and residents of The Bahamas with full access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. In addition, approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands, which Disney will donate to the people and Government of The Bahamas. To help with accessibility, Disney has committed to construct a roadway through the Disney Donated Public Lands.

**Question:** Clarity is needed on what types of jobs will be available to Bahamians. Will there be positions at multiple levels of the organization for Bahamians or will Bahamians be restricted to lower levels of the organization/ menial labor positions such as cleaning, cooking, security or landscaping?

**Response:** Through its Heads of Agreement with the Government of The Bahamas Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards and more. These roles will include opportunities for advancement, as well as competitive pay and benefits. Also, with guests expected to be in port 3-5 days per week year-round and the need to complete a variety of projects on non-port days, these jobs will provide much-needed employment stability. Further, we anticipate jobs will be created by third parties who provide services to the operation and tours for guests, among other opportunities.

**Question:** The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment and represent income for immigration and potentially competition for local service providers, tour guides etc. Weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.

**Response:** Weekly passenger estimates refer to guests and are not inclusive of crew.

**Question:** How much time to conversion of all on island staff to Bahamians? Will all on island staff eventually be Bahamian? Will all on island supervisory staff be Bahamian? When in port how much of the on island work will be conducted by ship staff that come and work?

**Response:** Yes, it is anticipated that all jobs on the site will be Bahamian, including supervisory roles. Through its Heads of Agreement with the Government of The Bahamas Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards and more. These roles will include opportunities for advancement, as well as competitive pay and benefits. Also, with guests expected to be in port 3-5 days per week year-round and the need to complete a variety of projects on non-port days, these jobs will provide much-needed employment stability. Further, we anticipate jobs will be created by third parties who provide services to the operation and tours for guests, among other opportunities.

**Question:** When the cruise ship is not in, there are only 2 people at Princess Cay. Will this be the same at Disney? What about the other staff/employees?

**Response:** With guests expected to be in port 3-5 days per week year-round and the need to complete a variety of projects on non-port days, these jobs will provide much-needed employment stability.

**Question:** Will these jobs be salaried monthly pay positions that are climate proof in the event of storms, or are they hourly wage jobs which will leave the employees vulnerable when storms or other events stop ship sailings or if the ship is diverted to another Disney property?

**Response:** Through its Heads of Agreement with the Government of The Bahamas, Disney has committed to creating sustainable economic opportunities for Bahamians, particularly in Eleuthera, and to strengthening the local community. Disney's commitments include creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.

**Question:** Non-commercial access to the site means no Bahamian can engage in financial gain on the site unless employed by Disney. Does this include all the donated lands?

**Response:** Approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands. Disney will construct a roadway through the Disney Donated Public Lands, a parking lot, and beach amenities including restrooms, but the land will not be controlled by Disney. Further inquiries on permitted activities on the Donated Public Land should be directed to the Government of The Bahamas.

**Question:** Can crown land in the area be sold and or restricted as such to a non-Bahamian entity?

Is this constitutional?

**Response:** Inquiries on use of Crown Lands are best directed to the Government of The Bahamas.

**Question:** Does non-commercial access also mean that Disney will not have any forced costs for participation (security, parking, food vending, admission) for Bahamians and our guests?

**Response:** This is not within the scope of the EIA. However, there will not be charge for citizens and residents of The Bahamas to visit the site.

**Question:** At Princess Cay there is a notorious fence that locals are not allowed to cross when the cruise ships are not present and then, only those Bahamians with a special permit can cross into the property when the cruise ship is in. Will Disney institute similar infrastructure?

**Response:** The Developer will provide all citizens and residents of The Bahamas with access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. Additionally, approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands. Disney will construct a roadway through the Disney Donated Public Lands, a parking lot, and beach amenities including restrooms.

**Question:** When ships are out of port, how will staff be earning money?

**Response:** Through its Heads of Agreement with the Government of The Bahamas, Disney has committed to creating economic opportunities for Bahamians, particularly in Eleuthera, and to strengthening the local community. Disney's commitments include creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.

**Question:** How do the weekly wages relate to guests per employee ratios?

**Response:** This is not within the scope of the EIA.

**Question:** How does this compare to local restaurants, hotels or other cruise ships?  
20,000 guests per week for 52 weeks per year = 1,040,000 guests a year. 800,000,000 dollars over 25 years = approximately 32,000,000 yearly less than 32 dollars per guest for Disney lighthouse point guest.

**Response:** This is not within the scope of the EIA and we cannot validate these assumptions.

**Question:** if the employees get 600 per week and there are 150 of them in construction and operational phases, that comes to 90,000 per week or 4,680,000 per year. In wages, Bahamians get \$4.50 per guest on their island. What is the balance of the money that Disney estimates to enter the Bahamas?

**Response:** This is not within the scope of the EIA and we cannot validate these assumptions.

**Question:** The EIA disregards the cumulative impacts of adding the Disney cruise ships to the

Carnival and Princess Cruise lines visitors that already use the area. These cumulative impacts will be much more severe than Disney describes and there is no carrying capacity of the environment discussed. Combined with the lack of waste management and waste export protocols, burning on the island and deep injection disposal of waste will affect the environment.

**Answer:** This is not within the scope of the EIA. Disney can only speak to its proposed plan for development which strives to develop the site in an environmentally responsible way, create sustainable economic opportunities for Bahamians, celebrate Bahamian culture and further strengthen the community.

Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.

**Question:** No Brazilian Pepper was mentioned in the area.

**Response:** Field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology can be found in the EIA Section 4.2.1. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species. Brazilian Pepper was not observed in these surveys. If observed in future surveys, the EIA will be supplemented to reflect the updated species. That being said, there will be a conscientious effort to remove and/or control invasive non-native species that are listed in The Bahamas National Invasive Species Strategy.

**Question:** The Protected trees order is much larger now and the botanical survey should be updated to reflect that and the species there.

**Response:** Disney is aware that since the EIA was submitted to Government, Forestry (Declaration of Protected Trees) Order legislation has passed that expanded the list of protected tree species in The Bahamas. Disney has reviewed site transects and box plots to determine the species found in each habitat. The new list was added to the EIA as an addendum prior to final submission to the Department of Environmental Planning and Protection, and any necessary management and mitigation will be outlined in the Environmental Management Plan.

**Question:** The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment. They also represent income for immigration and potentially competition for local service providers, tour guides etc. weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.

**Response:** Weekly passenger estimates refer to guests and are not inclusive of crew.

**Questions:**

Disney has indicated that the development may improve habitat for Kirtland's warblers. You need diverse species that are appropriate for the use of the birds. What plant species are on their landscaping and do not remove lists? What patterns of canopy structure will they work to achieve?

It is unlikely that the development can improve habitat for kirtland's warblers. The Disney planting and landscape plan should not include any nonnative trees if possible. I have worked with the Kirtland's warbler directly including finding the first major group of them on the island of Eleuthera back in the early 2000's. This does not seem appropriate at all.

**Response:** Currently we are only developing 16% of the property with a maximum of 20% through the life of the operations. We agree that the type of vegetation in modified habitats is of critical importance to determining what wildlife those habitats will support. At LHP, areas impacted by site development will be revegetated using a landscaping palette of native plants, with an emphasis on those plant species that provide food resources for birdlife. Consequently, while it will take time for this vegetation to fully mature, revegetated habitats will provide the resources needed to support the birdlife referenced in the EIA as preferring less dense areas. Through our terrestrial monitoring program, we have established a baseline of the avian community diversity in areas to be developed, and we will be able to assess how that birdlife responds to revegetated areas following construction. Based on our findings, we will adaptively manage revegetated habitats to maximize their conservation value to LHP wildlife.

Kirtland's warblers are addressed in the EIA Section 7.3.1.3 – Kirtland's Warblers. It is stated that disturbance to the vegetation that will result from the Project could possibly eventually create new areas of the early successional vegetative cover that is used by that species. Like all of the environmental monitoring Disney already has in place, avian surveys continue today and a section of the Environmental Management Plan will be based on the results of continued investigations with the goal of maintaining or enhancing the population of Kirtland's warblers on the property and/or South Eleuthera.

**Question:** The Piping Plover is also at risk and protected and have been detected on that beach. How can the impact to this species be quantified or mitigated with so little research and follow up?

**Response:** As shared at the April 8, 2021 Department of Environmental Planning and Protection public meeting for Lighthouse Point at minute 27:30, avian surveys conducted helped inform the decision to conserve and protect a portion of the site at Bottle Bay Beach where piping plovers have been observed to ensure we can maintain a wintering population of this species on the site. Additional information on this can be found in EIA Section 7.3.1.1 – PIPING PLOVERS. Additional information will also be included in the Environmental Management Plan. Like all of the environmental monitoring Disney already has in place, avian surveys continue today and a section of the Environmental Management Plan will be based on the results of continued investigations with the goal of maintaining or enhancing the population of Piping Plovers on the property and/or South Eleuthera.

**Question:**

A Key element of the EIA is the characterization/classification of the habitat. In particular, Marine habitat includes areas characterized as "barren sands" in the Disney EIA. I have never seen barren sands in the Bahamas and open sandy areas include species such as flounder, bonefish, sharks, skates, rays. Sandy areas also serve as foraging sites for species such as dolphins who capture fish like rosy razorfish and eels. The sporadic nature and short duration of the surveys combined with the survey bias misrepresent the value and sensitivity of marine habitats. Biases are introduced when sandy areas are disregarded as barren or when surveys focus on coral based methodologies such as AGRRA. Discussions of Marine environment issues (4-89) included The Cape Eleuthera Institute, the Perry Institute for Marine Sciences and the Bahamas National Trust. These organizations all have considerable experience and investment in our marine resources. Additional consultations with the Bahamas Reef Environment Educational Foundation and the Bahamas Fisheries Association may have generated different results or improved the understanding of the resource.

**Response:** Within this EIA, over 400 hours involved in underwater surveys including AGRRA and other survey techniques were performed inclusive of the sand environments. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species List and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.

**Question:** The EIA states that bonefish do not use the area based on personal Communication with one fisherman, and reference research that describes nurse shark mating areas and grouper spawning aggregations as being outside of the area of impact. Research bias limits the research of other groups to the area within their reach. Has any significant research been completed in this area that can definitively state that the area is not used or has the research not been conducted there? Those are two different judgements.

**Response:** The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a

permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

Regarding fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

SEEing Sustainability at Lighthouse Point  
Disney Cruise Lines Lighthouse Point EIA review  
created by  
Ancilleno Davis, PhD  
Disney Cruise Lines Lighthouse Point EIA – Review

### Background

Disney Cruise Lines have proposed a development at lighthouse Point in Eleuthera, The Bahamas. The proposed development has evolved significantly over the past few years and seen a major reduction in the acreage to be developed and the amount of natural habitat to be impacted. This development is expected to bring many more guests to the island of Eleuthera than ever before, however, those guests will be prevented from interacting with the people and economies of Eleuthera by significant social, physical, technological and economic boundaries. Each of these barriers will be discussed in this review.

The Lighthouse Point development will impact the environment in and near the development during the construction and set up phases through immediate catastrophic effects such as habitat removal, dredging and species introduction. Long term and cumulative effects on the site will also result from repeated and persistent introductions to the site such as human waste and food waste, insecticides and insect repellents and sunblock.

There are gaps in the methodology used in the implementation of the Disney EIA and several of these gaps should be resolved before implementation of the project.

The site has been purchased by Disney already. The Project site includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas (2.1). The project site is 919 acres and includes 758 acres purchased by Disney

Area Sub set  
Crown Lands Big Pond

White Pond

Other Land Parcels

Subtotal 161

Disney Purchased

property

Donated Public

Lands

193

Undisturbed 413

Development 152

subtotal 758

Total Project 919?

The site is intended to serve Disney Cruise Lines Company which operates four ships registered in the Bahamas. Those ships are Disney Dream (4,000 pax), Disney Fantasy (4,000

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pax), Disney Magic (2,700 pax), Disney Wonder (2,700 pax). The passengers include 1458 crew for Disney Dream and Fantasy and 945 crew for Disney Magic and Wonder.

Social

The Cultural landscape of the Bahamas and Eleuthera is vulnerable to disturbance and the people are subject to victimization as are people throughout the Caribbean.

Specific attention must be paid to the effect on local communities and economies, and the representation of local people.

Restricted Access: Most of the debate surrounding Lighthouse point regards restricted access to the location for Bahamians, residents and non-Disney visitors. The EIA highlights positive benefits including job generation and pay scales for Bahamians.

1. Clarity is needed on what types of jobs will be available to Bahamians. Will there be positions at multiple levels of the organization for Bahamians or will Bahamians be restricted to lower levels of the organization/ menial labor positions such as cleaning, cooking, security or landscaping?
2. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment and represent income for immigration and potentially competition for local service providers, tour guides etc. Weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.
3. How much time to conversion of all on island staff to Bahamians? Will all on island staff eventually be Bahamian? Will all on island supervisory staff be Bahamian? When in port how much of the on island work will be conducted by ship staff that come and work?
4. When the cruise ship is not in, there are only 2 people at Princess Cay. Will this be the same at Disney? What about the other staff/employees?

#### Economic

The Economic history and current climate of the Bahamas make the island of Eleuthera and the Bahamas on the whole vulnerable to exploitation from developers who have the money to encourage the country to accept unsustainable or unbalanced business offerings.

1. Will these jobs be salaried monthly pay positions that are climate proof in the event of storms, or are they hourly wage jobs which will leave the employees vulnerable when storms or other events stop ship sailings or if the ship is diverted to another disney property?
2. Non-commercial access to the site means no Bahamian can engage in financial gain on the site unless employed by Disney. Does this include all the donated lands?
3. Can crown land in the area be sold and or restricted as such to a non bahamian entity? Is this constitutional?
4. Does non-commercial access also mean that Disney will not have any forced costs for participation (security, parking, food vending, admission) for Bahamians and our guests?

#### Ancilleno O. Davis, PhD

5. At Princess Cay there is a notorious fence that locals are not allowed to cross when the cruise ships are not present and then, only those Bahamians with a special permit can cross into the property when the cruise ship is in. Will Disney institute similar infrastructure?
6. When ships are out of port, how will staff be earning money?
7. How do the weekly wages relate to guests per employee ratios?
8. How does this compare to local restaurants, hotels or other cruise ships?  
20,000 guests per week for 52 weeks per year = 1,040,000 guests a year.  
800,000,000 dollars over 25 years = approximately 32,000,000 yearly  
less than 32 dollars per guest for Disney lighthouse point guest.
9. if the employees get 600 per week and there are 150 of them in construction and operational phases, that comes to 90,000 per week or 4,680,000 per year. In wages, Bahamians get \$4.50 per guest on their island.

What is the balance of the money that disney estimates to enter the Bahamas?

#### Environmental

The natural environment of the area is sensitive to disturbance and has a history of exploitation

for economic gain. Resident and migrant bird species, fish, coral and other marine species use the area and are documented in various scientific and anecdotal reports.

The site has been purchased by Disney already. It includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas.

1. The EIA disregards the cumulative impacts of adding the Disney cruise ships to the Carnival and Princess Cruise lines visitors that already use the area. These cumulative impacts will be much more severe than Disney describes and there is no carrying capacity of the environment discussed. Combined with the lack of waste management and waste export protocols, burning on the island and deep injection disposal of waste will affect the environment.

2. No Brazilian Pepper was mentioned in the area.

3. The Protected trees order is much larger now and the botanical survey should be updated to reflect that and the species there.

4. Though not specifically protected, endemic species have restricted distribution in the Bahamas and the region. There are other species as well that are of local and regional importance but are not necessarily listed in international treaties or local law. Our native and endemic species are more locally important for sustainable place based tourism. The surveys took place outside of their breeding season and were therefore biased toward winter migrant species. We need more study to account for those species.

Ancilleno O. Davis, PhD

5. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment. They also represent income for immigration and potentially competition for local service providers, tour guides etc. weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.

6. IT is unlikely that the development can improve habitat for kirtland's warblers. The Disney planting and landscape plan should not include any nonnative trees if possible. I have worked with the Kirtland's warbler directly including finding the first major group of them on the island of Eleuthera back in the early 2000's. This does not seem appropriate at all.

7. THE Piping Plover is also at risk and protected and have been detected on that beach. How can the impact to this species be quantified or mitigated with so little research and follow up?

8.

Mischaracterization of Habitat

A Key element of the EIA is the characterization/classification of the habitat. In particular, Marine habitat includes areas characterized as "barren sands" in the Disney EIA. I have never seen barren sands in the Bahamas and open sandy areas include species such as flounder, bonefish, sharks, skates, rays. Sandy areas also serve as foraging sites for species such as dolphins who capture fish like rosy razorfish and eels. The sporadic nature and short duration of the surveys combined with the survey bias misrepresent the value and sensitivity of marine habitats. Biases are introduced when sandy areas are disregarded as barren or when surveys focus on coral based methodologies such as AGRRA.

Discussions of Marine environment issues (4-89) included The Cape Eleuthera Institute, the Perry Institute for Marine Sciences and the Bahamas National Trust. These organizations all have considerable experience and investment in our marine resources. Additional consultations with the Bahamas Reef Environment Educational Foundation and the Bahamas Fisheries Association may have generated different results or improved the understanding of the

resource.

1. The EIA states that bonefish do not use the area based on personal Communication with one fisherman, and reference research that describes nurse shark mating areas and grouper spawning aggregations as being outside of the area of impact. Research bias limits the research of other groups to the area within their reach. Has any significant research been completed in this area that can definitively state that the area is not used or has the research not been conducted there? Those are two different judgements.
2. Disney has indicated that the development may improve habitat for Kirtland's warblers. You need diverse species that are appropriate for the use of the birds. WHAT plant species are on their landscaping and do not remove lists? What patterns of canopy structure will they work to achieve?

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Thank you for your message. It will be shared with the Bahamas Department of Environmental Planning and Protection.

We understand your concerns about biodiversity and fisheries impacts and completely agree that decisions must be made using high-quality data, taking into consideration the entire ecosystem. Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level. We also feel the need to clarify that many of the concerns raised appear to be directed more toward the Environmental Impact Assessment (EIA) process in The Bahamas, and not the degree to which our EIA fulfills the intended outcomes of the document. We are confident, however, that many of the points you raise will be addressed in the Environmental Management Plan, which will also go through public review and will have more details about the specific construction practices.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

Regarding biodiversity, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for marine resources can be found in the EIA Section 4.2.2 – MARINE RESOURCES.

The marine resources investigation included a focus on fish and coral and consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting this fall.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In

addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past LHP and pre-spawning activity does not occur at Lighthouse Point, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Educational programs to reduce overfishing and improve overall management practices are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as "the Bridge," which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the

area. That being said, we will be monitoring 36 index sites for coral and fish community impacts in the region to account for any changes that may be the result of the project.

Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to respond to changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

Facts about the project, as well as a downloadable version of the Environmental Impact Assessment and a related fact sheet, are available at [www.lighthousepointbahamas.com](http://www.lighthousepointbahamas.com).

Thank you.

#### Literature Cited

Burruss, G.M. 2018. Movements of Bonefish (*Albula* spp.) in The Bahamas: multiple migration routes and associated environmental cues. Master's Thesis. Michigan State University. ProQuest Number: 10932030

Danylchuk AJ, Cooke SJ, Goldberg TL, Suski CD, Murchie KJ, Danylchuk SE, Shultz AD, Haak CR, Brooks EJ, Oronti A, Koppelman JB (2011) Aggregations and offshore movements as indicators of spawning activity of bonefish (*Albula vulpes*) in the Bahamas. *Mar Biol* 158(9):1981–1999

Haak CR, GW Cowles, AJ Danylchuk. 2018. Wave and tide-driven flow act on multiple scales to shape the distribution of a juvenile fish (*Albula vulpes*) in shallow nearshore habitats. *Limnology and Oceanography* doi: 10.1002/lno.11063

Haak CR, M Power, GW Cowles, AJ Danylchuk. 2019. Hydrodynamic and isotopic niche differentiation between juveniles of two sympatric cryptic bonefishes, *Albula vulpes* and *Albula goreensis*. *Environ Biol Fish* 102:129-145.

Murchie, KJ, CR Haak, M Power, ON Shipley, AJ Danylchuk, SJ Cooke (2019). Ontogenetic patterns in resource use dynamics of bonefish (*Albula vulpes*) in the Bahamas. *Env Biol Fish* 102:117-127.

Wallace EM, Tringali MD (2016) Fishery composition and evidence of population structure and hybridization in the Atlantic bonefish species complex (*Albula* spp.). *Mar Biol* 163(6):1–15.

# Review of the Fish/Fisheries/Marine Resources portion of the EIA for DCL's proposed Lighthouse Point Cruise Ship Port Project

Submitted To DEPP by the Fisheries Conservation Foundation  
May 5, 2021

**SUMMARY:** The Fisheries Conservation Foundation (FCF) concludes that the Environmental Impact Assessment submitted in support of the proposal by Disney Cruise Lines (DCL) to build a cruise ship port at Lighthouse Point in southern Eleuthera falls far short of being legitimate. The submitted EIA document is filled with unsubstantiated and illogical claims that no harm will come to the surrounding environment, when in fact just the opposite is true. Disney's tactic of producing multitudes of pages full of meaningless lists of observed organisms instead of actually considering in a biologically meaningful context the potential impacts of the proposed project on the affected marine resources. That omission alone should be enough to dismiss the submitted EIA as wholly inadequate. It is clear that nobody associated with the production of this document had adequate training or experience in marine biology, fisheries ecology, or ecosystem level management of marine resources.

To be clear, as marine resource/fisheries conservationists, FCF will only be commenting specifically on those portions of the submitted EIA that deal with topics/issues related to our areas of expertise. Our extended research group has been conducting research on marine ecology and fish reproductive behavior in the Bahamas for over 20 years (see the publication list presented below the compendium of signatures). Regrettably, the preparers of the EIA chose not to contact us for input, even after we offered repeatedly to sit down and discuss our concerns. Instead, those authors chose to misrepresent who we are and what we found in our research (see section 4.2.2.3 on p 4-130). In reality, our group, the group that actually conducted the research on bonefish (see publication list) in the Bahamas, was a partnership only between the Fisheries Conservation Foundation (FCF) and the Cape Eleuthera Institute (CEI). Participating researchers were from a number of different institutions associated with FCF, staff from CEI, and students from the Island School as part of their research class activities. In addition, it is important to note that those research activities were supported via private donations to FCF and institutional resources from CEI. We also want to emphasize that no remuneration was received by participating researchers; research personnel volunteered their time and financial support. The scientists did not receive any compensation or royalties for publishing their research. Instead, our published research is freely available to the public, and we hope it is used to make wise resource management decisions that result in sustainable fisheries (see the publication list below).

Before getting into specifics of the EIA's treatment of specific marine/fisheries issues, we wish to dispute Disney's general claims of "no environmental harm" in the EIA.

1. In a quote taken directly from the Disney EIA factsheet, Dr. Mark Penning, Disney Vice President, Animals, Science, and the Environment, states "As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible with the appropriate environmental management in place." There are two major problems with Dr. Penning's blatant dismissal of the issue as to whether the project will or will not have negative impacts. First, the EIA

document in no way confirms that the proposed project might be implemented in any possible way that would indeed protect the fragile environment at Lighthouse Point, because the EIA does not actually assess the project's potential impacts. Second, that failure of the EIA is dismissed by intimating that there will be an "appropriate environmental management plan in place", whereas in reality Disney has not ever provided such a plan. In essence, Dr. Penning is asking The Bahamas to accept the idea that any problems that might arise would be overcome by some as yet to be articulated management plan. We believe that not only is there no such plan in existence, but also that no plan capable of mitigating for all of the impending destructive impacts of DCL's proposed project could even be developed. As a result, without a comprehensive EMP, the EIA simply fails to meet international standards.

2. Repeatedly in their EIA and communications associated with its promotion, Disney makes the following claim: "The development and operation of a proposed Disney Cruise Line (DCL) destination at Lighthouse Point isn't expected to result in a loss of terrestrial or marine biodiversity." That statement is problematic from a number of standpoints. First, based on the scope of opposition to the project from actual biologists, even with the minute available data provided by the EIA document, most individuals qualified to offer an informed "expectation" would say just the opposite...that a loss of terrestrial and marine biodiversity WOULD be expected. Second, their definition of "biodiversity" and hence of its loss is antiquated. They use a simple LIST of species observed as the single biodiversity metric to be measured, even though it has been universally accepted that components of biodiversity exist at the level of the gene up to that of the ecosystem. In addition, it is well accepted that biodiversity can be negatively impacted without the actual loss of any single species. As a result, their definition of loss as the local extirpation of a species from the area is inappropriate and dismisses all but the most severe outcomes. Third, there are many other destructive outcomes other than loss of biodiversity such as loss of critical habitat, decreased reproduction/annual recruitment of organisms, and altered behaviors that would have serious consequences at a population, community, and ecosystem level. Not only does the EIA document fail to address these areas of potential concern, it fails to even acknowledge the concepts. The EIA throws out pages and pages of lists and photos of organisms, apparently in a strategy to impress with volume rather than substance. As professional biologists, we see beyond that strategy and find that the document has no actual ASSESSMENT of the proposed actions, i.e., no consideration of potential impact on biological processes that would provide an indication on the long-term trajectory of the health of the affected populations and communities of organism that make up the various ecosystems that would be impacted by such a project.

3. The systemic lack of specifics and expertise exhibited throughout the EIA document is exemplified by the Executive Summary. For an EIA for a project that proposes massive use of and dependence upon the marine and coastal environment, it is quite telling that within the 18-page Executive Summary the word "fish" is used three times (twice in one sentence) and the word "fisheries" not at all.

We now wish to address specific comments re marine resources and fish/fisheries issues:

1. The EIA substantially underestimates the spatial area that may be impacted by the proposed cruise ship port project. Throughout the document there is the intimation that the extent of marine environment impacted by the development should be restricted to basically the shadow of the pier with perhaps a small added area down each side. There are two serious flaws with that approach. First, the impact of having upwards of 28,000 visitors to the beach every week will undoubtedly have long-term negative effects across the several miles of coastline that comprise the project's scope. The beaches, the reefs, and the substrates there will be altered substantially with the number of organisms inhabiting those areas decreasing by some

combination of avoidance through emigration or simple mortality. Similar widespread negative impacts will also be caused by routine boat operations (prop wash, pumping, waste production, and more)...it is unavoidable if large ships are allowed close and repeated access.

2. There is also the mistake of underestimating the importance of the location of Lighthouse Point as one of the two gateway entrances to the Exuma Sound, i.e., Lighthouse Point, Eleuthera on the north and Columbus Point, Long Island on the south. Exuma Sound is critical to the life history of many species of aquatic organisms because of the "box canyon" nature of its shape. Exuma Sound consists of a deep basin with deep water ocean gyre currents that entrain larvae of many species within the Sound (including bonefish, groupers, snappers, and even conch), protecting them from predation, allowing them to develop and recruit back into the local populations. Fish species migrate long distances to spawning aggregation sites located along deep-water drop-off locations of the Exuma Sound (including the Eleuthera and Exuma coasts). Many, most, or maybe all of those fish entering the Sound from the north will swim south along the Eleuthera coast and around Lighthouse Point extremely close to the shoreline for the entirety of their migration. Disturbance of the coastline will alter their behavior, likely preventing many or most from completing their spawning migration. In this way, a large pier such as proposed by Disney to service/dock a cruise ship will serve as a barrier to that migration, a barrier analogous to how a hydroelectric dam blocks salmon spawning in rivers around the globe.

As an illustrative example of the potential level of impact, our research team has used acoustic telemetry to map the bonefish spawning sites on Eleuthera and across the Little Bahama Bank. An important Eleuthera site (one of only five on the entire island of Eleuthera) is located approximately five miles from the proposed Disney development site at Lighthouse Point. Adult bonefish travel great distances along the Eleuthera coastline to spawn at these sites, which entrain the developing larval bonefish for approximately two months prior to their metamorphosis, eventually distributing them across Eleuthera and even throughout other areas of the Bahamas. This spawning site, which is only one of two in all of south Eleuthera, is undoubtedly not only an important source of juvenile bonefish for the Eleuthera fishery, but it provides substantial inputs into the bonefish populations on many other islands as well. Loss of its productivity would damage the Bonefishing industry on Eleuthera specifically, but more generally, also negatively affect the broader Bahamian fishery and the economy of the Family Islands.

Bonefish are not unique in their migration to specific spawning sites; there are many other species of fish that move into Exuma Sound at Lighthouse Point for spawning as well, some of which (e.g., snappers and groupers) have huge economic importance to the Bahamian fishing and tourism industries. Bonefish and these other species of fish migrate to spawning sites (often up to 100 miles in a day or two) by swimming along the coastline, in very shallow water very close to shore, in and among the reef heads, never venturing out into deep water where large predators lurk. In fact, our telemetry research has shown that while migrating, bonefish rarely enter depths over 1-2 meters, even if that would mean cutting miles off of their journey. As a result, nearshore waters within and adjacent to the proposed development site represent critical migration corridors.

Shoreline disturbance at any location within the migration corridor will have negative effects on fish, potentially causing some or all of those fish to abort the journey. Construction of a pier and marina, as well as the eventual ship traffic and high concentration of human activity, proposed at Lighthouse Point certainly constitute profound shoreline disturbance. It is likely that during construction and later during actual operation, disturbance levels would seriously diminish bonefish reproductive success, possibly eliminating it all together at this site, simply by deterring the fish from using this historical migration corridor to reach nearby spawning sites. Unfortunately, our research has been misrepresented

profoundly in the EIA, being used to support the false assertions of the EIA that no impacts to fish migrations will occur. In reality, our work has determined just the opposite, that noise and disturbance associated with human disturbance results in bonefish no longer migrating through an area to form spawning aggregations.

Given these points, we urge that a REAL **pre-construction assessment** on impacts of economically and culturally important marine species in the area be conducted, and that a plan for long-term **post-construction monitoring** of impacts be instituted if the proposed project is somehow accepted. Right now, as the document stands, those two critical elements are absent from the EIA; monitoring activities mentioned in the EIA focus only on corals and are restricted to bottom habitat immediately below the pier and marina structures. Unfortunately, substantial turbidity, traffic, pollution, light, and noise impacts will extend well beyond the immediate structures of the proposed development, an outcome supported by the fact that the 2020 closure of the Key West cruise port has resulted in substantially improved water quality and increased abundance of marine life. As it stands, the EIA fails to address any of these impacts.

In conclusion, we strongly urge the Bahamian government to reject the DCL EIA and deny further progress on the Lighthouse Point project until a legitimate EMP, mitigation plan, and EIA are all prepared and are based on real data and that address all of the concerns that are so blatantly absent from the current version.

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STOPDISNEY.COM



## **Comments: Disney Cruise Line’s Lighthouse Point Port Environmental Impact Assessment**

**Submitted by: The Stop Disney - Last Chance for Lighthouse Point Campaign**

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The Stop Disney - Last Chance for Lighthouse Point Campaign — which consists of reEarth, BREEF, Save the Bays, Waterkeepers Bahamas, Waterkeeper Alliance, and Friends of the Earth U.S., and has attracted more than 445,000 supporters — is pleased to submit this review of Disney’s Environmental Impact Assessment (EIA) for its proposed cruise ship port at Lighthouse Point on Eleuthera in The Bahamas.

As soon as the EIA was released to the public in March, we reached out to Bahamian and international experts to conduct independent analyses of Disney’s EIA. Many of their analyses can be found in the Appendix as part of these comments. We are also submitting the recordings of the two “extended public consultations” hosted by the Campaign as a follow up to the Department of Environmental Protection and Planning’s (DEPP) only public consultation on April 8th. In total, more than 160 concerned residents, experts, and stakeholders from Eleuthera, The Bahamas, and across the world attended the meetings. Links to the recordings can be found in the Appendix. In addition, more than 30,000 people have joined Friends of the Earth U.S. in submitting their comments on the EIA.

Disney says their team spent three years compiling the “most comprehensive Environmental Impact Assessments ever for a project in The Bahamas”. DEPP had it under **review for one year**. In contrast, the public was given just **two months** to review a 551-page document on a \$400 million project at a unique natural site surrounded by a proposed Marine Protected Area. Due to the truncated public review period, we did not have the time necessary to compile a complete list of necessary revisions to the EIA. The issues that we have identified and require supplemental studies are highlighted in yellow in the comments below. Please note that the materials in the Appendix should be considered part of our official comment, and require a response.

Disney is an iconic American company and one of the world’s most important storytellers about nature and the environment. They have stated repeatedly that they will not proceed with the current plans at Lighthouse Point unless it is “environmentally responsible”.

**[Dr. Mark Penning, Vice President of Animals, Science and Environment at the Walt Disney Company, further stated that “\[they\] have held \[them\]selves to the same standards of science and environmental review for this project that \[they\] would for any project anywhere in the world.”](#)** Yet our Campaign and numerous independent experts were disappointed to find that **the EIA is fundamentally flawed, filled with gaps, and falls far short of best practices in the industry.**

**Dinah Bear**, former General Counsel at the U.S. President’s Council on Environmental Quality (CEQ), stated in regard to Disney’s EIA, “This document suggests a fundamental misunderstanding of the purpose of EIA. The purpose is not to document the impacts of a

decision that has already been made and suggest a bit of mitigation. Rather, the highest purpose of EIA is to evaluate the environmental and related social and economic impacts of a proposed action and alternatives to inform decision making. As it stands, the document does not conform to international and U.S. standards for EIA.” The Campaign believes that it would be “environmentally irresponsible” to move forward on the basis of this review as it now stands.

Sadly many of the deficiencies in the EIA were avoidable. Our May 2, 2019 [EIA Scoping Outline Letter](#) and our July 23, 2020 [EIA Supplement Scoping Letter](#) to top Disney officials outlined key studies and analyses that needed to be included in a meaningful world-class EIA. Dr. Mark Penning, Vice President of Animals, Science, and Environment at the Walt Disney Company [replied to our 2019](#) letter and stated that the issues we outlined were already within the scope of their EIA. However, the majority are not included in the current draft of the document. We have reiterated these concerns below. Disney never responded to our 2020 letter and, despite multiple offers, did not meet with our experts about the scope of the EIA.

As a nation facing some of the most severe consequences from both climate change and the collapse of tourism due to Covid-19, The Bahamas deserves a full assessment of whether or not this project is a good deal for its people.

As we have stated repeatedly, **we stand ready to cooperate with Disney in preparing a comprehensive EIA that includes the necessary supplements listed below. These additions must be included to provide a sound basis for this important decision about the future of Lighthouse Point.**

### **Summary of Comments**

The major deficiencies in Disney’s EIA are as follows:

- The EIA relies on a still undisclosed economic study completed before COVID to make unsubstantiated claims about the economic benefits of the project for the people of Eleuthera and The Bahamas. There EIA needs to include data and analyses to show that this is a really “good deal” for all the stakeholders.
- The EIA does not address the social, economic, and environmental justice impacts of the proposed project.
- The EIA ignores climate change impacts and climate risk. It does not contain the necessary studies to outline the project’s contributions to climate change. It also does not contain the necessary studies to address risks to the project from sea level rise, storm surges, and increased coastal flooding associated with climate change.

- The EIA does not address the threat of Covid-19 or future pandemics. This is essential, especially considering the limited infrastructure and lack of a hospital on Eleuthera.
- The EIA does not mention that the waters surrounding Lighthouse Point have been officially proposed as a Marine Protected Area (MPA) as part of the Caribbean Challenge Initiative efforts to protect 20% of Bahamian marine resources by 2020.
- The EIA does not meaningfully consider alternatives, which is an explicit requirement in the Bahamian 2020 EIA Regulations. Disney continues to suggest that the only alternative was a much denser condo-marina project that was proposed for Lighthouse Point more than a decade ago. Disney does not mention that the project was opposed and failed. It does not consider the land-based sustainable alternative proposed by local groups.
- The EIA addresses the environmental impacts of the construction phase of the project, but provides little to no analysis of the long-term impacts of operation and up to 1 million visitors a year.
- The EIA focuses primarily on terrestrial ecosystems, but is much less comprehensive on the impact of the project on marine environments. It includes minimal surveys of the presence of marine species, but no analysis of impacts on:
  - migration patterns of bonefish, groupers, and snappers - all commercially-important species.
  - Marine mammals, whales, and dolphins.
- The mitigation measures outlined in the EIA are vague at best.
- Disney engaged in extensive outreach and community engagement on Eleuthera over the last two years (EIA 288-292). Yet Disney has refused repeatedly to engage with the Campaign's Bahamian partner groups. They also have not consulted with our technical experts, many of whom are leaders in their fields and have extensive experience in The Bahamas and at Lighthouse Point.

## Campaign Comments

### Inadequate Disclosure and Discussion of Economics

The EIA provides such limited economic information that it is impossible to verify the accuracy of Disney's claims that the port will provide economic benefits to the nearby communities, the island of Eleuthera, and The Bahamas. Thus, many Bahamians continue to question whether the cruise port is really a "good deal".

Disney has not released the 2018 Oxford Economics Study which supposedly substantiates their claims of economic benefits. To our knowledge, the only information that has been released is a very brief summary in the form of a powerpoint presentation which outlines takeaways, but does not provide the underlying analyses (see Appendix). **Disney needs to release the Oxford Economics Study so stakeholders can fully assess the validity of the economic benefits Disney has promised.**

Disney is investing up to \$400 million in the development at Lighthouse Point. Every bed aboard a Disney ship represents around \$237,000 in annual revenue. When multiplied by 3,500 passengers Disney can expect to take in revenues of \$830 million per ship, per year. The EIA states that the "project is conservatively expected to provide a \$805 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues" over a 25 year period. This amounts to an increase of only \$32.2 million in GDP and \$14.3 million increase in Bahamian Government revenues per year. **Disney needs to make clear exactly how this deal is fair to The Bahamas and the people of South Eleuthera.**

The EIA currently does not include information on expected increases in Gross National Income (GNI). The EIA only reports increases in Gross Domestic Product (GDP), which is essentially a useless measure. A significant, if not overwhelming, portion of this money could be going into the pockets of outsourced vendors from Florida or other nearby Disney associates, instead of into the pockets of Bahamians. As stated by Lawrence Pratt, a leading international expert in sustainable tourism economics, in his analysis of Disney's EIA, "GDP counts both costs and benefits as benefits (e.g. sales to tourists and disposing of tourists' waste), effectively 'double counting' the impact of development if further information is not provided. It is standard practice to detail direct, indirect and induced effects as well as estimated effects on tax revenues and value added in input-output analyses to shed additional light on the likely size of local net benefits and costs." He continued, "GDP is a measure of gross billing by the proponent, which is an accounting measure that has little relationship to Bahamian national accounts or in no way reflects the actual income effects in the country" (see Appendix).

Further, the EIA also provides no explanation as to how the reported GDP increase estimate was calculated. In fact, historic levels of onshore spending are considerably lower. As stated by L. Pratt (see Appendix) “To arrive at this gross sales number, the proponent is either:

- including all of its receipts from sales to guests, not just the portion that is territorial to The Bahamas
- using a level of guest spending much higher than observed in studies and reported by the industry
- considering a far greater guest level than that reported in the EIA itself
- claiming generous multiplier effects without explaining how this multiplier was estimated.
- or some combination of one or more of the above points.”

According to the Bahamian Minister of Tourism, Dionisio D'Aguilar, **75 percent of foreign visitors to the Bahamas are cruise passengers, but the cruise industry accounts for only 11 percent of overall tourist spending.** Traditional heads-in-beds tourists spend **20 times more** than cruise passengers, as has been publicly noted by the Minister of Tourism. Numerous economic studies substantiate the claim that stay-over tourism has far greater economic benefits than cruise tourism.

The point at the LHP site is a very popular attraction for stay-over tourists visiting the island in Governor’s Harbor or even as far up as Harbour Island. These tourists frequently drive the length of the island to visit Lighthouse Point because of its pristine natural beauty. These tourists constitute a vital portion of the southern settlement’s income as they stop for gas, refreshments, souvenirs, etc. **Disney’s EIA must consider studies to examine how development of the port will impact the likelihood of stay-over tourists, who are known to contribute more to the economy of The Bahamas, visiting the site and contributing to local businesses along the way. It must also outline project costs to local businesses.**

The EIA and the limited information we have received about the 2018 Oxford Economics study, do not address potential costs to local business. The EIA states that “the Developer will provide all citizens and residents of The Bahamas with full access to the property for non-commercial purposes.” This appears to exclude access to the area for independent local tour guides. Lighthouse Point is a major attraction for these businesses. At the April 8th DEPP public consultation at minute 01:10:40, the question of whether or not local bird and other environmental guides would be able to bring their own customers onto the site. Disney mentioned that they would hire Bahamians for their own shore excursions, but did not provide a clear answer as to whether or not local tour business would be able to operate independently at the site. As it stands, Disney has the liberty to determine the number of tour operators with which they will collaborate, if any, and there are currently no limits on the rate of commission that Disney can charge. **The EIA must include more specific information about their intentions for**

interacting with local business. It also must provide analyses of how their own operations will impact independent local businesses.

Furthermore, Disney announced a \$4 Billion dollar expansion with the addition of three new cruise ships. The Bahamas is critical to that objective. As it stands, Disney will pay no taxes on any kind of revenue, no real property taxes, and no import duties or tariffs for decades. Disney is at liberty to control the number of vendors allowed on site, as well as their location and merchandise. Disney has stated that they will hire as many as 150 Bahamians, but they have provided no guarantee. Taking all of these factors into account, Disney's EIA as it stands does not provide a sufficient analysis of how this is a good deal for The Bahamas. **The EIA must include additional studies that account for all of these factors, to show that The Bahamas will receive the economic benefits that Disney has promised.**

Disney has said that their proposed port is compatible with a Marine Protected Area, but has yet to demonstrate how this is the case. According to the [Economic Valuation of Ecosystem Services in Bahamian Marine Protected Areas conducted by BREEF, the Nature Conservancy, and the National Trust in 2017](#), the existing network of MPAs is worth \$6 billion per year in ecosystem services including crawfish habitat, shoreline protection, tourism and carbon storage. MPAs provide important sanctuaries to keep healthy populations of queen conch, grouper, spiny lobster, and other marine species that are commercially valuable. Fishing is the foundation of many Bahamians' livelihoods, and the industry is already under stress due to overfishing. Impediments to fisheries conservation efforts could have rippling economic effects. **The EIA must weigh the economic benefits of the cruise ship port against the benefits that the Lighthouse Point area would provide to The Bahamas as a Marine Protected Area.**

### **Consideration of Alternatives**

The EIA does not adequately consider alternative plans, which is an explicit requirement in the final draft of the 2020 EIA Regulations. Disney mentions that other sites were considered, including Egg Island. However, the EIA does not at all consider alternative developments at the selected site, as is standard practice for EIAs across the world and in the U.S., Disney's home country. Typically EIA's will consider multiple different construction scenarios, including a no-development scenario.

Disney continues to point to the higher impact marina project which was proposed more than ten years ago as the only other alternative, even though this plan was abandoned. Disney's EIA ignores the land-based, lower-impact, sustainable alternative that has been proposed by local groups. They do not at all consider [the low development, ecotourism plan which was put forth by the One Eleuthera Foundation and other successful Bahmian hotel operators](#), and subsequently

squashed by the Government. The EIA must consider the possibility of an even lower-scale, land-based, sustainable alternative.

Such an alternative concept was recently put forward by Chris Maxey, the founder of the Island School in Southern Eleuthera. Mr. Maxey recently wrote to Disney's CEO (See Appendix), Bob Chapek, asking him to consider cooperating with local organizations on a lower-impact, sustainable alternative that would better protect the environment and provide more jobs for Bahamians. Mr. Maxey did not receive a response.

James Lima, an international expert on sustainable development who has worked closely with local groups on Eleuthera, said at the April 15 extended public consultation (see Appendix): "we found that a plan centered around educational and ecotourism, stay-over-tourism, at a very small footprint of the site would generate 27 times greater economic benefit for The Bahamas than the proposed Disney plan."

Greg Miller, Executive Director, Center for Responsible Tourism, added in his comments: "Disney should be guided by global best destination selection and management practices, and reexamine alternative options including a more altered or degraded location, a land-based low impact option, and a no development option" (see Appendix).

Ben Simmons, a resident of Eleuthera and local business owner, added: "I own two small hotels on Eleuthera and I am a strong believer that small, low-impact development is key to a sustainable economy that employs more people and is better prepared to deal with economic shocks. South Eleuthera already has a cruise port at Princess Cay and actually has the highest number of visitors on the island, but none of the economic benefits have gone to the people who actually live there. Who's to say this is going to be any different? Disney needs to do better than what they are currently proposing."

Disney needs to conduct the analysis necessary to determine whether a lower-scale, alternative development option could better protect the environment and provide more jobs for South Eleutherans.

## **Inadequate Consideration of Climate Risks and Impacts**

The EIA claims that the “project is not expected to have a material impact on climate change”, but does not contain any studies or information to back up this assertion. Disney’s EIA for the Lighthouse Point project does not address climate risks - including storm surge and tidal flooding from expected sea level rise (see the independent technical review of the EIA by the Woods Hole Group in the Appendix). The EIA does not consider the value of the proposed Marine Protected Area (MPA) off of the Point as a “natural climate solution”. Disney also has yet to publish information about the carbon emissions associated with the project.

The minimal mentions of climate change in the document redirect to Disney’s overall 2030 Sustainability Goals. The goals of The Walt Disney Company at large to reach net zero emissions (which may also be inadequate) do not disqualify the need for responsible development by their cruise line at Lighthouse Point. The long-term climate change implications of the project require much more thorough analysis.

Nearly one year after Hurricane Dorian and at the start of another hurricane season, it is more crucial than ever that Disney seriously consider the impact of increasing storm frequency and intensity, as well as other consequences of climate change. As Dr. Adelle Thomas, a Bahamian human-environment geographer, stated, “[\*\*we cannot continue with a business as usual approach that has resulted in the devastation seen by Dorian, Irma and Joaquin.\*\*](#)”

Disney’s own 2009 Corporate Responsibility Report said that “current scientific conclusions indicate that urgent reductions in greenhouse gas emissions are required to avert accelerated climate change. Scarcity of natural resources and threats to ecosystems and biodiversity are serious environmental issues. **A successful response to these challenges demands fundamental changes in the way society, including businesses, use natural resources, and Disney is no exception.**” Still aware of the above-mentioned scarcity, Disney further recognized in 2019 that “strategic investments in natural climate solutions...protect natural resources and conserve habitats, as well as support local communities through economic development and employment.”

Disney should examine two main areas in its supplemental EIA with regard to climate change:

- 1.) The long-term contributions of the project to climate change and its impacts.

Disney has affirmed that the port is compatible with the company’s commitment to environmental stewardship and “**ensuring a world where wildlife thrives and nature is treasured and protected by: Saving wildlife. Inspiring action. Protecting the planet.**” However, Disney has yet to disclose how this will be accomplished at Lighthouse Point. To

properly address the environmental sustainability of the project, Disney must provide a thorough account of the cumulative impact of the port construction and operation. Disney must include in the EIA supplement a thorough assessment of the project's contributions to climate change, especially considering the particular vulnerability of The Bahamas to its impacts. This must include accounts of all emissions associated with the port's construction, operation, and decommissioning.

Cruise ships are well-known emitters of massive amounts of greenhouse gases. The emissions of one cruise ship in one day are equal to that of one million cars. Disney's new ships will burn LNG, which contains primarily methane, a potent greenhouse gas (GHG) that traps 86 times more heat in the atmosphere than the same amount of CO<sub>2</sub> over a 20-year time period. However, there is no mention in the EIA of the contributions of Disney's cruise ships to climate change. The EIA must examine the long-term impacts of emissions from the cruise ships that will pass through the port.

The proposed cruise port is an expansion of Disney's operations in The Bahamas, and will result in more ships, more passengers, and more pollution in Bahamian waters and coasts. Disney must address how this increase in operation will add to climate change impacts that have significant consequences for The Bahamas. For example, ocean acidification and warming caused by our changing climate have devastated Bahamian coral reefs and other marine life that hold significant economic value as food and tourist attractions. The EIA must examine the potential for its port to exacerbate this, and other problems associated with climate change.

Electricity at the port at Lighthouse Point will be produced onsite using solar power and generators with stored fuel. 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development. The EIA states that the feasibility of using a greater percentage of renewable energy is "being evaluated." This evaluation should have been completed before the release of the EIA.

Further, the EIA must examine whether the proposed project upholds or undermines the international commitments of the Government of The Bahamas (GoB). Most notably, the GoB enacted the National Policy for the Adaptation to Climate Change in 2005, committed to the Caribbean Challenge Initiative in 2013, and signed the Paris Agreement in 2015 in order to reduce emissions and protect the environment. The proposed project could damage the environment and aggravate climate change, meaning it also has the potential to compromise these commitments. Disney must provide a full account of how their proposed development and associated emissions will impact the ability of both the company and The Bahamas to meet these obligations. Further, Disney must assess the impact of the proposed development on the company's own goals to reduce emissions beyond 2020.

- 2.) The impacts of a changing climate and rising sea levels on the economics and long-term viability of the project.

[A 2018 study conducted by Climate Central scientists for the Inter-American Development Bank](#) recognizes The Bahamas as the most vulnerable nation in the Caribbean to sea level rise. In The Bahamas, 32% of land and 25% of the population are located in the most high risk areas, falling below 0.5 meters above the high tide line. [Moody's, a well-respected credit rating agency, identifies The Bahamas as among the top four countries forecast to be most affected economically by sea level rise, with damages from rising seas amounting to up to 15% of annual GDP.](#)

The anticipated physical and economic consequences of increasing storm frequency and intensity linked to climate change are also severe. Situated within warm Atlantic Ocean latitudes, The Bahamas is already particularly susceptible to hurricanes ([Shultz et al. 2020](#)). Recent projections published by the Caribbean Catastrophe Risk Insurance Facility suggest that with climate change and coastal agglomeration the costs of damages from extreme weather events could amount to losses of up to 9% of GDP annually by 2030 in the Caribbean ([Bresch & ECA working group, 2010](#)).

During a visit to The Bahamas after Dorian, [UN Secretary-General António Guterres said](#), "it's impossible not to be horrified by the level of destruction caused by Hurricane Dorian in the Bahamas. In the era of the climate crisis, natural disasters have become more frequent and devastating. It's time to change course and implement strong climate action now."

Coastal developments must fully consider the economics costs of damages associated with these issues. The impact of these issues on the project must be fully analysed in the EIA to assure that the project at Lighthouse Point is economically viable over the long-term. **Disney must conduct a thorough review of how these projected climate change impacts will affect the construction, operation, and economics of their proposed port, as well as the long-term viability of its infrastructure. To accomplish this, the EIA supplement must model sea level rise at Lighthouse Point. It must also assess and model intensifying hurricane conditions and their potential impacts on the proposed facilities and operations, taking into consideration potential hurricane-related damage to the surrounding natural environment.**

## **Impacts from Covid-19/Global Pandemics**

Since Disney's submission of the EIA, the world has faced an unprecedented global pandemic and economic shutdown. The Bahamas continues to suffer as the pandemic has severely curtailed transportation and the tourism industry on the islands, which accounts for 60% of the country's GDP. [In The Bahamas, economic losses from COVID-19 are predicted to be at \\$2.5 billion in GDP.](#)

Cruise ships were one of the most heavily impacted industries by the pandemic. Disney's own cruise ships reported hundreds of cases of Covid-19 and one fatality. Cruise ships are also linked to the spread of Covid-19 and to higher rates of infection in port employees and host island residents. [Cruise ship arrivals in countries like Mexico and Australia have been linked to much higher rates of infection, as there is high potential for the spread of disease between cruise ship passengers and port employees, as well as host nation residents.](#) A new cruise port at Lighthouse Point could make The Bahamas even more vulnerable to the spread of infectious diseases like COVID-19.

As you know, Eleuthera is a largely-rural, lightly-populated island with no hospitals, minimal medical resources, and limited infrastructure. The implications of a future pandemic at a cruise port at Lighthouse Point would likely be severe. The protection of facility employees and local residents against disease from thousands of visitors a week coming ashore at Lighthouse Point is crucial. While there is significant pressure to rush ahead with new developments as the Bahamian economy attempts to recover from COVID-19, it is crucial that the port is developed, responsibly and sustainably in the face of global pandemics of this kind.

Disney and the GoB must seriously consider the economic and public health dimensions of COVID-19 and other infectious diseases at Lighthouse Point. As such, **the EIA must include a comprehensive analysis of 1.) the impacts of COVID-19 on Disney's development, as well as the potential role of the Disney's ships visiting Lighthouse Point in the spread of infectious disease 2.) the capacity of South Eleuthera and its infrastructure to handle a public health crisis that may result from infectious diseases brought there by the proposed cruise port operations.**

## **Operational Impacts**

The EIA primarily assesses the environmental impacts of the construction of the cruise port, detailing how noise and waste pollution, physical disturbances, and other consequences will affect the area during this phase. However, there is little to no mention of the environmental impacts of 1 million visitors a year and long-term operation of the port. Long-term operational impacts are likely to be the most severe with a project of this size.

For example, there is no mention of the impacts of human foot traffic, sunscreen usage, energy generation, water consumption, water discharge, pesticide and other chemical usage, waste generation, and handling, etc. Potable water is to be obtained through desalination (reverse osmosis). This is a very energy intensive process, produces toxic wastewater and will likely have notable impacts. **The EIA must include analyses of the impact of increased foot traffic and its associated activities.**

A wastewater treatment plant will be constructed at the site. The EIA does not provide sufficient information about this process and its impacts. The EIA does not make clear if sewage will be treated to remove nutrients. As Dr. Thomas Goreau outlined in his comments (see Appendix), nutrient runoff poses the threat of harmful algae blooms, which cause mortality in reefs and other marine life. **The EIA must include 1) more specific information about the plan for wastewater treatment and 2) additional studies on the potential for harmful algae blooms or other environmental impacts from possible runoff.**

Food and some solid waste will be incinerated on site. This has known environmental impacts and releases harmful emissions into the air. The EIA states that the waste that is not incinerated will be returned to the ship for “appropriate disposal.” There is not clear indication as to what exactly this means. **The EIA must include more specific information about 1) how waste will be disposed and 2) the potential impacts of these disposal methods.**

The EIA does not address that there are two other cruise ports — Half Moon Cay, and Princess Cay — located within 11 miles of Lighthouse Point. The cumulative impacts of runoff, pollution, foot traffic, waste disposal, and other concerns from three ports within this proximity could be severe. **The EIA must include studies that analyze the impacts of aggregate port operations.**

## **Marine Protected Areas**

Disney must also examine the impacts of the port on the viability of Lighthouse Point as a Marine Protected Area. As we have previously addressed, 18,000 acres of ocean surrounding Lighthouse Point were officially proposed, due to their high biological value, as a MPA as part of The Bahamas' commitment to the Caribbean Challenge Initiative efforts to protect 20% of Bahamian marine resources by 2020. The designation of the area, which was put forth by the community and the Government, included extensive ecological studies and local consultation. The International Union for Conservation of Nature (IUCN) and the United Nations Environment Program have identified MPAs as effective climate change mitigation tools.

Disney has stated that their proposed port is compatible with a Marine Protected Area, but provides no proof that this is the case. **Disney needs to submit supplemental studies as part of its EIA to prove that this development is compatible with the protected status of a Marine Protected Area.**

## **Mitigation of Environmental Impacts**

The mitigation measures outlined in the EIA are extremely vague. The document provides no specific information about how mitigation will be accomplished. It does not include any details about how these measures will be implemented or analyses to determine their expected success rate. **A truly comprehensive EIA must include robust analysis of mitigation efforts in addition to just a list of the measures.**

Disney stated at the April 8th public consultation hosted by DEPP that this information is in the Environmental Management Plan (EMP). This document is not available to the public at this time. The public needs the opportunity to review and comment on both the EIA and the EMP before a decision is made by Disney and the Government. **Disney needs to release the EMP to the public and provide an additional public comment period for both the EIA and EMP.**

## **Corals**

The EIA's review of coral reefs is completely contradictory. It states that there are zero coral reefs in the project footprint. This completely discounts the fact that construction, operation and human foot traffic can have extensive impacts in surrounding habitats outside of the actual footprint. They also completely contradict this claim by then stating that they will use transplantation to mitigate damage to corals in the footprint.

The EIA provides a baseline survey of corals at the site and even mentions potential damages during the construction phase, but does not at all mention the impact of 20,000 visitors a week on the corals at the site.

We have consulted leading experts in Bahamian coral reef environments. Dr. Thomas Goreau, the President of the Global Coral Reef Alliance and Chief Scientist at Blue Regeneration, stated in his comments on the EIA: “the EIA describes the health of the coral reefs as only “fair”... but the survey omitted the areas of highest coral cover on the east side of Lighthouse Point. Because of their exceptional water quality and lack of human disturbance, these reefs are likely among the most pristine reefs left in the Bahamas” (see Appendix).

The corals at the site “are the only coral reefs in Eleuthera that are entirely up-current from sources of land-based pollution, and therefore of the highest national conservation importance” (see Appendix). An incredibly rare feature of the Lighthouse Point site is that “all three of the severely endangered *Acropora* elkhorn and staghorn coral species are found together in very shallow nearshore waters.” These species are very vulnerable and slight disturbances could have detrimental impacts. Potential disturbances from Disney’s proposed activities at LHP include:

- nutrient discharge to coastal waters from sewage
- turbidity caused by boat docking
- erosion of landfill beaches onto the reef

The EIA does not address the impacts of imported sand on coral reefs. As is outlined in Dr. Goreau’s comments (see Appendix), artificial beaches require imported sand to be dumped on the shoreline. Storm waves wash away this unstable sand, potentially burying offshore reefs. Given the increasing threat of storms as a result of climate change, this process is inevitable. **The EIA must include studies to analyze the impact of sand run from the artificial beaches.**

The EIA does not address the threat to corals posed by warm water expelled from the cruise ships at dock. As Dr. Goreau states, “Bahamian corals have large scale mortality from repeated high temperature bleaching events, and are on the edge of survival from global warming” (see Appendix). The EIA states that cruise ships at berth “will cycle approximately 5,000 cubic meters/hour of water through its internal system for cooling of chillers and other ship operations. The water is not mixed with any other systems or waste streams but will return the water approximately 5 degrees Fahrenheit (°F) warmer from intake to discharge.” Warmer water released into the ocean will add additional stress to corals located at the site and downstream. **The EIA must include analyses of the impacts of warm water runoff on corals and the associated threat of bleaching.**

**Disney needs to submit a supplemented EIA to 1) analyze the impact of up to four ships a week and 1 million visitors a year on the coral reef environments in the area 2) layout the mitigation**

measures that will be implemented to protect corals from the aforementioned risks and 3) prove that these measures will be effective.

### **Bonefish/Commercial Fisheries**

We have consulted leading experts in bonefish ecology in the waters of Eleuthera and at Lighthouse Point. These experts have identified major holes in Disney's analysis of the impacts of their project on economically important bonefish populations.

The EIA states that "the extent to which recreationally important bonefish species are utilizing the LHP marine habitats is not well known." According to Dr. Philipp, PhD, a scientific expert on bonefish, it is well-documented that LHP is a crucial habitat for bonefish migration. Lighthouse Point is located just a few miles from vital spawning sites for bonefish, grouper, and other commercially important species that may migrate over 100 miles to reach spawning sites. The southern tip of Eleuthera is likely an important landmark in the migration route. The proximity of the shoreline to the deepwater drop-off, and the existence of major gyre currents in the area, make the area ideal for the development of juvenile bonefish. Shoreline disruptions to this area, such as the construction of a pier and increased boat and foot traffic, will cause fish to abort this migration pathway, as has been observed at Castaway Cay. This would reduce reproductive success and recruitment. It is likely to cause significant damage to the bonefishing industry on Eleuthera and the economies of the Family Islands at large.

Disney's EIA does not include adequate pre-construction assessments of bonefish or other marine populations in the area or any post-construction plans to monitor the response of the fishery to the proposed development. Disney states that no bonefish were sighted at Lighthouse Point during their field surveys. This is likely due to the fact that bonefish pass through the shoreline of LHP on a seasonal basis, and only long-term studies can adequately assess their movements. Disney's study amounted to less than three days in duration.

Disney needs to submit supplemental studies as part of its EIA that 1) provide adequate pre-construction surveys of the bonefish, grouper, marine mammal, and other marine populations in the area, as well as nearby spawning aggregations 2) analyze how construction and operation will impact the survival, feeding, reproduction, and migration of these species 3) outline measures to mitigate impacts to these populations during and after construction.

## **LEED Certification**

LEED Certification is the gold standard for sustainable construction. Disney's EIA does not even mention the possibility of constructing all buildings to be LEED certified.

Disney's contractors are not listed even in the top 100 environmental consulting firms. If Disney is really planning to develop a forward-thinking, sustainable tourism operation, they should be consulting only the best of the best. **Disney's EIA must consider the possibility and examine the benefits of LEED certification for all on-site facilities.**

## **Lack of Consideration of Environmental/Social Justice**

Today more than ever, Disney should demonstrate sensitivity to systemic injustices and willingness to take action to address environmental and social justice issues. At a minimum, Disney should understand how its project could add to environmental, social, and economic injustices that are present in South Eleuthera. As it stands, the EIA does not even mention environmental or social justice.

Corporate inequality has recently come to the forefront of the public discourse across the world. In 2019, The Walt Disney Company's total revenue was reported at 65.39 billion U.S. dollars. In contrast, the communities of South Eleuthera are in critical need of economic growth, experiencing unemployment rates as high as 70-80%. Lighthouse Point needs to be developed in a way that is both sustainable and equitable. The EIA should consider whether in fact the proposed development for Lighthouse Point is, in its current state, a fair deal for The Bahamas and South Eleuthera.

As outlined in the above economics section, with the information that Disney has publicly released, it is still unclear how the economic benefits to the communities of South Eleuthera will be even comparable to the company's revenue from the port. In order to proceed responsibly and fairly, Disney must be explicit about how this deal is fair to The Bahamas and the people of South Eleuthera.

Further, environmental injustice is pervasive in The Bahamas. Environmental injustice specifies the reality that the most adverse impacts of environmental crises, pollution, and climate change are experienced by communities and countries of color. Hop Hopkins, the director of strategic partnerships for the Sierra Club, explained it clearly when he said: "you can't have climate change without sacrifice zones, and you can't have sacrifice zones without disposable people." As stated above, The Bahamas has been identified as the most vulnerable nation in the Caribbean, and one of the most vulnerable nation's in the world, to the impacts of climate change. This means that the Bahamian population is on track to be "disposed of" first. Disney

must analyze their contributions to climate change not just to account for their impact on the environment, but also to account for the potential perpetuation of this injustice.

Disney has chosen to develop their cruise port in one of the most economically depressed areas of The Bahamas. Disney is a major international corporation whose annual income is over five times the annual GDP of The Bahamas as a whole. The EIA must examine the economic benefits of the project to ensure an equitable deal. The EIA must include a full analysis of the economic equity of the project and any potential social justice ramifications. This must include analysis of 1) the contributions, for better or worse, of cruise port and cruise ship operations to environmental injustice and system inequality in The Bahamas 2) the comparative economic benefits of the cruise port for the company and the impoverished communities of South Eleuthera.

## **Overview of Still Outstanding Questions**

There are dozens of unanswered questions about the impacts of the proposed cruise port. Due to the time constraints, we have not been able to assemble a more comprehensive list; this list constitute just some of the issues that Disney and DEPP must still address:

1. When will Disney release the 2018 Oxford Economics Study, which contains the analyses that support the purported economic benefits of the project? Will this study be updated?
2. What are the expected increases in Gross National Income (GNI) from the proposed port?
3. Why didn't Disney release a draft Environmental Management Plan along with its EIA for its proposed project at Lighthouse Point?
4. The EIA primarily assesses the environmental impacts of the construction of the cruise port, but what are the environmental impacts of 1 million visitors a year and long-term operation of the port?
5. How will sunscreen usage from 1 million visitors a year impact the reefs, marine life, and coastal habitats at Lighthouse Point? How will Disney mitigate these impacts?
6. What are the projected environmental impacts of increased human foot traffic at lighthouse point? How will Disney mitigate these impacts?
7. What are the long-term environmental impacts of energy generation at the site?
8. What are the long-term environmental impacts of water discharge and waste generation and handling at the site?
9. What are the long-term environmental impacts of desalination (and the toxic wastewater produced by this process) at the site?
10. What are the long-term environmental impacts of waste incineration at the site? The EIA states that the waste that is not incinerated will be returned to the ship for "appropriate disposal." There is not clear indication as to what exactly this means. What is Disney's "appropriate disposal" method?
11. What is the level of emissions associated with the Disney cruise ships that will pass through the port? How will this contribute to climate change long-term?
12. Only 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development. Why has Disney only committed to 30% renewable energy sources? The EIA states that the feasibility of using a greater percentage of renewable energy is "being evaluated." This evaluation should have been completed before the release of the EIA and must be completed before a final decision is made on the project.
13. What are the projected increases in sea level at the site over the next 50 years? How will sea level rise impact the proposed port and its infrastructure long-term? How will this impact the long-term economic viability of the project? How will Disney mitigate these impacts?

14. What are the projected increases in storm frequency and intensity as a result of climate change in the area? How will increasing storm frequency and intensity impact the proposed port and its infrastructure long-term? How will this impact the long-term economic viability of the project? How will Disney mitigate these impacts?
15. Exactly how is this project compatible with the area's status as a proposed Marine Protected Area?
16. How will the port be impacted by Covid-19 or other future pandemics? Will Disney mitigate the threat of Covid-19 and future pandemics? How will Disney protect their passengers, employees, and residents of Eleuthera from this threat?
17. Disney has stated that they intend to have a seabed lease of an as-yet-undetermined area for \$1,000/acre/year (P. 6 HOA). Does Disney intend to restrict access to boat traffic to marine areas and beaches as they do at Castaway Cay?
18. How will Disney mitigate impacts to threatened Piping Plover populations?
19. How can Disney claim that the construction activities will improve the habitat for the Kirtland's warbler?
20. How will Disney address and mitigate impacts to other endangered and threatened species, such as endangered sea turtles that reportedly nest on Lighthouse Point beach?

### **Proposed Timeline for the Environmental Review**

Pursuant to these concerns, we would suggest the following recommended timeline for the further review of the EIA at Lighthouse Point:

1. Disney will prepare and publish a draft scope of work for supplementing its current EIA in order to address its numerous deficiencies. The supplement will include the Environmental Management Plan.
2. Disney and DEPP should conduct a public consultation on the final scope of work.
3. Disney will revise the draft EIA to 1) address public comments and input from scientists and experts and 2) supplement the EIA with additional studies required to adequately address issues raised in the public consultation period.
4. Publication of Disney's supplemental draft EIA for public review.
5. A secondary public consultation period.
6. Resubmission of the EIA and its consideration.
7. Decision on the Environmental Authorisation by the Department.

## **Conclusion**

This project constitutes a major turning point for Eleuthera, The Bahamas, and the cruise industry. The aforementioned revisions to the EIA are critical to ensuring that Disney and the Government make a well-informed decision about the future of Lighthouse Point. We stand ready and eager to assist with these necessary supplements. Please reach out to us at [lastchanceforlighthousepoint@gmail.com](mailto:lastchanceforlighthousepoint@gmail.com) if you have any questions, and we look forward to your response.

## Appendix

### Extended Public Consultations

April 15, 2021: Extended Public Consultation: Economics, Sustainability, Alternatives. [Link](#).

- Expert Speakers:
  - Dinah Bear, former General Counsel, U.S. President’s Council on Environmental Quality (CEQ)
  - Gregory Miller, Executive Director, Center for Responsible Travel (CREST)

April 22, 2021: Extended Public Consultation: Oceans, Marine Habitats, Climate Change. [Link](#).

- Expert Speakers:
  - Dr. Thomas Goreau, President of the Global Coral Reef Alliance; Chief Scientist, Blue Regeneration
  - Jacob Scherr, Former Director of Global Strategy and Advocacy, Natural Resources Defense Council

### Expert Comments

Comments submitted by:

Lawrence Pratt, Professor, Professor in Sustainable Development, INCAE Business School

- 1. The document presents a worrying lack of information economic impacts (both positive and negative) for the local economy and community.**
  - a. The EIA states a very large number claiming it as a contribution to GDP, and no other economic information is found. This is problematic and leads to gross misunderstanding of the real benefits and costs to the country and island. GDP counts both costs and benefits as benefits (e.g. sales to tourists and disposing of tourists’ waste), effectively ‘double counting’ the impact of development if further information is not provided. It is standard practice to detail direct, indirect and induced effects as well as estimated effects on tax revenues and value added in input-output analyses to shed additional light on the likely size of local net benefits and costs.
  - b. Claiming benefits in express economic and monetary terms without expressing the related costs in similar terms is highly misleading to readers and decision-makers.
  - c. GDP is a measure of gross billing by the proponent, which is an accounting measure that has little relationship to Bahamian national accounts or in no way

reflects the actual income effects in the country. This number greatly overstates economic impact of Disney's sales in the Bahamas as there is no reason to believe the actual sales, let alone the proceeds will remain in the country and it is unclear in the analysis presented. Based on analysis of other cruise ship tourism expenditures in the Caribbean, most visitor purchases are likely to take place on the ship or in Disney businesses on shore. As a result, a more correct gross number should be the incremental effect on Gross National Income (or Product) which measures the economic activity of Bahamian nationals wherever they reside and Bahamian businesses. This number too will likely overstate economic impact, but is at least a more defensible starting point.

- d.** Given that GDP is the only economic number presented, there is no explanation as to how the GDP number was calculated. Historic levels of spending shoreside are considerably lower. To arrive at this gross sales number, the proponent is either
  - i.** including all of its receipts from sales to guests, not just the portion that is territorial to The Bahamas
  - ii.** using a level of guest spending much higher than observed in studies and reported by the industry
  - iii.** considering a far greater guest level than that reported in the EIA itself
  - iv.** claiming generous multiplier effects without explaining how this multiplier was estimated.
  - v.** or some combination of one or more of the above points.
  - vi.** There is no information as to what cost to the country (national and island) this purported economic benefit is to be derived. Costs that need to be considered include: increase infrastructure spending (which, of course, also contribute positively to GDP estimates, but not necessarily to the wellbeing of Bahamians), costs of air pollution (from additional electrical generating capacity), tax benefits and concessions, loss of use of space by residents, among others.
- 2.** Lack of consideration of use of the affected area over time.
  - a.** The study is conducted for the construction phase, but makes little mention of the projected years of operations, and does not appear to consider the effect of high levels of visitation on critical and sensitive resources. While it may be conceivable that the construction phase has relatively small impact, it is difficult to imagine how the proposed level of visitation could have NO significant impact on sensitive environmental resources as well as cultural resources from hundreds of thousands of visitor days per year.
  - b.** Cumulative impacts are not considered – which appears to be a very critical oversight given the high levels of expected visitation and the long projected life of the project.

- c.** There is little to no analysis of impact variables from visitation, including the water discharges from hundreds of thousands of visitor days per year, air emissions from additional electrical production (or the sources of this energy and their local and climate change impact) and solid waste management over time.
  - d.** There is no discussion of costs associated with protection, maintenance, recovery or post-project restoration of affected areas. Establishing clear contingent costs and responsibilities for ongoing costs and closure costs is standard practice in most countries when dealing with projects with this level of impact.
- 3. Comparison basis best practices in EIAs require examining the proposed project versus some comparative scenario. The study does not clearly state what comparative scenario it is considering. If it is versus a “no-development scenario” it should be stated explicitly and present data to document that baseline. If it is versus some other scenario, it should be identified and an appropriate baseline established.
- 4. No consideration of social issues. There will be significant direct and indirect impacts to the local community, both positive and negative, including environmental health, access to natural and cultural resources, as well as changes to traditional employment. While this may not be explicitly required in EIAs in The Bahamas, it is a very noticeable absence in the overall picture put forth in the EIA.

April 22, 2021

Job No. 2021-0070

Marc Yaggi, President  
Waterkeeper Alliance  
180 Maiden Ln #603  
New York, NY 10038

## **Review of Lighthouse Point Environmental Impact Assessment**

Dear Mr. Yaggi:

Woods Hole Group reviewed the Environmental Impact Assessment – Lighthouse Point, Eleuthera, The Bahamas (the EIA) prepared March 2021 for DCL Island Development, Ltd. Our review of the EIA for the proposed development of a cruise port and entertainment destination at Lighthouse Point (the Project) focused on coastal processes and engineering, coastal hazards related to climate change, water quality, and project-related greenhouse gas emissions modeling. This letter summarizes Woods Hole Group’s comments on the EIA with respect to these subject areas. These comments were developed based on our experience in these subject areas, professional judgement, knowledge of the state of the practice, and expectations for the development of a complete environmental impact assessment.

Woods Hole Group is an international environmental services and products organization headquartered in Massachusetts, and with USA offices in Delaware, Maryland, and Texas. Woods Hole Group offers a range of Coastal, Ecological, and Oceanographic consulting services, along with products for collecting ocean measurements, ocean forecasting, tracking wildlife with satellite communications, and vessel monitoring systems for fisheries management. Woods Hole Group’s Environment & Climate Business Unit provides consulting expertise in coastal science, modeling, engineering, and planning, and regularly develops state and federal environmental impact statements for projects in the coastal zone. Our team is comprised of leading experts in coastal processes, sea level rise and storm surge modeling, resilient design and nature-based solutions, water quality modeling, and greenhouse gas assessment. We have deep experience in the engineering design of coastal infrastructure, dredging and beneficial reuse, beach and dune renourishment, as well as in environmental monitoring and sampling, and seafloor characterization.

Woods Hole Group’s review of the Lighthouse Point EIA identified the need for additional information, analysis and/or clarification with regard to coastal processes, sea level rise, storm surge, resilient design, water quality and greenhouse gas emissions. As detailed below, it is our view that the impact assessments for these subject areas are not sufficiently detailed or site-specific. Sound decision making for a major development project such as the one proposed for Lighthouse Point should be based on a complete and robust assessment of project alternative impacts.



## Coastal Processes

The EIA's review of existing coastal processes states "Baseline information is founded mostly on historical aerial photographs and verbal conversations with local residents familiar with the area." A **more comprehensive study of littoral transport and shoreline evolution** would typically be performed to inform existing conditions and the evaluation of proposed shoreline enhancement/management alternatives.

The proposed beach area enhancements include "Coastal stabilization structures...limited to upland areas only above the mean high water (MHW) line to contain the beach areas and minimize erosion." Further clarification on the need for these structures should be provided as it is stated "All these areas are relatively stable sand beach areas that naturally hold and accrete sand." The use of rock groin structures poses additional impacts in loss of beach habitat. A comprehensive study of coastal processes should be undertaken to inform the need for coastal stabilization structures above MHW in areas of beach expansion. Estimates of **longshore sediment transport rates and beach change with and without the proposed structures** would help determine the need for and potential influences to adjacent shorelines.

The location of the two bottom-mounted acoustic Doppler current profiler (ADCP) instruments is needed to better understand/interpret the wave and current data presented in the EIA.

In presenting impacts to beach enhancement areas, the EIA states "The expansion of beaches could have secondary impacts on some nearshore hardbottom, corals and submerged aquatic vegetation if subsequent shoreline erosion takes place." A **cross-shore sediment transport model** or related analysis would typically be conducted to assess the footprint and thickness of sediment transported from the beach to the nearshore zone during storm conditions. This is needed to better quantify potential secondary impacts of beach fill spreading on nearshore hardbottom, corals and submerged aquatic vegetation habitats.

## Sea Level Rise, Storm Surge and Climate Resilient Design

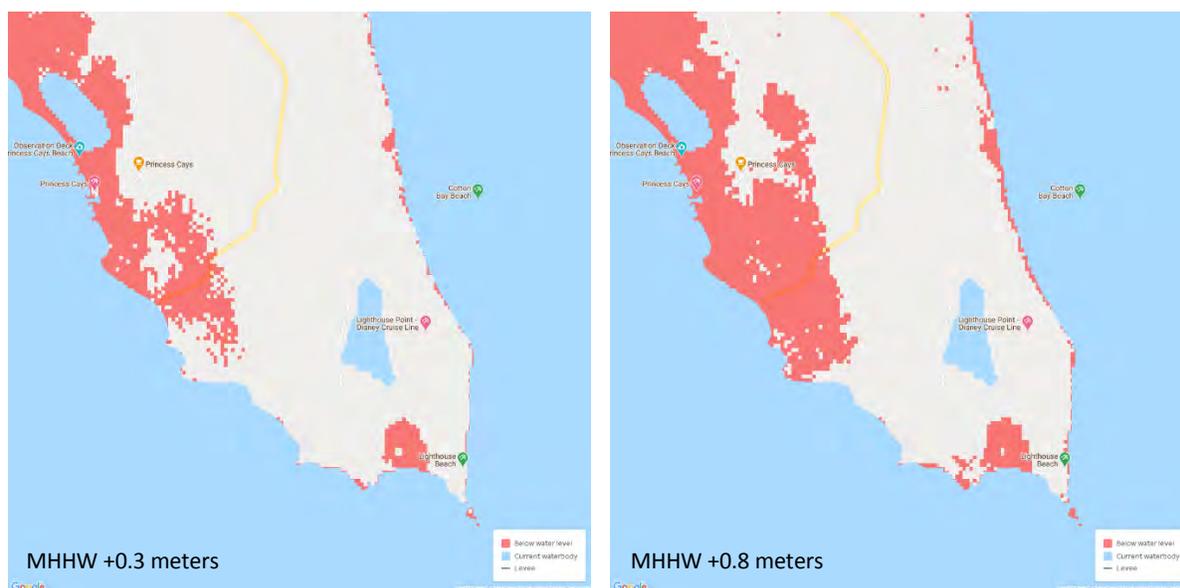
It is appropriate to assess the impacts of climate-related hazards over the design life of the project. Increasingly, states are requiring these types of assessments in environmental review for projects, and the Council on Environmental Quality recently re-released "2016 Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews" signaling broader commitment to incorporating these impacts into project decision-making.

Since the project has a stated design life of 50 years, the planning horizon for assessment should be approximately 2070 (2080 if construction is anticipated through 2030). The EIA uses a sea level rise projection of 1.0 foot relative to 2017 levels over the 50-year design life of the Project. Although this projection aligns with the projections presented in the 2014 Bahamas Second National Communication to the UNFCCC, it is not consistent with the current state of the practice in sea level rise planning.

Current best practice is to develop **local sea level rise projections using the "K14" (Kopp et al., 2014) approach which provides conditional probability distributions for different greenhouse gas emissions trajectories** and enables integration of these probabilistic projection into different scenarios to support asset planning and decision-making. This is the approach applied in the Fourth National Climate Assessment (Sweet et al., 2017) for the United States, adopted by multiple states for climate planning (including Massachusetts, California and New Jersey), and also used by Climate Central to develop projections for the Caribbean (Strauss and Kulp, 2018).



For example, the Climate Central probabilistic sea-level projections for Settlement Point, Bahamas are 0.28 to 0.32 meters above the baseline (year 2000 mean sea level) for the range of 2050 emission scenarios and 0.54 to 0.83 meters above the baseline for the range of 2100 emission scenarios. Thus, the 1.0 foot relative to 2017 used in the EIA is likely on the low end of possible sea level rise projections over the stated design life even when not accounting for contributions from ice sheet melt. The EIA should **present the range of potential sea level rise scenarios over the project design life overlaid with the development plan** in order to visualize the potential impacts. For instance, the following figures show areas of inundation 0.3 meters and 0.8 meters above the present local mean higher high water (MHHW). Review of these maps suggests that the proposed South Family Beach area south of Shad Pond and White Pond is particularly vulnerable to future tidal inundation over the stated life of the development.



For regional context, the **Southeast Florida Regional Climate Change Compact** (the Compact) released updated **Unified Sea Level Rise Projections** in 2019. The Compact states that “by 2070, sea level is projected to rise 21 to 54 inches above 2000 mean sea level” (MSL) and recommends that **projects with a planning horizon up to 2070 plan for sea level rise between the IPCC Median and NOAA Intermediate High scenarios (21 to 40 inches or ~0.5 to ~1.0 meter above 2000 MSL)**.

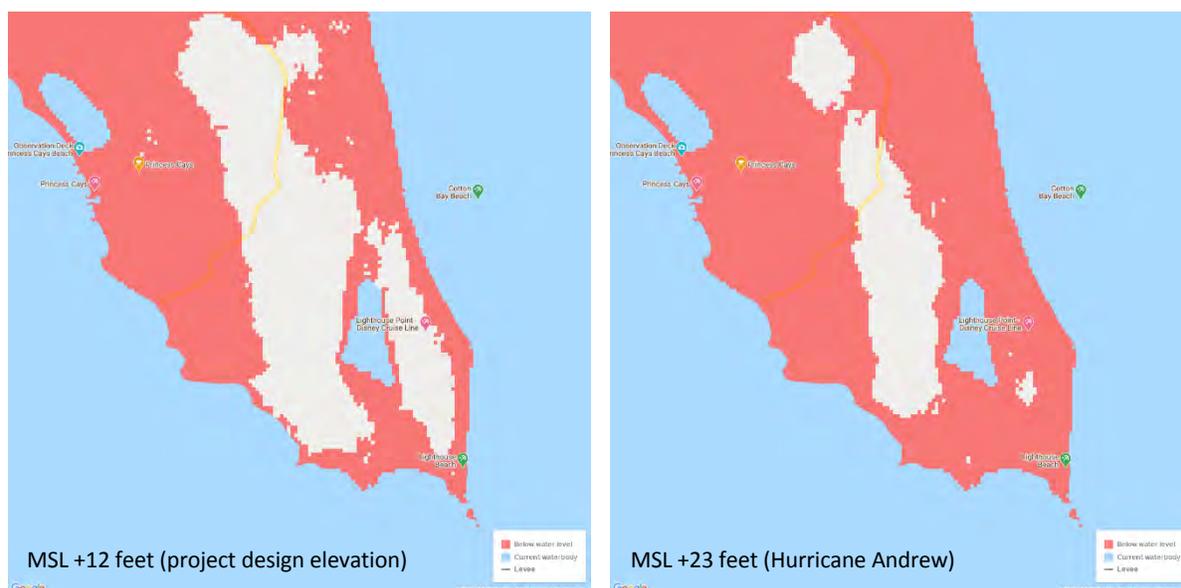
As noted in the EIA, storm surge is a significant vulnerability for Lighthouse Point, which experiences hurricane-related impacts once every 2.85 years and a direct hit once every 9.57 years, on average. The quantitative review of recent storm events in the EIA does not include Hurricane Dorian and its impacts on Eleuthera. Hurricane Dorian is noted as having a major impact in the Bahamas, but storm surge is not provided for comparison to other events. This would provide an additional (and recent) historical account of the potential flood risk at Lighthouse Point to better inform design criteria, siting of critical infrastructure, fuel and chemical storage areas.

A **map of potential storm surge with projected sea level rise over the 50-year design life of the project** should be included in the EIA. Potential sources of probabilistic extreme storm water levels for the area include the recent **US Army Corps of Engineers South Atlantic Coastal Study** or **FEMA’s South Florida Study**. Project elements overlaid on this map would help to determine the need for a more detailed vulnerability assessment.



The EIA states that the Project will be designed to “withstand any impacts due to climate change” but specifies only that structures will be elevated at or above elevation 12 ft MSL. According to the project site tidal datums reported in the EIA, 12 ft MSL correlates to approximately 10.5 ft above MHHW. This vulnerable area should be overlaid with project development plans to determine the vulnerability of project elements, and the return period of such a storm event should be stated in order to assess risk. Initial mapping suggests that, **contrary to the EIA’s statement regarding locating development above vulnerable areas, project related development is proposed within this vulnerable area at or below 12 ft MSL**, as shown below.

The stated design flood elevation of 12 ft MSL is also lower than stated historical storm surge levels. A complete assessment of storm surge vulnerability would include, at a minimum, a map of the inundation from the surge associated with the storm of record or the results of NOAA Sea, Lake and Overland Surges from Hurricanes (SLOSH) model results for the area. **Based on the storm surge reported in the EIA from Hurricane Andrew (1992), a 23 ft storm surge at Lighthouse Point would overwhelm the project area** as shown below. Careful consideration of storm-related vulnerabilities is critical to making planning and design decisions in areas that are exposed to hurricanes.



Since there is present risk of flooding and damage, which will be accentuated in the future with climate change, the impacts due to climate change should be estimated for the stated design flood elevation for the Project. We recommend **appropriate design flood elevations for roadways, buildings and infrastructure be developed based on a review of the storm of record as well as an assessment of regional sea level rise, probabilistic extreme storm water levels, and extreme wave conditions**. It was noted that extreme wave conditions were not quantified in the EIA. A review or study of expected extreme wave conditions is needed to ensure resiliency measures and structures will be designed to withstand wave forcing (in addition to wind and storm surge levels).



## Water Quality

For the proposed Reverse Osmosis (RO) water treatment facility, the EIA states “Brine that is a by-product of the RO system will be discharged through groundwater injection or offshore, pending final Project design.” Depending on the method selected for discharge, there will be impacts to groundwater resources and/or nearshore water quality. The EIA should clarify these potential impacts and, pending the selected design, the **zone of influence or mixing zone should be determined in the receiving water** to quantify the impacts and the potential need for mitigation measures, such as diffusers and/or locating the discharge to minimize resource impacts.

## Greenhouse Gas Emissions

The EIA states that the Project will not have a “material impact” on climate change and estimates Project related greenhouse gas emissions at 3,100 metric tons CO<sub>2</sub> per year, but there is no detail provided to substantiate this estimate or put it into context to evaluate the materiality of the impact. It is unclear what emissions are included in this figure.

Standard guidance in many states requires project proponents to calculate the greenhouse gas emissions related to project operation (and in some cases from construction). The types of emissions typically quantified fall into two categories – Scope 1 and Scope 2. Scope 1 emissions are direct emissions that occur on site from sources that are owned or operated by the organization (e.g. fuel combustion for heating, from company owned vehicles, or gas-powered landscaping equipment). Scope 2 emissions are indirect emissions that are associated with the use of electricity or steam generated off-site.

Scope 3 emissions include those emissions not in Scope 1 or 2, not under the direct control of the organization but related to its operation (e.g. employee commuting, supply chain, visitor trips, solid waste management). Although Scope 3 emissions are generally not required in EIA greenhouse gas assessments, they can represent a large portion of overall project life cycle emissions depending on the nature of the project. At a minimum, the **EIA should define the boundary of the emissions calculation, detail the assumptions used in the calculation of Scope 1 and 2 emissions, and address (at least qualitatively) Scope 3 and construction-related emissions.**

The EIA states that the Project will reduce carbon emissions by incorporating sustainable design, building, and management practices. Aside from a commitment to 30% renewable energy, no project specific sustainability initiatives or certifications are noted. More **detail on the Project’s sustainability commitments** should be provided. For instance, design and management choices may impact energy use, water use, material consumption and/or waste generation, and ultimately Project-related emissions.



## Summary

In summary, based on the review of those EIA elements that align with Woods Hole Group's technical expertise and experience preparing similar environmental documents for state and federal applications in the United States, we conclude that more detailed and site-specific data and analyses are required to complete this EIA. Without this additional information, it is not possible to evaluate or substantiate the claims the proponent has made in the document as submitted March 2021. Woods Hole Group would welcome the opportunity to discuss these technical recommendations with the proponent.

Respectfully submitted,

Matthew Shultz, P.E.  
Senior Coastal Engineer

Joseph Famely  
Senior Environmental Scientist



## References

Commonwealth of the Bahamas. 2014. The Second National Communication of the Commonwealth of the Bahamas under the United Nations Framework Convention on Climate Change. September, 2014.

Kopp, R. E., R.M. Horton, C.M. Little, J.X. Mitrovica, M. Oppenheimer, D.J. Rasmussen, B. Strauss, C. Tebaldi. 2014. Probabilistic 21st and 22nd century sea-level projections at a global network of tide-gauge sites. *Earth's Future*, 2(8), 383-406.

Southeast Florida Regional Climate Change Compact Sea Level Rise Work Group. 2020. A document prepared for the Southeast Florida Regional Climate Change Compact Climate Leadership Committee. 36p.

Strauss, B. and S. Kulp. 2018. Sea-Level Rise Threats in the Caribbean – Data, tools, and analysis for a more resilient future. Prepared by Climate Central for Inter-American Development Bank.

Sweet WV, Kopp RE, Weaver CP, Obeykera J, Horton RM, Thieler ER, Zervas C (2017) Global and regional sea level rise scenarios for the United States. Silver Spring, MD.



Center for Responsible Travel

## Center for Responsible Travel

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[www.responsibletravel.org](http://www.responsibletravel.org)

April 15, 2021

### **Independent Review of the draft Environmental Impact Assessment (EIA) on Lighthouse Point, Bahamas**

At the request of the *Last Chance for Lighthouse Point* campaign, the Center for Responsible Travel (CREST) was asked to undertake an independent review of the referenced draft EIA for Lighthouse Point (LHP), Eleuthera Island, Bahamas. CREST has considerable technical and economic analysis experience related to the cruise industry globally, with considerable cruise tourism expertise and publications in the greater Caribbean and Bahamas ([CREST](#)).

CREST has made a critical analysis of the draft EIA's adequacy regarding sustainable tourism, destination stewardship, climate change, and economic benefits of the project. The draft EIA outlines several positive and innovative construction measures for the docking facilities and the DCL cruise ships themselves are some of the most efficient operating in the Caribbean. However, we find that the draft EIA is flawed, does not meet international standards for sustainable tourism and destination stewardship<sup>1</sup> and is inconsistent with Disney's global sustainability brand. Tourism, when done right, provides many benefits for destination communities, businesses, and travelers. However, we need to use this COVID "tourism reset" opportunity to take a hard look at past unsustainable practices from the cruise industry in the Caribbean and consider how to build back better through a stewardship approach.

The draft EIA makes frequent mention of "best management practices" or BMPs that will be outlined in the Environmental Management Plan (EMP), but no such draft EMP is available to the public. Without an EMP, it is impossible to assess Disney Cruise Line's (DCL) proposed mitigation plans or determine if sustainable tourism, biodiversity, and cultural resources BMPs are even being considered. The EMP is essential and must include rigorous BMPs that meet destination stewardship criteria at the highest standard to address visitor distribution, coastal/reef protection, wildlife monitoring, renewable energy, overfishing, water and air pollution, and waste management.

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<sup>1</sup> Destination stewardship is defined by the Global Sustainable Tourism Council ([www.gstcouncil.org/](http://www.gstcouncil.org/)) as "a process by which local communities, government agencies, NGOs, and the tourism industry take a multi-stakeholder approach to maintaining the cultural, environmental, economic, and aesthetic integrity of their country, region, or town." For CREST it is all about ensuring that the destination retains and enhances the distinctive attributes that make it attractive to beneficial tourism. This means protecting the very qualities that make a place like Eleuthera first and foremost a wonderful place to live, with the added benefit of being a wonderful place to visit.

Keeping in mind this critical gap in knowledge, CREST is still able to provide the following assessment for consideration.

### **Disney Commitment to Sustainability**

The Disney Company's 2030 sustainability goals outline DCL objectives that are more in line with a "building back better" sustainability approach. Overall, Disney Cruise Line's commitment to sustainability and leadership has earned it the highest rating from the Friends of the Earth annual cruise ship report card (though DCL dropped from an A- to a B- in 2020 due to their handling of the LHP project in question). Disney remains the highest rated cruise ship company, but is not in great company as only 2 of 18 cruise ship companies (Disney and Silversea) earn a rating higher than a "D." <sup>2</sup>

"The Walt Disney Company is committed to protecting the planet and delivering a positive environmental legacy for future generations as it operates and grows its business. WDI is dedicated to leveraging creativity, innovation, and operational excellence to being good stewards of the environment, and to inspiring its employees, guests, and business associates to protect the planet it shares, and the company's commitment is represented in this Project. <sup>3</sup> We approach new projects with a long-term strategic vision that involves partnering with government leaders, conservation experts, local communities, NGOs, and other stakeholders. Our intent is to approach the Lighthouse Point project with the same level of environmental stewardship and sensitivity we bring to other Disney projects around the world."<sup>4</sup>

Up to now, DCL has had a generally good record of operations in the Caribbean. That said, virtually all proposed tourist activities outlined in the draft EIA represent unsustainable mass tourism options that lack innovation and are more consistent with an amusement park than a future-thinking, sustainable tourism destination model. The draft EIA estimates that between 624,000 and 1,040,000 annual visitors will descend on the 154 acres of developed land and coastline, with rather standard tourism offerings around sun and sand, thrills, and no emphasis on ecotourism or cultural tourism options. The high tourism density proposed by Disney conflicts with their corporate sustainability goals and is a recipe for degradation and overtourism<sup>5</sup> at Lighthouse Point. Without significant modifications, it is likely that the activities outlined in the draft EIA could trigger intense ecological pressure with myriad negative impacts.

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<sup>2</sup> For more information, [www.foe.org/cruise-report-card](http://www.foe.org/cruise-report-card)

<sup>3</sup> Draft EIA for Lighthouse Point, Eleuthera, The Bahamas, pp 254 March 2021

<sup>4</sup> Exhibit A Disney's Global Commitment to The Environment and Conservation: Draft EIA for Lighthouse Point, Eleuthera, The Bahamas, March 2021

<sup>5</sup> **Overtourism** is tourism that has moved beyond the limits of acceptable change in a destination due to overcrowding from visitors, that can overwhelm a destination and its resources, leading to degradation or destruction of a destination's natural and cultural resources.

## Lack of Consideration of Alternative Options

Upon review of the EIA and other documents, CREST noted only brief mention of Disney's consideration of other alternative locations:

"The Developer explored several alternative locations prior to purchasing the Lighthouse Point property. These locations included Egg Island, Eleuthera; Morgan's Bluff, Andros; West End, Grand Bahama; and various parcels within the Berry Islands. These alternative site locations were rejected due to the potential for significant environmental impacts or operational constraints for cruise ships and other factors. The Lighthouse Point property met Developer needs with the least environmental impact, while providing access to deep water. The commitment to an open trestle pier/berth design allows access to deep water and eliminates the need for dredging, which is generally associated with a greater environmental impact."<sup>6</sup>

Lighthouse Point is a fragile, nature-rich location, with proximity to a proposed marine protected area (MPA). However, LHP is now threatened by damaging impacts from mass tourism activities proposed in the EIA. CREST is concerned that DCL has not adequately explained the process, criteria, and overall results of the alternative location analysis. Consideration of alternative plans was an explicit requirement in the final draft of the 2020 EIA Regulations. We believe that Disney should be guided by global **best destination selection and management practices, and reexamine alternative options including a more altered or degraded location, a land-based low impact option, and a no development option**. Best management practices are expected standard practice by an international brand of such high prestige as the Disney Company which, in turn, should guide DCL away from the mass tourism and amusement park approach proposed in the draft EIA.

## EIA Ignores the Impacts of Proposed Tourist Activities

CREST has identified several negative impacts of concern, where in many cases, the draft EIA does not adequately acknowledge or even address them. These include: poor visitor dispersal; noise, water, and air pollution; habitat degradation (land and marine); toxicity to corals from sunscreen; stress on endemic flora and fauna (with several species IUCN rated threatened and endangered); resource overconsumption; high fossil fuel use for energy generation (70%); unknown waste management protocols; and an alarming dependence on waste burning/incineration.<sup>7</sup>

As outlined in the draft EIA, the undeveloped LHP area would be overwhelmed by tourists as cruise visitation explodes from the hundreds to the many hundreds of thousands of visitors per year. With perhaps 20,000 weekly visitors envisioned, the LHP project would have annual cruise visitation numbers

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<sup>6</sup> Draft EIA Lighthouse Point Eleuthera, The Bahamas Executive Summary, March 2021

<sup>7</sup> Proposed annual visitation of between 624,000 and 1,040,000 tourists will generate considerable solid and human waste. The EIA describes a considerable dependence on waste burning/incineration with no mention of the considerable negative environmental consequences, including: burning of fossil fuels to burn trash, air and water pollution, GHG emissions, and the potential environmental and health risk to tourists and local residents on Eleuthera and adjacent islands.

comparable to pre-pandemic levels in Key West, Florida,<sup>8</sup> and Costa Maya, Quintana Roo, Mexico. There is no established carrying capacity baseline for LHP and the draft EIA does not present the full picture of project impacts from design, construction, to proposed site operations (see below) nor the long-term impacts of climate change on the proposed project footprint and GHG contributions. Irreparable land and seascape transformation and overall environmental degradation is a real possibility both within the project footprint as well as in ecologically significant surrounding marine habitat. Disney should commit to the establishment and monitoring of carrying capacities and visitor density and distribution, with longer term planning providing a vision for site sustainability—a sufficient EIA would have considered these essential elements to sustainability and resource protection.

The draft EIA ignores the negative environmental impacts of these tourist excursions on the environment, wildlife, and ecological integrity of LHP and the surrounding marine areas. Potential long-term negative impacts on marine mammals, corals, finfish populations, and overall ecological integrity of the marine environment are dismissed in the EIA with unsubstantiated claims that the project will have no impact on land or marine biodiversity. We particularly take exception to the March 10, 2021 DCL press notice that has the false and misleading headline, “EIA shows “no loss of biodiversity” expected for DCL’s proposed LHP Project.”

On-land impacts of nearly one million visitors per year is dismissed in the EIA as not having a negative effect on the environment or biodiversity. However, CREST anticipates that the extremely high visitor density on such a small and fragile area will result in significant negative impacts from human foot traffic, waste generation, water purification and consumption, energy generation and sunscreen usage toxic to corals. In addition, we are alarmed by watercraft excursion activities proposed in the draft EIA that present considerable risk to the ecology of LHP and surrounding areas.

Personal Watercraft (PWCs): or “Jet Skis” is a proposed “thrill-seeker” activity that one would find in a high density, already degraded marine amusement park area, not a pristine, currently wild corner of the Bahamas. PWCs are a scourge on the environment, as they contaminate the water and air, create serious negative impacts on birds (nesting, feeding, and displacement), and can operate in shallow near-shore marine habitats that results in serious shoreline erosion, turbidity, and sedimentation problems in shallow productive waters like those found at LHP. The EIA estimates that DCL will be at LHP for 3 to 5 days/week year-round, which if operating just 20 PWCs on-site, will translate to between 2,730 gallons and 4,550 gallons of gas and oil spilled in the inshore waters.<sup>9</sup> In this example, these same 20 PWCs would also emit

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<sup>8</sup> As of November 3, 2020, Key West residents passed 3 referenda, approved by 60 percent or more, to limit the number of cruise passengers disembarking to 1,500/day, to limit the capacity of cruise ships calling in port to 1,300 people, and to give priority to ships with the best environmental health and safety records. Based on CREST’s 2019 research in Key West, it is likely that these regulations stemmed from growing citizen remorse around cruise tourism’s overtourism impacts.

<sup>9</sup> It is estimated that a PWC “thrill ride” of 2 hours duration dumps on average 3.5 gallons of oil and gas as part of regular operations. Operating 10 hours/day, this translated to 17.5 gallons of gas/oil dumped as an operations by-product. Compounded over a range of minimum 156 days to maximum 260 days of operations at LHP, this means PWC operations would dump between 2,730 to 4,550 gallons of gas and oil per year.

smog/GHG into the currently clear air of LHP equivalent to the emissions of between 3,120 and 5,200 passenger cars each driven 100,000 miles.<sup>10</sup>

Banana Boat Rides and Fishing Boats: the EIA does not specify the scale of thrill-seeking banana boat rides and fishing excursions for cruise passengers, but these activities will result in considerable negative impacts including: water, noise, and air pollution; potential reef disruption and damage; overfishing (bonefish, groupers, and snappers are all commercially important species in the area) and disruption to off-shore pelagic ecosystems as a result of tuna and other deep-sea trophy fishing.

### **Lack of Specifics on Economic Benefits**

Disney has shown considerable corporate interest in being a leader in sustainability. However, the draft EIA conflicts with this interest and does not consider sustainable tourism or community-based economic development. The EIA lacks any details that explain the economic benefits projections, and there is no way to determine what the actual economic benefits will be for local communities on Eleuthera, one of the most economically depressed areas of the Bahamas. CREST stands ready to work with Disney Cruise Lines to champion responsible tourism development at LHP and throughout the Caribbean leading to a responsible post-COVID recovery. CREST encourages DCL to lead by example and hold itself to a higher standard by providing a more transparent economic analysis and projections.

The draft EIA and other DCL documents state that the LHP project will generate an \$800 million increase in Bahamian GDP and a more than \$355 million increase in Bahamian government revenues over a 25-year period. Unfortunately, the EIA does not make the case for narrowing the wealth gap and improving the wellbeing and economic benefit of local communities. There is a genuine risk of economic leakage with most of the economic benefits received by others outside Eleuthera and The Bahamas. This is a significant problem with the cruise industry in general, and a key goal for a responsible recovery is to ensure fair and equitable economic benefits for local communities. CREST supports the recommendation to release the Oxford Economics Study results and the methodology used to produce these results so that all stakeholders can review the details and determine the validity of the claims of considerable community economic benefits.

Finally, more detailed targets should be cited within the EIA that solidify the role of the local community within port operations. Similar targets that have been established in the construction process (overall ratio of 80 percent Bahamians) should also be created for ongoing employment in port operations, as well as for the other socio-economic commitments that do not currently establish concrete dimensions for success. Disney must also ensure that all port employees and local third-party vendors are subject to fair wages and just bargaining processes.<sup>11</sup> Markers should be established to determine the ratio and

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<sup>10</sup> A single 100 horsepower PWC one day's operation (10 hours) emits the same smog/GHG as driving a new passenger car 100,000 miles. 156 days x 20 PWC = 3,120; 260 days x 20 PWC = 5,200.

<sup>11</sup> CREST's 2019 book, *Cruise Tourism in the Caribbean: Selling Sunshine*, revealed that an estimated half of what the cruise passenger spends for excursions and in recommended stores is kept as commissions by the cruise line or

revenues of duty-free shops and international brands to local shops and vendors in port, as to maximize benefits to the local economy and reduce economic leakage.

It is not too late to support an enhanced level of cooperation amongst Disney, Bahamian government agencies, local communities, and NGOs for this project. At CREST, we encourage the redesign of this project that meets the new normal of sustainable tourism, more equitable economic benefits, and genuine destination stewardship. The world is watching, and the Disney Company has the opportunity, and responsibility, to develop a true, sustainable tourism destination model for cruise tourism.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory Miller", with a horizontal line extending to the right.

Gregory Miller, Ph.D.  
Executive Director  
Center for Responsible Travel

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its agents. Additionally, anecdotal stories collected by CREST in various Caribbean port-of-call showed that third-party operators often entered a “race to the bottom” to be contracted by cruise lines.

EIGHT SIGNIFICANT PROBLEMS WITH THE ENVIRONMENTAL IMPACT  
ASSESSMENT DOCUMENT FOR THE PROPOSED LIGHTHOUSE POINT PROJECT

Dinah Bear, Esquire\*

Thank you and greetings to everyone. I am going to briefly outline 8 major problems with the document characterized as the Environmental Impact Assessment for Disney Cruise Line's proposed Lighthouse Point development.

1. *Purpose of EIA*: This document suggests a fundamental misunderstanding of the purpose of EIA. The purpose is not to document the impacts of a decision that has already been made and suggest a bit of mitigation. Rather, the highest purpose of EIA is to evaluate the environmental and related social and economic impacts of a proposed action and alternatives to that action to inform decisionmaking. As it stands, the document does not conform to international and U.S. standards for EIA.

2. *Alternatives*: Everyone thinks about alternatives when they make personal decisions. And indeed, we are told that Disney considered alternative locations for this proposed project. But this isn't just a private decision – it's a public one that will affect the communities, wildlife and environment of this island for a long time, possibly centuries. The EIA needs to identify both site and project alternatives and analyze their impacts for public review and comment. Alternatives are a required part of EIA in many contexts, including implementation of international agreements to which the Bahamas is a party – The Convention on Biological Diversity and the Ramsar Convention on wetlands. And it's the Bahamian law!

3. *Scope of Analysis*: The preponderance of effects analysis and mitigation measures in this document focus on construction of the project. Those are important effects, but the longest lasting effects may well be from the presence of thousands of people recreating in the area and the necessary support systems, such as transportation, to keep the resort. That analysis is woefully lacking.

4. *Cumulative effects/climate*: To properly analyze such effects, the EIA should identify not only the environmental baseline and the effects of construction and operations of the proposed resort, but also analyze those impacts along with the synergistic effects of other actions occurring now and in the foreseeable future that will affect this part of Eluthera. An overwhelmingly significant aspect of such analysis must be related to climate change, including sea level rise – not just the impacts of the project on climate change, but very importantly here, the effects of climate change on affected resources, such as fish stocks, and on the project itself.

5. *Missing baseline data*: The document reveals some very important gaps in baseline information – for example, do sea turtles nest on these beaches? What are the migration patterns of bonefish and how will they be affected? Are there coral reefs within the project footprint? How will the project likely affect island communities? The document has 3 paragraphs on surrounding communities that explain where the Bahamas and Eluthera are and the size of the human population. This is totally unsatisfactory. The EIA should include analysis of the likely impacts of the project on the culture and social structure of the island, as well as the economic effects.

6. *Secret studies*: Then there is analysis that apparently has been done but that has not been shared with the public. For example, Appendix H presents summary tables and charts of the economic study but not the study itself. Why not? Does the study address only beneficial impacts of the project?

7. *Superficial or no analysis*: The analysis of effects is quite superficial for a number of issues and focuses primarily on positive impacts. For example, for the proposed transformation of the road leading into the project area from a road that currently a road that will have the capacity to service more than 15,000 vehicles a day through dry, broadleaf evergreen forest, the analysis is “greater mobility”; not a word about the effects on the forest.

8. *Mitigation suggestions*: The document promises much in the way of mitigation . . . much of it to be developed sometime in the future . . . and much of it presented as options, to be informed by an Environmental Management Plan (EMP) and adaptive management. But the document fails to provide for an adequate foundation for adaptive management and the purpose of an EMP by failing to provide adequate analysis to set responsible benchmarks. It remains unclear what Disney is actually committing to in the way of mitigation and what the likely effects of the mitigation might be if implemented.

**Conclusion**: This is a very disappointing show by such an iconic American company that has long been identified with spotlighting nature. The Walt Disney Company has said that it would approach this project with the same level of environmental stewardship and sensitivity that it brings to other Disney projects around the world.” I can say with confidence that this document would never be published in the shape that it’s in right now in California, the birthplace of Disneyland and the Disney company.

**RECOMMENDATION**: A revised or supplemental EIA document informed by comments and expert analysis on this draft should be circulated for public review and comment.

\* *Credentials*: Ms. Bear oversaw the implementation of environmental impact assessment procedures in 85 federal agencies in the United States for 25 years, as Deputy General Counsel and General Counsel for the President’s Council on Environmental Quality. Additionally, she headed exchanges on environmental law and environmental impact assessment with Japan and the USSR and was involved in international negotiations regarding environmental impact assessment. She independently reviewed this document at the request of Waterkeepers Bahamas.

#### References:

*United Nations Environmental Programme, Goals and Principles of Environmental Impact Assessment*

*Principles of Environmental Impact Assessment Best Practice*, International Association for Impact Assessment, in cooperation with Institute of Environmental Assessment, UK

*Directive 2011/92/EU of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU*

*Strengthening Environmental Impact Assessment: Guidelines for Pacific Island Countries and Territories*, Secretariat of the Pacific Regional Environmental Programme, United Nations Environmental Programme

*Environmental Impact Assessment and Strategic Environmental Assessment*, Convention on Wetlands

*Biodiversity-Inclusive Impact Assessment in the Context of the Convention on Biological Diversity and the 2030 Agenda: Ways Forward*, Secretariat of the Convention of the Convention on Biological Diversity

Environmental Impact Assessment Regulations, 2020, Official Gazette, The Bahamas, Reg. 5(2)), 2<sup>nd</sup> Schedule, 9/15/20.

National Environmental Policy Act

Environmental Impact Assessment of Nongovernmental Activities in Antarctica

State of Hawaii environmental impact statement rules

# Global Coral Reef Alliance

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**May 5, 2021**

## **REVIEW OF DISNEY CRUISE LINES ISLAND DEVELOPMENT EIA FOR LIGHTHOUSE POINT, ELEUTHERA, BAHAMAS**

**To: The Bahamas Department of Environmental Planning and  
Protection**

**Via: reEarth**

**Thomas J. F. Goreau, PhD  
President, Global Coral Reef Alliance**

**Bahamian coral reefs have never been in worse condition since the first good underwater photos were taken in the Bahamas in 1948 by my grandfather and father.**



**First underwater closeup photograph, F. W. Goreau, Bahamas, 1948**

**Lighthouse Point's coral reefs have many unique features, not discussed in the EIA, that require the highest possible protection from land-based sources of pollution, such as those that would be**

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**created by proposed activities at the site.**



Oblique Aerial – View Looking North



Oblique Aerial – View Looking Northwest

*Oblique Aerial Photographs  
Lighthouse Point*

**Lighthouse Point has some of the least damaged coral reefs in the Bahamas and pristine salt ponds of global importance as migratory bird habitat (from EIA).**

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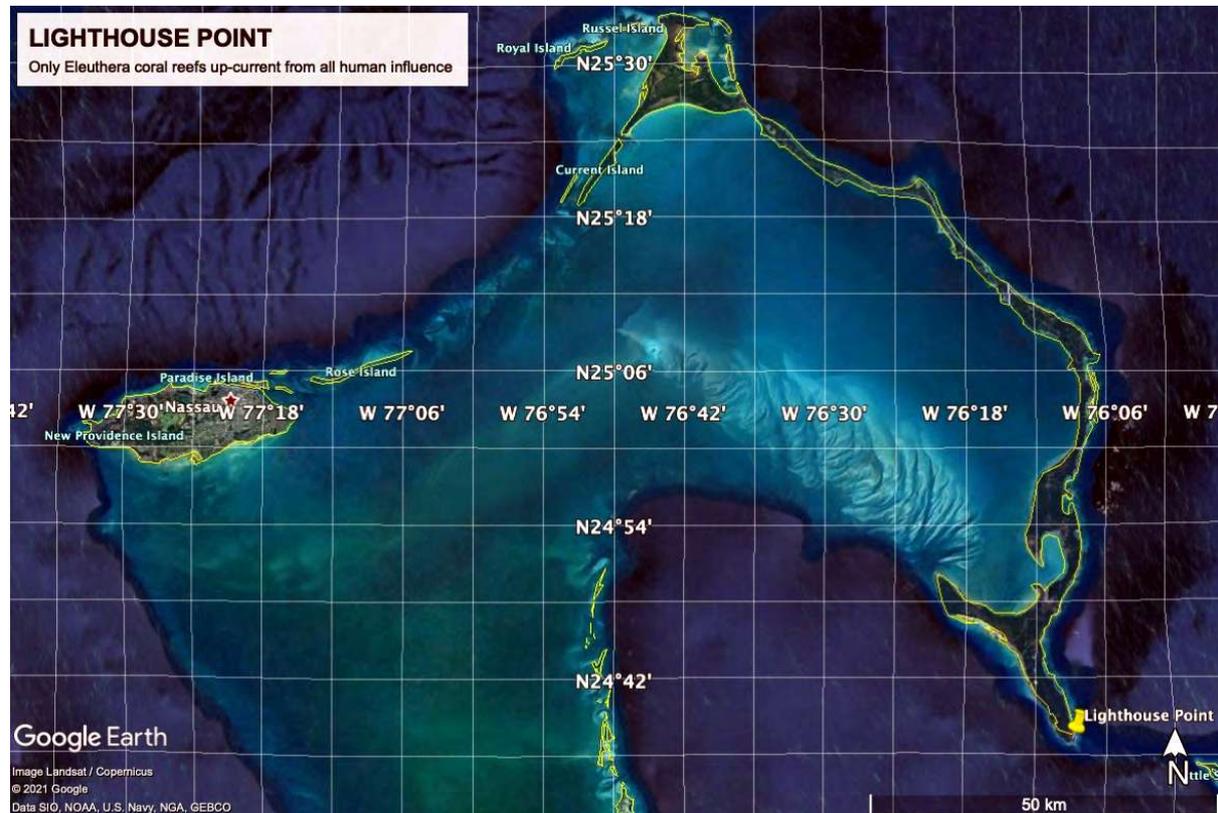
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Due to their location at the extreme southern end of Eleuthera, sticking out into clean ocean waters thousands of meters deep, these are the only coral reefs in Eleuthera that are entirely up-current from sources of land-based pollution, and therefore of the highest national conservation importance.



Lighthouse Point sticks out into clean deep Atlantic water, and is up-current from all human influence because currents and waves approach mainly from the southeast.

The EIA describes the health of Lighthouse Point coral reefs as “fair”, because live coral cover was about 1-10%, but the survey omitted all the areas of highest coral cover in deeper water on the east side of Lighthouse Point. Because of their exceptional water quality and lack of human disturbance, these reefs are likely among the most pristine reefs left in the Bahamas. Coral reef organisms may go to record depths there because of the clear water.

Lighthouse Point is certainly the major grouper spawning site in Eleuthera because it has all the features groupers look for: a promontory sticking out into deep water, exposed to waves, with currents flowing up both sides, allowing baby groupers to spread

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up both coasts. Whales and dolphins also pass by the Point. It is therefore of critical fisheries importance, although not identified as such in the national environmental protection plan. Lighthouse Point was designated for Protected Area status in the national Environmental Marine Protection Plan, but this recommendation has not been established or enforced.



Lighthouse Point was designated a Proposed Marine Protected Area in the 2018 Bahamas Environmental Marine Protection Plan, for establishment by 2020. It has not yet been established or enforced.

Because Lighthouse Point sticks out into the wind and waves, it is strongly exposed on both sides to hurricane waves there is only a narrow sand beach. Shore and offshore areas have hard limestone bottom with a thin shifting sand layer. During hurricanes some sand is thrown up on land, forming dunes, but most is washed out to deep water and lost. For this reason, there is not enough beach

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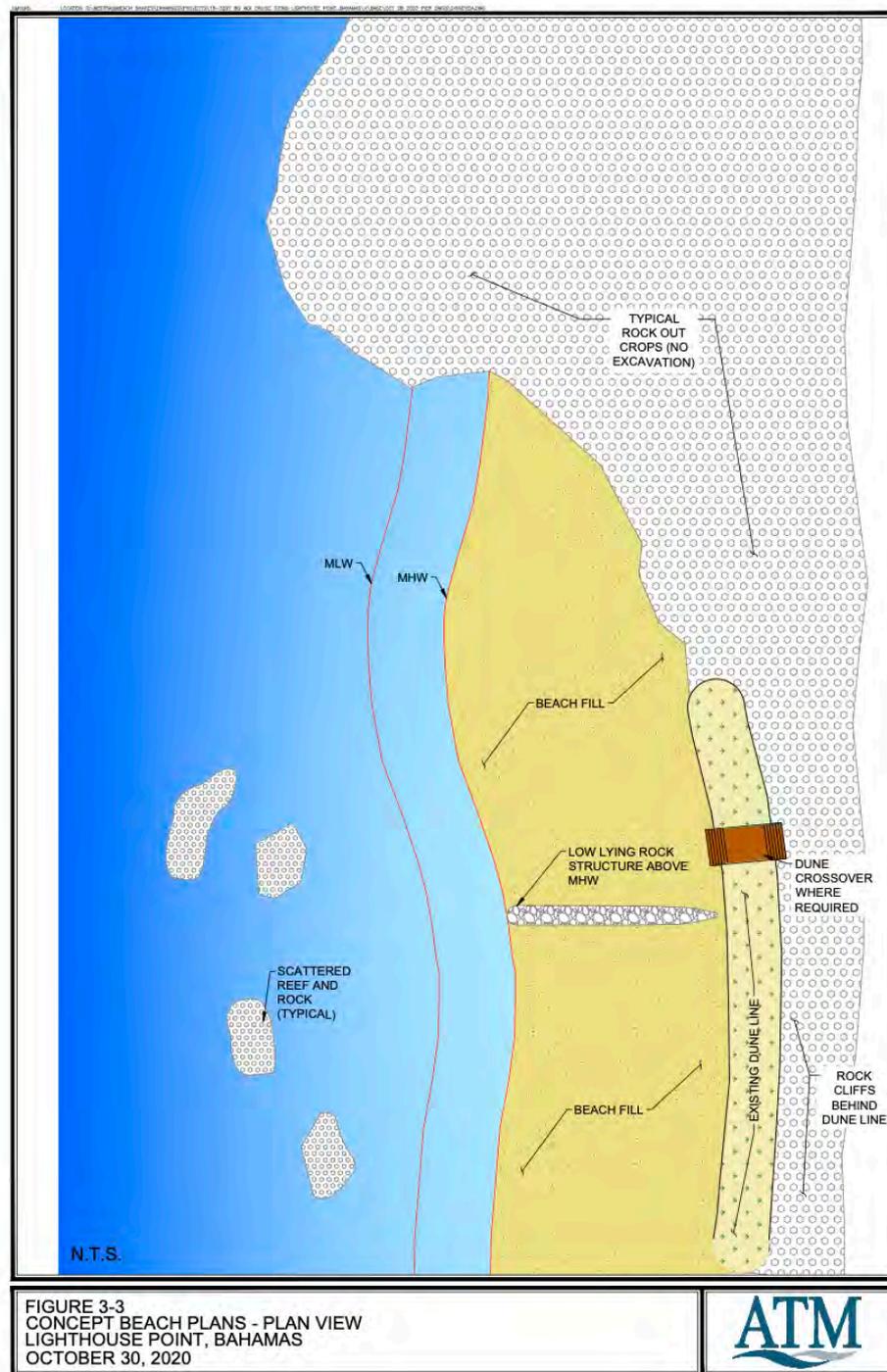
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**sand there to accommodate the number of tourists planned by the developers!**

**Their solution is to import sand and dump it above the high tide mark to create artificial beaches on both sides of Lighthouse Point. There is not enough sand locally to dredge or pump to the site. They do not say where this sand will be brought from, nor whether it will be transported by barge or truck, and then spread by bulldozers.**

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**Schematic plan for dumping sand above the high tide mark to create artificial beaches on both sides of Lighthouse Point, with stone structures on either side to keep them in place. Overhead view. Note living coral reefs right in front of the artificial beach. From the EIA.**

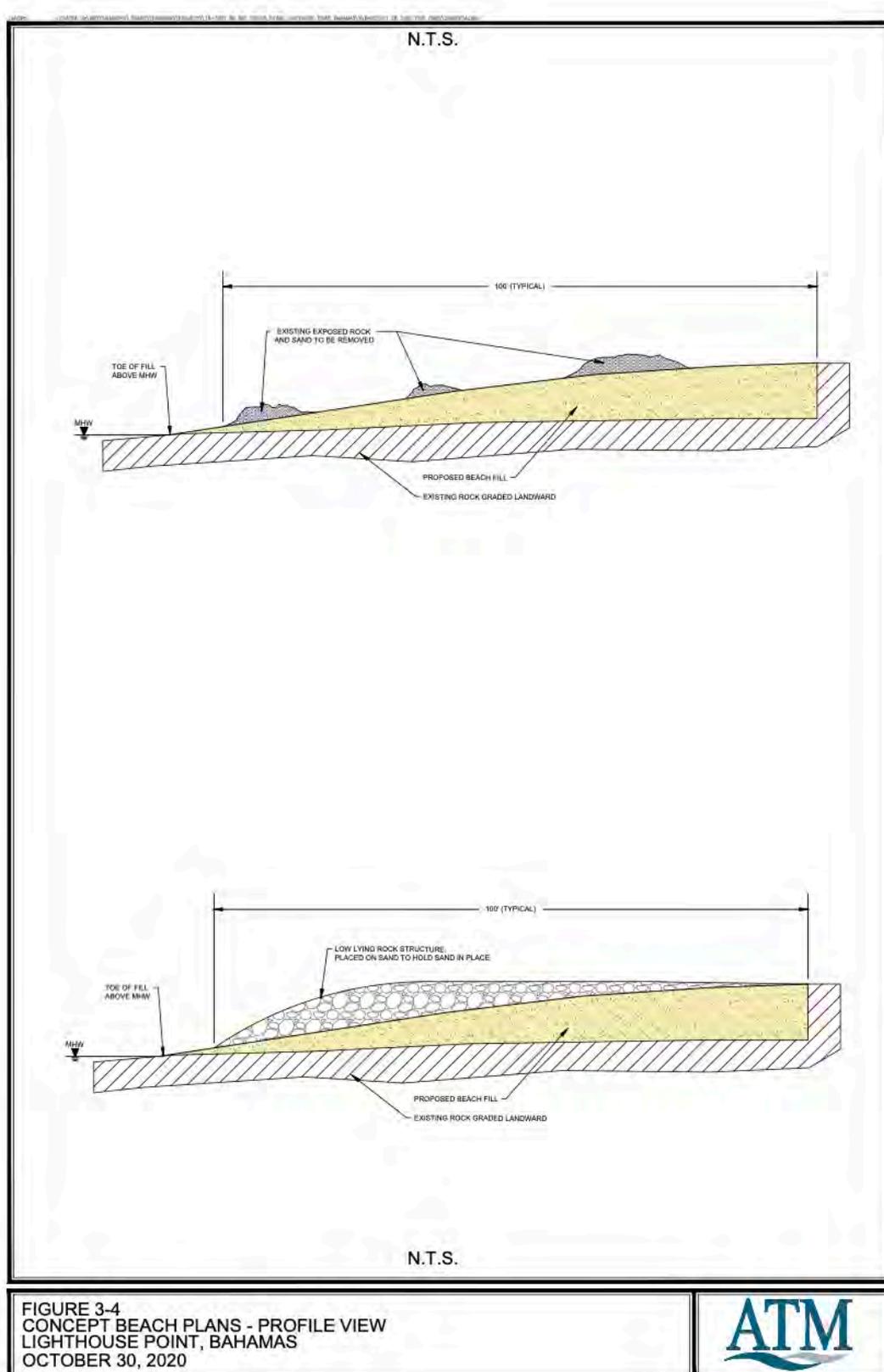
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**Plan for dumping sand above the high tide mark to create artificial beaches on both sides of Lighthouse Point, with stone structures on either side to keep them in place. Side view. Coral reefs in front**

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of beach are not shown. From the EIA.

A unique feature of Lighthouse Point is the fact that all three of the severely endangered Acropora elkhorn and staghorn coral species are found together in very shallow nearshore waters, right in front of the proposed artificial beaches.



Location of shallow elkhorn and staghorn reef in front of proposed

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artificial beaches (+ symbols). From EIA, with red circles added to show how close they are to sand dumping for artificial beaches.

Elkhorn and staghorn corals used to be the most common corals in all clean shallow Bahamian coral reefs, but have almost vanished, and are very rarely now found together anywhere. These species provide the best shoreline protection from waves and the best fish habitat because they are the fastest growing Caribbean corals. These corals require the cleanest waters and good water movement by waves to survive, and are the first to disappear where waters become muddy from dredging and soil erosion, or polluted with nutrients. These species are especially vulnerable to sand from dredging. Once water quality deterioration kills these species, fisheries collapse and beaches wash away, a process far advanced in the developed islands of the Bahamas and Caribbean. In addition, they are especially vulnerable to coral diseases, and were the first species to be largely killed off by diseases throughout the entire Caribbean. Lighthouse Point is therefore of exceptionally high quality for the most endangered Bahamian reef building coral species, and deserves the strongest protection from any activities that would cause turbidity or nutrient inputs in coastal waters.

Three planned activities are described in the EIA that would greatly damage water quality at this site: 1) nutrient discharge to coastal waters from sewage, 2) turbidity caused by boat docking, and 3) erosion of landfill beaches onto the reef.

1) A proposed waste water treatment plant is described, but almost no details are given. It is not clear if sewage will be treated to tertiary level to remove the nutrients, which if discharged into groundwater or surface waters will cause harmful algae blooms that will overgrow and kill corals and sea grasses, and choke migratory bird habitat with slimy weeds. The description of algae found on the reef make it clear that high nutrient-indicating fleshy algae are absent from the reefs, and the algae present are mostly coralline algae that produce white beach sand. Nutrient inputs will cause “bad” algae that produce no sand to overgrow and kill “good” sand producing algae. This stops new supplies of sand to make up for that which is lost to storms, while weedy algae

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overgrowth smothers the corals that protect the beach from wave erosion, increasing erosion. The EIA suggests that sewage plant effluent waste water will be recycled to irrigate lawns and ornamental plants, but it is impossible to prevent this soaking into the sea and damaging near shore reefs and sea grasses. No geotextile layer to prevent discharge into the sea is mentioned in the Lighthouse Point EIA, and they were found not to work in a major project at Bakers Bay, Abaco, whose developers claimed that all waste water would be recycled by irrigating golf courses that were sealed off below with geotextile to prevent leakage to the aquifer and ocean. Despite these claims, in fact nutrients leaked into the sea at Bakers Bay and caused harmful algae blooms and diseases that killed most of the corals on nearby coral reefs (<https://www.globalcoral.org/golf-courses-kill-coral-reefs-and-fisheries-harmful-algae-blooms-and-disease-caused-by-nutrient-runoff-from-golf-course-development-on-guana-cay-abaco-bahamas/>). I have personally seen reefs all around the Caribbean killed this way for more than 60 years, including New Providence, Grand Bahama, and Abaco, and appeal to Bahamians not to let this happen to one of their Crown Jewel National Marine Treasures, the coral reefs at Lighthouse Point, Eleuthera.



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**Coral reefs killed by golf course fertilizers and sewage at Bakers Bay, Abaco. The same is true in New Providence and Grand Bahama.**

**2) Disney Cruises use an innovative design that causes no dredging for cruise ship pier installation, because dredging has caused terrible damage to reefs at cruise ship destinations all across the Caribbean. However, the strong directional jets created during ship movements while docking and leaving port stir up sediment and leave clouds of fine-grained sediment to drift over coral reefs down-current. I advised the Turks and Caicos Island Government Department of Environment and Coastal Resources (DECR) national coral reef health assessment. We found corals on reefs kilometers down-current from the cruise ship pier on Grand Turk being killed by sediments suspended by propeller wash from cruise ships docking and leaving. Before the pier went in, that reef was the last good shallow snorkeling coral reef we could find in TCI with corals in healthy condition. DECR was forced to rescue and transplant thousands of corals that were being killed by sedimentation caused by cruise ships, and move them onto artificial reefs in clear water up-current from the pier. I have seen the same effects in Cozumel and other cruise ports around the Caribbean. Bahamian corals have had large scale mortality from repeated high temperature bleaching events, and are on the edge of survival from global warming. Warm water, heated by the engines from the directional jets on the cruise liners, will add additional stress to corals down-current. These engines must be on all the time while the cruise ship is at dock in case the wind suddenly shifts, as long familiar to Bahamian sailors! The EIA says thermal impacts will be small if there are good currents, but they could make the difference between life and death for corals under calm conditions. Impacts will be inevitable to reefs down-current from the dock to the north west of Lighthouse Point despite EIA claims there will be no effect.**

**3) A major threat to the offshore reefs is being buried when the artificial beach created by sand dumping on the shore is washed into the sea by storm waves. Global sea level rise and increasing storm strength caused by global warming make this inevitable. These beaches are naturally narrow because of strong windward**

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# Global Coral Reef Alliance

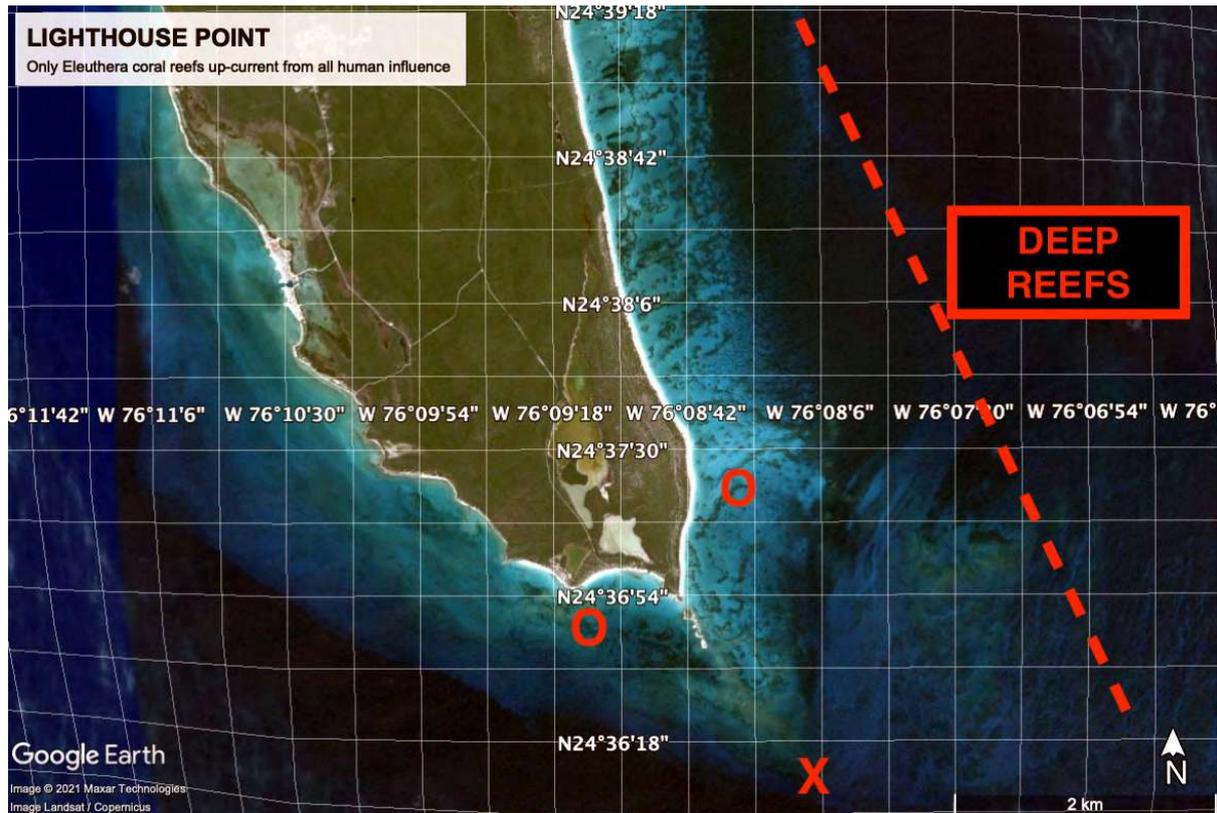
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A non-profit organization for protection and sustainable management of coral reefs

exposure orientated into the waves, the narrow shelf, hard flat limestone bottom, and fact that most of corals are in deep water at the edge of the drop off. A large amount of sand is produced by coralline algae, but most is washed away into deep water, so the area is generally starved of sand, with only a very thin veneer of mobile sand over hard limestone rock. Sand placed above the high tide mark will be unstable in the long run. Some will be washed onto the sand dunes by storm waves and wind, but eventually most will be washed into the sea and lost over the edge of the drop off into deep water. Corals between the shore and the reef edge will be buried and killed by eroded beach sand. Erosion of beach dredge-fill sand dumped on South Florida beaches (called “beach renourishment”), killed all the inshore coral reefs that once lined the coast of Southeast Florida. If the goal is to keep the emplaced sand on the beach for cruise ship passengers, they will need to grow coral reefs to protect them from erosion, or make artificial ones. In South Florida all of the coral reefs that used to lie offshore and provided and protected the sand that built the natural beaches were smothered and killed when beaches were widened by sand dumping. Sand was washed offshore by the first storms. Since Florida lost both sand source and protection, they ever since have needed to dump more and more sand. The sand dumped never lasts out the year, and much is lost to deep water! Now no more dredge-able sand remains in South Florida, and they want to import it from the Bahamas. The same will happen at Lighthouse Point, where the artificial beach could be wiped out in the first hurricane or Norther, and kill all the shallow elkhorn and staghorn reefs in front of them, as happened to Florida in the 1970s.

# Global Coral Reef Alliance

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Shallow reefs (circles), grouper spawning sites (X), and deep reefs with high coral cover and diversity (dashed line) will be affected.

Quite apart from the fact that the artificial beaches will damage the coral reefs when they are washed away, every cruise ship that enters or leaves the pier will send a cloud of suspended sediment over the corals down-current. The best remaining snorkeling reefs in the Turks and Caicos Islands were smothered kilometers down-current by dredging and cruise ship sediment plumes. This will also happen at Lighthouse Point.

# Global Coral Reef Alliance

A non-profit organization for protection and sustainable management of coral reefs



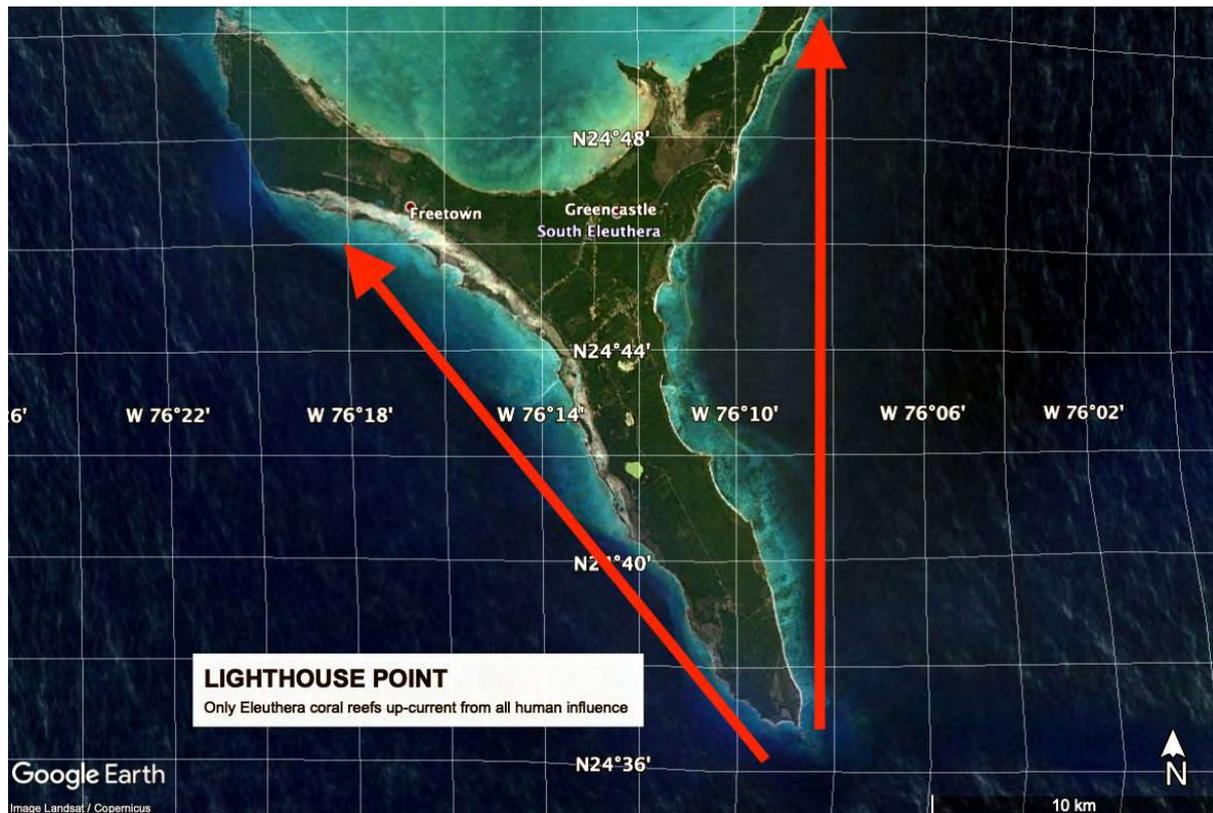
Grand Turk cruise ship pier. Coral reefs kilometers down current were smothered by sedimentation. Every cruise ship that enters and leaves sends a plume of mud onto the reef. The same will happen at Lighthouse Point, but the area affected will be larger than Grand Turk because the site is more exposed to longshore wave driven currents.

I congratulate authors of this EIA for the exceptionally complete job they made describing the site and the species found there, despite incomplete studies due to Covid. Their thorough descriptions allowed offshore ecological conditions of the site to be determined, even though missing from the analysis in the EIA itself, and even though they avoided looking at the best coral reef areas. For example, the EIA says that no reef fish spawning aggregation sites exist in the area that could be impacted, and that the nearest one documented is around 30 miles away, but this is probably because no detailed studies have been made there. Lighthouse Point is certainly a major breeding aggregation site for groupers and other fish, because what they look for is a submarine headland pointing out into deep water, and Lighthouse Point is probably the top grouper spawning site in Eleuthera for both coasts of the island.

# Global Coral Reef Alliance

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In conclusion this proposed development risks severe ecological damage to unique Bahamian coral reefs and fisheries of national conservation importance through sewage causing harmful algae blooms, turbidity caused by cruise ships, and erosion of artificial beach sand unprotected from storm waves. Both sides of Eleuthera will be affected if Eleuthera's best reefs are damaged by this environmentally irresponsible proposal.



Impacts of this project will damage both sides of Eleuthera.

Please note I have received no money for review and comment on the 551 page EIA. My comments are motivated by what is best for Bahamian coral reefs and fisheries and not by any financial benefit such as received by the highly paid teams that produced this EIA.

Comments submitted by: Dr. Ancilleno Davis, PhD, Owner/Founder of Science and Perspective

*\*Dr. Davis has been working and collecting scientific data in The Bahamas for 20 years.*

Seeing Sustainability at Lighthouse Point  
Disney Cruise Lines Lighthouse Point EIA review

Background

Disney Cruise Lines have proposed a development at lighthouse Point in Eleuthera, The Bahamas. The proposed development has evolved significantly over the past few years and seen a major reduction in the acreage to be developed and the amount of natural habitat to be impacted. This development is expected to bring many more guests to the island of Eleuthera than ever before, however, those guests will be prevented from interacting with the people and economies of Eleuthera by significant social, physical, technological and economic boundaries. Each of these barriers will be discussed in this review.

The Lighthouse Point development will impact the environment in and near the development during the construction and set up phases through immediate catastrophic effects such as habitat removal, dredging and species introduction. Long term and cumulative effects on the site will also result from repeated and persistent introductions to the site such as human waste and food waste, insecticides and insect repellents and sunblock.

There are gaps in the methodology used in the implementation of the Disney EIA and several of these gaps should be resolved before implementation of the project.

The site has been purchased by Disney already. The Project site includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas (2.1). The project site is 919 acres and includes 758 acres purchased by Disney

Area	Sub set		
Crown Lands	Big Pond		
	White Pond		
	Other Land Parcels		
Subtotal			161
Disney Purchased property	Donated Public Lands	193	
	Undisturbed	413	

	Development	152	
subtotal			758
Total Project			919?

The site is intended to serve Disney Cruise Lines Company which operates four ships registered in the Bahamas. Those ships are Disney Dream (4,000 pax), Disney Fantasy (4,000 pax), Disney Magic (2,700 pax), Disney Wonder (2,700 pax). The passengers include 1458 crew for Disney Dream and Fantasy and 945 crew for Disney Magic and Wonder.

### Social

The Cultural landscape of the Bahamas and Eleuthera is vulnerable to disturbance and the people are subject to victimization as are people throughout the Caribbean.

Specific attention must be paid to the effect on local communities and economies, and the representation of local people.

Restricted Access: Most of the debate surrounding Lighthouse point regards restricted access to the location for Bahamians, residents and non-Disney visitors. The EIA highlights positive benefits including job generation and pay scales for bahamians.

1. Clarity is needed on what types of jobs will be available to Bahamians. Will there be positions at multiple levels of the organization for Bahamians or will Bahamians be restricted to lower levels of the organization/menial labor positions such as cleaning, cooking, security or landscaping?
2. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment and represent income for immigration and potentially competition for local service providers, tour guides etc. Weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.
3. How much time to conversion of all on island staff to Bahamians?
4. When the cruise ship is not in, there are only 2 people at Princess Cay. what about the other staff/employees? When in port how much of the on island work will be conducted by ship staff that come and work?

### Economic

The Economic history and current climate of the Bahamas make the island of Eleuthera and the Bahamas on the whole vulnerable to exploitation from developers who have the money to encourage the country to accept unsustainable or unbalanced business offerings.

1. Will these jobs be salaried monthly pay positions that are climate proof in the event of storms, or are they hourly wage jobs which will leave the employees vulnerable when storms or other events stop ship sailings?
2. Non-commercial access to the site means no Bahamian can engage in financial gain on the site unless employed by Disney. Does this include all the donated lands?
3. Can crown land in the area be sold and or restricted as such to a non bahamian entity?
4. Does non-commercial access also mean that Disney will not have any forced costs for participation (security, parking, food vending, admission) for Bahamians and our guests?
5. At Princess cays there is a notorious fence that locals are not allowed to cross when the cruise ships are not present and then, only those Bahamians with a special permit can cross into the property. Will Disney institute similar infrastructure?
6. When ships are out of port, will staff be earning money?
7. How do the weekly wages relate to guests per employee ratios?
8. How does this compare to local restaurants, hotels or other cruise ships?

20,000 guests per week for 52 weeks per year = 1,040,000 guests a year.  
 800,000,000 dollars over 25 years = approximately 32,000,000 yearly  
 less than 32 dollars per guest for Disney lighthouse point guest.

if the employees get 600 per week and there are 150 of them in construction and operational phases, that comes to 90,000 per week or 4,680,000 per year. so in wages, Bahamians get \$4.50 per guest on their island.

## Environmental

The natural environment of the area is sensitive to disturbance and has a history of exploitation for economic gain. Resident and migrant bird species, fish, coral and other marine species use the area and are documented in various scientific and anecdotal reports.

The site has been purchased by Disney already. It includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas.

1. The EIA disregards the cumulative impacts of adding the Disney cruise ships to the Carnival and Princess Cruise lines visitors that already use the area. These cumulative impacts will be much more severe than Disney describes and there is no carrying capacity of the environment discussed. Combined with the lack of waste management and waste export protocols, burning on the island and deep injection disposal of waste will affect the environment.
2. No Brazilian Pepper was mentioned in the area.

3. The Protected trees order is much larger now and the botanical survey should be updated to reflect that and the species there.
4. Though not specifically protected, endemic species have restricted distribution in the Bahamas and the region. There are other species as well that are of local and regional importance but are not necessarily listed in international treaties or local law. Our native and endemic species are more locally important for sustainable place based tourism. The surveys took place outside of their breeding season and were therefore biased toward winter migrant species.
5. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment. They also represent income for immigration and potentially competition for local service providers, tour guides etc. weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.

#### Mischaracterization of Habitat

A Key element of the EIA is the characterization/classification of the habitat. In particular, Marine habitat includes areas characterized as “barren sands” in the Disney EIA. I have never seen barren sands in the Bahamas and open sandy areas include species such as flounder, bonefish, sharks, skates, rays. Sandy areas also serve as foraging sites for species such as dolphins who capture fish like rosy razorfish and eels. The sporadic nature and short duration of the surveys combined with the survey bias misrepresent the value and sensitivity of marine habitats. Biases are introduced when sandy areas are disregarded as barren or when surveys focus on coral based methodologies such as AGRRA.

Discussions of Marine environment issues (4-89) included The Cape Eleuthera Institute, the Perry Institute for Marine Sciences and the Bahamas National Trust. These organizations all have considerable experience and investment in our marine resources. Additional consultations with the Bahamas Reef Environment Educational Foundation and the Bahamas Fisheries Association may have generated different results or improved the understanding of the resource.

1. The EIA states that bonefish do not use the area based on personal Communication with one fisherman, and reference research that describes nurse shark mating areas and grouper spawning aggregations as being outside of the area of impact. Research bias limits the research of other groups to the area within their reach.

## **Morris, Meghann E.**

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**From:** DCL Bahamas  
**Sent:** Friday, July 16, 2021 4:49 PM  
**To:** 'lastchanceforlighthousepoint@gmail.com'  
**Subject:** Lighthouse Point Environmental Impact Assessment  
**Attachments:** LC4LHP LHP EIA Final Comments.pdf; LC4LHP\_Response.pdf

Thank you for your feedback. Your report and our comprehensive response will be shared with The Bahamas Department of Environmental Planning and Protection and included in our Public Consultation Report.

We have spent three years working hand-in-hand with a team of highly qualified and experienced scientists, ecologists, professional engineers and construction experts, among others, on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company's deep and longstanding commitment to the environment. The EIA has confirmed this will be possible – and there will be no loss of marine or terrestrial biodiversity at a species level - with the appropriate environmental management plan in place.

We follow and have the utmost respect for the laws and regulations of the locations where we do business. As you are aware, the environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan (EMP), the second phase of this process, will be as well.

We have reviewed your report in detail. While many of the concerns raised are broad-based opinions that are inconsistent with the facts we spent three years acquiring and studying, we have addressed each comment. Additionally, several of the matters raised are outside of the scope of the EIA; however, we have addressed them as fully as possible. Responses are detailed in a table format to ensure every statement has been addressed. Many comments in the report were repeated several times and as such, our responses are also repeated throughout.

Over the past few years, we have responded to numerous letters from your organizations and we took relevant feedback into consideration as we developed our EIA. In addition, in February 2020, we met with Jacob Scherr, who indicated he was a senior advisor to your group to discuss our plans. As well, we shared a link to the EIA with you on the day it was posted on our website, March 10, 2021, and offered to discuss it further with you after you had time to review it. We did not receive a response to that offer. We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.

We continue to appreciate and respect your concern for the environment at Lighthouse Point and remain passionate about protecting this special place. We remain confident in our ability to move the project forward in a way that protects the environment, provides sustainable economic opportunities for the people of Eleuthera and beyond, celebrates Bahamian culture and helps further strengthen the community.

Sincerely,  
Disney Cruise Line

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Sincerely,  
Disney Cruise Line

**INTRODUCTION (pg 2)**

Question/Comment	Response
<p>The Stop Disney - Last Chance for Lighthouse Point Campaign — which consists of reEarth, BREEF, Save the Bays, Waterkeepers Bahamas, Waterkeeper Alliance, and Friends of the Earth U.S., and has attracted more than 445,000 supporters</p>	<p>We acknowledge the significant interest in the project, which was one of several reasons we took three years to ensure the development of a comprehensive EIA based on facts. We have spoken with thousands of people in Eleuthera, the greater Bahamas and beyond, as well as scientists and conservationists, over the past three years and the project has significant support among those who have taken the time to review the facts and provide feedback.</p>
<p>Disney says their team spent three years compiling the “most comprehensive Environmental Impact Assessments ever for a project in The Bahamas”. DEPP had it under review for one year. In contrast, the public was given just two months to review a 551-page document on a \$400 million project at a unique natural site surrounded by a proposed Marine Protected Area. Due to the truncated public review period, we did not have the time necessary to compile a complete list of necessary revisions to the EIA.</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.</p>
<p>“This document suggests a fundamental misunderstanding of the purpose of EIA. The purpose is not to document the impacts of a decision that has already been made and suggest a bit of mitigation. Rather, the highest purpose of EIA is to evaluate the environmental and related social and economic impacts of a proposed action and alternatives to inform decision making. As it stands, the document does not conform to international and U.S. standards for EIA.”</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.</p> <p>Alternative uses of this location were already evaluated by the Government of The Bahamas when Disney was seeking approval to acquire the land. Government approved the sale of the land to Disney after consultation with local people and stakeholders and in the knowledge that the current proposal was Disney’s intended use of the land. It is now up to the Ministry of the Environment to decide whether to accept the EIA. The EIA does not prejudice</p>

	<p>that decision but simply provides the facts to enable the DEPP and Minister of the Environment to make their determinations. Before acquiring Lighthouse Point, Disney explored alternative locations for this project. Several areas in The Bahamas were considered within the cruising range of the vessels that are anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.</p>
<p>Sadly many of the deficiencies in the EIA were avoidable. Our May 2, 2019 EIA Scoping Outline Letter and our July 23, 2020 EIA Supplement Scoping Letter to top Disney officials outlined key studies and analyses that needed to be included in a meaningful world-class EIA. Dr. Mark Penning, Vice President of Animals, Science, and Environment at the Walt Disney Company replied to our 2019 letter and stated that the issues we outlined were already within the scope of their EIA. However, the majority are not included in the current draft of the document.</p> <p>We have reiterated these concerns below. Disney never responded to our 2020 letter and, despite multiple offers, did not meet with our experts about the scope of the EIA.</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations.</p> <p>Over the past few years, we have responded to numerous letters from your organization. As Dr. Penning indicated in his response to you, many of the suggestions did not apply because DCL is not dredging a ship channel; however we did take relevant feedback into consideration as we developed our EIA. In addition, in February 2020, we met with a senior advisor to your group and reviewed our plans. As well, we shared a link to the EIA with you on the day it was posted on our website, March 10, 2021, and offered to discuss it further with you after you had time to review it. We did not receive a response to that offer. We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.</p>

**SUMMARY OF CONTENTS (pg 3)**

<b>Question/Comment</b>	<b>Response</b>
<p>The EIA relies on a still undisclosed economic study completed before COVID to make unsubstantiated claims about the economic benefits of the project for the people of Eleuthera and The Bahamas. There EIA needs to include data and analyses to show that this is a really “good deal” for all the stakeholders.</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report is published on the project website.</p> <p>Direct economic impacts were already reviewed by the Government of The Bahamas and are outlined in Disney’s Heads of Agreement, which can be</p>

	<p>found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products</li> </ul>
<p>The EIA does not address the social, economic, and environmental justice impacts of the proposed project</p>	<p>Social justice issues are not within the scope of the EIA. That said, the Walt Disney Company is committed to diversity and inclusion and, given the events of the past year in the U.S., we have further strengthened this commitment.</p> <p>For Lighthouse Point specifically, Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera.</p> <p>As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training, as well as small business grants across a variety of businesses.</p> <p>Additionally, the design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and</p>

	<p>Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artist from Eleuthera and Antonius Robert, a master artist from Nassau, are anchoring Disney’s efforts as we work with local artists, historians and creatives in The Bahamas.</p>
<p>The EIA ignores climate change impacts and climate risk. It does not contain the necessary studies to outline the project’s contributions to climate change. It also does not contain the necessary studies to address risks to the project from sea level rise, storm surges, and increased coastal flooding associated with climate change.</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>To provide further clarity, The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company’s business globally, including Disney Cruise Line.</p> <p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> </ul>

- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

The project will be zero waste to landfill. The goal is to minimize any waste that comes onto the site in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations, among others. The primary waste generated will be organic waste, which will be treated with a biodigester. Modular construction techniques will also be used.

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency's (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500- year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.

	<p>All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>
<p>The EIA does not address the threat of Covid-19 or future pandemics. This is essential, especially considering the limited infrastructure and lack of a hospital on Eleuthera.</p>	<p>While pandemic-related issues are not within the scope of the EIA, Disney Cruise Line has among the highest public health inspection scores and has developed a multi-layered approach to dealing with COVID-19 and other illnesses onboard. Since our cruises to The Bahamas generally originate from the U.S., the ships must adhere to stringent U.S. Centers for Disease Control and Prevention guidelines. Our ships are equipped with doctors and nurses, as well as medical facilities that include isolation rooms, monitoring care, ventilators, oxygen, laboratory and pharmacy services. The ship’s medical staff adheres to the requirements of the American College of Emergency Physician Health Care Guidelines for Cruise Ship Medical Facilities. Additional human health and safety issues, including pandemic-related issues, will be addressed as part of the Environmental Management Plan.</p>
<p>The EIA does not mention that the waters surrounding Lighthouse Point have been officially proposed as a Marine Protected Area (MPA) as part of the Caribbean Challenge Initiative efforts to protect 20% of Bahamian marine resources by 2020.</p>	<p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs (20 x 20 White Paper Marine Protection Plan, 2018) points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p>

	<p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
<p>The EIA does not meaningfully consider alternatives, which is an explicit requirement in the Bahamian 2020 EIA Regulations. Disney continues to suggest that the only alternative was a much denser condo-marina project that was proposed for Lighthouse Point more than a decade ago. Disney does not mention that the project was opposed and failed. It does not consider the land-based sustainable alternative proposed by local groups.</p>	<p>Alternative uses of this location were already evaluated by the Government of The Bahamas when Disney was seeking approval to acquire the land. Government approved the sale of the land to Disney after consultation with local people and stakeholders and in the knowledge that the current proposal was Disney’s intended use of the land. It is now up to the Ministry of the Environment to decide whether to accept the EIA. The EIA does not prejudge that decision but simply provides the facts to enable the DEPP and Minister of the Environment to make their determinations.</p> <p>That said, the EIA does reference site alternatives and details may be found in the EIA Section 2.4 – SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.</p> <p>As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected, several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of</p>

	<p>dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.</p>
<p>The EIA addresses the environmental impacts of the construction phase of the project, but provides little to no analysis of the long-term impacts of operation and up to 1 million visitors a year.</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day (approximately 1,600 to 2,900 per day). Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.</p>
<p>The EIA focuses primarily on terrestrial ecosystems, but is much less comprehensive on the impact of the project on</p>	<p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with</p>

marine environments. It includes minimal surveys of the presence of marine species, but no analysis of impacts on:

- migration patterns of bonefish, groupers, and snappers – all commercially-important species.
- Marine mammals, whales, and dolphins.

representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting fall 2021.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019),

thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to

bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, work continues as part of our efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

Construction noise impacts are addressed in the EIA Section 6.2.1.6 – CONSTRUCTION NOISE IMPACTS and EIA Section 6.2.1.8.1 – NOISE LEVEL AVOIDANCE DURING CONSTRUCTION. The noise level

	<p>associated with pile driving varies significantly depending on the equipment utilized, the overall size of the piles, the substrate into which the piles are driven, the force applied, and the distance to the source but we recognize construction noise has the potential to impact marine mammals in the area. To address this during construction we will work with SMRU Consulting, the world’s leading marine mammal consultancy trained to assess and mitigate any potential impacts to marine mammals due to development, to determine impact zones, soft start construction strategies, and employ visual observation that will be in place to ensure construction noise is halted when marine mammals are in the area. Regarding marine noise once operational, as previously shared, Disney Cruise Line vessels will utilize shipping lanes already used by other commercial ships and use by Disney ships is not expected to significantly impact this area in the context with other ship traffic. During operation we will work with consultants to train vendors and staff on proper strategies to help protect marine mammals and a monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p>
<p>The mitigation measures outlined in the EIA are vague at best.</p>	<p>Section 7 of the EIA provides extensive information about proposed mitigation measures. More detailed information will be outlined in the Environmental Management Plan, which is the second phase of this process as required by Bahamian laws and regulations.</p>
<p>Disney engaged in extensive outreach and community engagement on Eleuthera over the last two years (EIA 288-292). Yet Disney has refused repeatedly to engage with the Campaign’s Bahamian partner groups. They also have not consulted with our technical experts, many of whom are leaders in their fields and have extensive experience in The Bahamas and at Lighthouse Point.</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point. We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations working in The Bahamas. Examples, among others, include the Bahamas National Trust and the Perry Institute for Marine Science, both of which have extensive experience in this region. We also met with the Cape Eleuthera Institute/Island School multiple times and requested any information that could increase our understanding of the area.</p> <p>Over the past few years, we have responded to numerous letters from the organizations you referenced. We have taken relevant feedback into consideration as we developed our EIA. In February 2020, we met with a senior advisor to the group and reviewed our plans. As well, we shared a link to the EIA with the groups on the day it was posted on our website, March 10,</p>

	<p>2021, and offered to discuss it further with them after they had time to review it. We did not receive a response to that offer.</p> <p>We continue to welcome the opportunity to engage with any individual or organization willing to have conversations that are productive, reasonable and based on fact.</p>
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**CAMPAIGN COMMENTS – INADEQUATE DISCLOSURE AND DISCUSSION OF ECONOMICS (PG. 5)**

<p>The EIA provides such limited economic information that it is impossible to verify the accuracy of Disney’s claims that the port will provide economic benefits to the nearby communities, the island of Eleuthera, and The Bahamas. Thus, many Bahamians continue to question whether the cruise port is really a “good deal”. Disney has not released the 2018 Oxford Economics Study which supposedly substantiates their claims of economic benefits. To our knowledge, the only information that has been released is a very brief summary in the form of a powerpoint presentation which outlines takeaways, but does provide the underlying analyses (see Appendix). Disney needs to release the Oxford Economics Study so stakeholders can fully assess the validity of the economic benefits Disney has promised.</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report is published on the project website.</p> <p>Direct economic impacts are outlined in Disney’s Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products</li> </ul>
<p>Disney is investing up to \$400 million in the development at Lighthouse Point. Every bed aboard a Disney ship represents around \$237,000 in annual revenue. When multiplied by</p>	<p>It is unclear what the source is for the numbers that are being used for this analysis.</p>

3,500 passengers Disney can expect to take in revenues of \$830 million per ship, per year. The EIA states that the “project is conservatively expected to provide a \$805 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues” over a 25 year period. This amounts to an increase of only \$32.2 million in GDP and \$14.3 million increase in Bahamian Government revenues per year. Disney needs to make clear exactly how this deal is fair to The Bahamas and the people of South Eleuthera.

An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report is published on the project website.

Direct economic impacts are outlined in Disney’s Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document are the following items:

- Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.
- Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.
- Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement.
- Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.
- Providing priority to Bahamian-owned and -operated tour operators.
- Providing opportunities for Bahamian entertainers.
- Purchasing some Bahamian agricultural and seafood products

The EIA currently does not include information on expected increases in Gross National Income (GNI). The EIA only reports increases in Gross Domestic Product (GDP), which is essentially a useless measure. A significant, if not overwhelming, portion of this money could be going into the pockets of outsourced vendors from Florida or other nearby Disney associates, instead of into the pockets of Bahamians. As stated by Lawrence Pratt, a leading international expert in sustainable tourism economics, in his analysis of Disney’s EIA, “GDP counts both costs and benefits as benefits (e.g. sales to tourists and disposing of tourists’ waste), effectively ‘double counting’ the impact of development if further

The full economic impact study is published in the Public Consultation Report on the project website. It clearly outlines data sources and methods used. Oxford Economics used a proprietary input-output model to complete the economic impact modeling. The model is based on industry output, value added, income, and employment data generated by The Bahamas Department of Statistics and the Bahamas Ministry of Finance.

Gross National Income is another measure of the broad economy and can make a difference for some countries. However, the differences are generally minor in The Bahamas.

<p>information is not provided. It is standard practice to detail direct, indirect and induced effects as well as estimated effects on tax revenues and value added in input-output analyses to shed additional light on the likely size of local net benefits and costs.” He continued, “GDP is a measure of gross billing by the proponent, which is an accounting measure that has little relationship to Bahamian national accounts or in no way reflects the actual income effects in the country” (see Appendix).</p>	
<p>Further, the EIA also provides no explanation as to how the reported GDP increase estimate was calculated. In fact, historic levels of onshore spending are considerably lower. As stated by L. Pratt (see Appendix) “To arrive at this gross sales number, the proponent is either:</p> <ul style="list-style-type: none"> <li>• including all of its receipts from sales to guests, not just the portion that is territorial to The Bahamas</li> <li>• using a level of guest spending much higher than observed in studies and reported by the industry</li> <li>• considering a far greater guest level than that reported in the EIA itself</li> <li>• claiming generous multiplier effects without explaining how this multiplier was estimated.</li> <li>• or some combination of one or more of the above points.”</li> </ul>	<p>The full economic impact study is published on the project website. It clearly outlines data sources and methods used. Oxford Economics used a proprietary input-output model to complete the economic impact modeling. The model is based on industry output, value added, income, and employment data generated by The Bahamas Department of Statistics and the Bahamas Ministry of Finance.</p>
<p>According to the Bahamian Minister of Tourism, Dionisio D’Aguilar, 75 percent of foreign visitors to the Bahamas are cruise passengers, but the cruise industry accounts for only 11 percent of overall tourist spending. Traditional heads-in-beds tourists spend 20 times more than cruise passengers, as has been publicly noted by the Minister of Tourism. Numerous economic studies substantiate the claim that stay-over tourism has far greater economic benefits than cruise tourism. The point at the LHP site is a very popular attraction for stay-over tourists visiting the island in Governor’s Harbor or even as far up as Harbour Island. These tourists frequently drive the length of the island to visit Lighthouse Point because of its pristine natural beauty. These tourists constitute a vital</p>	<p>This is not within the scope of the EIA.</p> <p>That said, the new public road will make it far easier for tourists to access the Lighthouse Point property. Additionally, Disney is donating significant beachfront acreage to the Government and people of The Bahamas in the northeast portion of the property and providing amenities such as parking and restrooms under the direction of Government, which will determine access to the donated land.</p> <p>Disney also will provide numerous opportunities for local businesses to participate in the Project, such as offering tours to cruise guests, selling their goods on-site or providing services to the operation, among others. These opportunities are outlined in the Heads of Agreement (HOA) located in</p>

<p>portion of the southern settlement’s income as they stop for gas, refreshments, souvenirs, etc. Disney’s EIA must consider studies to examine how development of the port will impact the likelihood of stay-over tourists, who are known to contribute more to the economy of The Bahamas, visiting the site and contributing to local businesses along the way. It must also outline project costs to local businesses.</p>	<p>Appendix I of the EIA. It is expected this will generate economic activity far over and beyond the activities that have been taking place on the site – which has been privately owned for decades – often without the permission of the landowner.</p>
<p>The EIA and the limited information we have received about the 2018 Oxford Economics study, do not address potential costs to local business. The EIA states that “the Developer will provide all citizens and residents of The Bahamas with full access to the property for non-commercial purposes.” This appears to exclude access to the area for independent local tour guides.</p> <p>Lighthouse Point is a major attraction for these businesses. At the April 8<sup>th</sup> DEPP public consultation at minute 01:10:40, the question of whether or not local bird and other environmental guides would be able to bring their own customers onto the site. Disney mentioned that they would hire Bahamians for their own shore excursions, but did not provide a clear answer as to whether or not local tour business would be able to operate independently at the site. As it stands, Disney has the liberty to determine the number of tour operators with which they will collaborate, if any, and there are currently no limits on the rate of commission that Disney can charge. The EIA must include more specific information about their intentions for interacting with local business. It also must provide analyses of how their own operations will impact independent local businesses.</p>	<p>Plans for engagement with local businesses is outside the scope of the EIA. This information is available in the signed Heads of Agreement (HOA) with The Bahamas, which can be found in Appendix I. Lighthouse Point is privately owned and has been for decades. The HOA states that, “The Developer will provide all citizens and residents of The Bahamas with full access to the Property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security.” The HOA also indicates that Disney Cruise Line will provide priority to Bahamian-owned and -operated tour operators, among other opportunities.</p> <p>It is DCL’s goal to maximize Bahamian participation in the project and these efforts are already well underway. Disney has held information sessions and met with hundreds of potential employees, vendors, tour operators and others to further build relationships and maximize opportunities for Eleuthera and the greater Bahamas and will continue to do so. Contracting for opportunities that will be available when the site is operational generally begins 12 to 18 months prior to the start of onsite operations.</p> <p>DCL also has worked with the Access Accelerator Small Business Development Centre and the Eleuthera Chamber of Commerce to create the Eleuthera Business Hub, providing more than \$1 million over three years to fund the facility, as well as business development advisory services, business communication training, customer service training, business mentorship and other programming , as well as grants, designed to prepare startups and small businesses for participation in development projects underway on Eleuthera, including Lighthouse Point.</p> <p>In general, we believe it is important to treat the businesses we work with respectfully. We work with each tour provider individually. The pricing we</p>

	<p>jointly establish for our guests reflects the operator’s costs and desired profit and also takes into account the role we play in the process, which includes all marketing and sales to our guests and addressing guest feedback. We also spend a great deal of time with tour operators to help them create and refine experiences that are appealing to our guests.</p>
<p>Furthermore, Disney announced a \$4 Billion dollar expansion with the addition of three new cruise ships. The Bahamas is critical to that objective. As it stands, Disney will pay no taxes on any kind of revenue, no real property taxes, and no import duties or tariffs for decades. Disney is at liberty to control the number of vendors allowed on site, as well as their location and merchandise. Disney has stated that they will hire as many as 150 Bahamians, but they have provided no guarantee. Taking all of these factors into account, Disney’s EIA as it stands does not provide a sufficient analysis of how this is a good deal for The Bahamas. The EIA must include additional studies that account for all of these factors, to show that The Bahamas will receive the economic benefits that Disney has promised.</p>	<p>Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study. The full economic impact study is published on the project website.</p> <p>Through its signed Heads of Agreement with the Government of The Bahamas, which can be found in Appendix I of the EIA, Disney has committed to creating economic opportunities for Bahamians, particularly in Eleuthera, and to strengthening the local community. HOA commitments, among others, include:</p> <p>Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</p> <ul style="list-style-type: none"> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> </ul>

	<ul style="list-style-type: none"> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
<p>Disney has said that their proposed port is compatible with a Marine Protected Area, but has yet to demonstrate how this is the case. According to the Economic Valuation of Ecosystem Services in Bahamian Marine Protected Areas conducted by BREEF, the Nature Conservancy, and the National Trust in 2017, the existing network of MPAs is worth \$6 billion per year in ecosystem services including crawfish habitat, shoreline protection, tourism and carbon storage. MPAs provide important sanctuaries to keep healthy populations of queen conch, grouper, spiny lobster, and other marine species that are commercially valuable. Fishing is the foundation of many Bahamians’ livelihoods, and the industry is already under stress due to overfishing. Impediments to fisheries conservation efforts could have rippling economic effects. The EIA must weigh the economic benefits of the cruise ship port against the benefits that the Lighthouse Point area would provide to The Bahamas as a Marine Protected Area.</p>	<p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p> <p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>

**CAMPAIGN COMMENTS – CONSIDERATION OF ALTERNATIVES (PG. 7)**

<p>The EIA does not adequately consider alternative plans, which is an explicit requirement in the final draft of the 2020 EIA Regulations. Disney mentions that other sites were considered, including Egg Island. However, the EIA does not at all consider alternative developments at the selected site, as is standard practice for EIAs across the world and in the U.S., Disney’s home country. Typically EIA’s will consider multiple different construction scenarios, including a no-development scenario.</p>	<p>Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.</p> <p>Alternative uses of this location were already evaluated by the Government of The Bahamas when Disney was seeking approval to acquire the land. Government approved the sale of the land to Disney after consultation with local people and stakeholders and in the knowledge that the current proposal was Disney’s intended use of the land.</p> <p>Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental</p>
<p>Disney continues to point to the higher impact marina project which was proposed more than ten years ago as the only other alternative, even though this plan was abandoned. Disney’s EIA ignores the land-based, lower-impact, sustainable alternative that has been proposed by local groups. They do</p>	

not at all consider the low development, ecotourism plan which was put forth by the One Eleuthera Foundation and other successful Bahmian hotel operators, and subsequently squashed by the Government. The EIA must consider the possibility of an even lower-scale, land-based, sustainable alternative.

Such an alternative concept was recently put forward by Chris Maxey, the founder of the Island School in Southern Eleuthera. Mr. Maxey recently wrote to Disney's CEO (See Appendix), Bob Chapek, asking him to consider cooperating with local organizations on a lower-impact, sustainable alternative that would better protect the environment and provide more jobs for Bahamians. Mr. Maxey did not receive a response. James Lima, an international expert on sustainable development who has worked closely with local groups on Eleuthera, said at the April 15 extended public consultation (see Appendix): "we found that a plan centered around educational and ecotourism, stay-over-tourism, at a very small footprint of the site would generate 27 times greater economic benefit for The Bahamas than the proposed Disney plan." Greg Miller, Executive Director, Center for Responsible Tourism, added in his comments: "Disney should be guided by global best destination selection and management practices, and reexamine alternative options including a more altered or degraded location, a land-based low impact option, and a no development option" (see Appendix). Ben Simmons, a resident of Eleuthera and local business owner, added: "I own two small hotels on Eleuthera and I am a strong believer that small, low-impact development is key to a sustainable economy that employs more people and is better prepared to deal with economic shocks. South Eleuthera already has a cruise port at Princess Cay and actually has the highest number of visitors on the island, but none of the economic benefits have gone to the people who actually live there. Who's to say this is going to

monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C – BASELINE MARINE SPECIES LIST.

The report that proposed a new Marine Protected Area in South Eleuthera points out that reefs near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point, we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that would result from the project and development. This includes the creation of at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, and ongoing training and professional development programs Disney has already committed to that are designed to build capacity and maximize opportunities for Bahamians.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 – SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project.

<p>be any different? Disney needs to do better than what they are currently proposing.”</p>	<p>Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.</p>
<p>Disney needs to conduct the analysis necessary to determine whether a lower-scale, alternative development option could better protect the environment and provide more jobs for South Eleutherans.</p>	<p>As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.</p> <p>In keeping with the environmental due diligence, DCL has continued to evolve the project’s design. For example, surveys identified a number of protected trees and some cultural ruins in the northwest area of the property. As a result, the structures originally planned for that area have been relocated to the eastern side of the property. Additionally, when bird surveys identified a small wintering population of endangered piping plovers at a location along the southern shore of the property, the design was adjusted to avoid that area. Likewise, it was determined that the pier could be narrowed, reducing the potential impact on the marine environment by approximately 25 percent.</p>

**CAMPAIGN COMMENTS – INADEQUATE CONSIDERATION OF CLIMATE RISKS AND IMPACTS (PG. 9)**

<p>The EIA claims that the “project is not expected to have a material impact on climate change”, but does not contain any studies or information to back up this assertion. Disney’s EIA for the Lighthouse Point project does not address climate risks – including storm surge and tidal flooding from</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been</p>
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<p>expected sea level rise (see the independent technical review of the EIA by the Woods Hole Group in the Appendix). The EIA does not consider the value of the proposed Marine Protected Area (MPA) off of the Point as a “natural climate solution”. Disney also has yet to publish information about the carbon emissions associated with the project.</p>	<p>part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>To provide further clarity, The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company’s business globally, including Disney Cruise Line.</p>
<p>The minimal mentions of climate change in the document redirect to Disney’s overall 2030 Sustainability Goals. The goals of The Walt Disney Company at large to reach net zero emissions (which may also be inadequate) do not disqualify the need for responsible development by their cruise line at Lighthouse Point. The long-term climate change implications of the project require much more thorough analysis.</p>	<p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p>
<p>Nearly one year after Hurricane Dorian and at the start of another hurricane season, it is more crucial than ever that Disney seriously consider the impact of increasing storm frequency and intensity, as well as other consequences of climate change. As Dr. Adelle Thomas, a Bahamian human-environment geographer, stated, <b>“we cannot continue with a business as usual approach that has resulted in the devastation seen by Dorian, Irma and Joaquin.”</b> Disney’s own 2009 Corporate Responsibility Report said that “current scientific conclusions indicate that urgent reductions in greenhouse gas emissions are required to avert accelerated climate change. Scarcity of natural resources and threats to ecosystems and biodiversity are serious environmental issues. <b>A successful response to these challenges demands fundamental changes in the way society, including businesses, use natural resources, and Disney is no exception.</b>” Still aware of the above-mentioned scarcity, Disney further recognized in 2019 that “strategic investments in natural climate solutions...protect natural resources and conserve habitats, as well as support local communities through economic development and employment.”</p>	<p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> <li>• Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution</li> <li>• Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity</li> <li>• Building envelopes designed to reduce energy loss</li> </ul>
<p>Disney should examine two main areas in its supplemental EIA with regard to climate change:</p>	<p>The project will be zero waste to landfill. The goal is to minimize any waste that comes onto the site in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations, among others. The</p>

7.) The long-term contributions of the project to climate change and its impacts. Disney has affirmed that the port is compatible with the company’s commitment to environmental stewardship and **“ensuring a world where wildlife thrives and nature is treasured and protected by: Saving wildlife. Inspiring action. Protecting the planet.”**

However, Disney has yet to disclose how this will be accomplished at Lighthouse Point. To properly address the environmental sustainability of the project, Disney must provide a thorough account of the cumulative impact of the port construction and operation. Disney must include in the EIA supplement a thorough assessment of the project’s contributions to climate change, especially considering the particular vulnerability of The Bahamas to its impacts. This must include accounts of all emissions associated with the port’s construction, operation, and decommissioning.

primary waste generated will be organic waste, which will be treated with a biodigester. Modular construction techniques will also be used.

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

The understanding of the materials, means and methods used to construct the site will evolve as the design progresses with the contracting method chosen to be Design-Build for the project. The Design-Build nature will allow for better control when looking at best practices to achieve a sustainable project footprint.

Emissions during construction will vary based on the work scopes being performed. The team will monitor the fleet to be certain that no vehicles or equipment are left running idle for any amount of time and only used when required. The same will apply to any power generation given the site constraints with no access to sustainable power.

The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency’s (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500- year return periods, plus long range SLR values and an appropriate

	<p>factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p> <p>All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>
<p>Cruise ships are well-known emitters of massive amounts of greenhouse gases. The emissions of one cruise ship in one day are equal to that of one million cars. Disney’s new ships will burn LNG, which contains primarily methane, a potent greenhouse gas (GHG) that traps 86 times more heat in the atmosphere than the same amount of CO2 over a 20-year time period. However, there is no mention in the EIA of the contributions of Disney’s cruise ships to climate change. The EIA must examine the long-term impacts of emissions from the cruise ships that will pass through the port.</p>	<p>The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company’s business globally, including Disney Cruise Line. And while we do not expect the proposed development at Lighthouse Point to have a material impact on climate change, we recognize the role greenhouse gas emissions play in climate change globally.</p> <p>As of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel. Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleetwide at all times.</p> <p>In addition, we are investigating a number of alternatives to reduce DCL’s reliance on fossil fuels. Right now, the marketplace simply doesn’t have the right technical solutions at the scale we need. We are committed to collaborating with industry groups and investing in research and development for low carbon fuel innovation.</p> <p>In the meantime and after careful consideration, we determined using LNG for our new ships is the best option currently available. LNG yields a more than 20% reduction in carbon emissions and an 85-100% reduction in other emissions (e.g., sulfur, particulate, nitrogen oxide). Our new ships have been designed and will be operated in a way that effectively reduces the chance of</p>

	<p>methane leaks. We will work with our suppliers to ensure extraction and transportation is as responsible as possible.</p> <p>Only one ship at a time is able to visit Lighthouse Point. As noted in the EIA (3.1.4.3 Boat and Vessel Traffic), the ship will operate some of its engine capacity to provide power for the ship’s needs. The combustion products are exhausted through the stack, typically located at highest point of the ship. The stack height may range from 150 feet to 190 feet or more. Considering the time the vessel is at berth in a 24-hour day, and exhaust discharge height and open-air conditions, it is reasonable to conclude that there will be no adverse effects on the local air quality due to ship activity while at berth. DCL’s internal policy is to keep visible emissions below 20 percent opacity while in port, except for initial startup and shut down of engines.</p> <p>DCL is consistently recognized as an industry leader from an environmental standpoint. All four DCL ships have the U.S. Coast Guard’s QUALSHIP 21 with Zero-E designation, which recognizes exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating a commitment to environmental stewardship. DCL also regularly wins awards such as the Blue Circle Award for voluntary efforts to conserve energy and reduce emissions from Port of Vancouver.</p>
<p>The proposed cruise port is an expansion of Disney’s operations in The Bahamas, and will result in more ships, more passengers, and more pollution in Bahamian waters and coasts. Disney must address how this increase in operation will add to climate change impacts that have significant consequences for The Bahamas. For example, ocean acidification and warming caused by our changing climate have devastated Bahamian coral reefs and other marine life that hold significant economic value as food and tourist attractions. The EIA must examine the potential for its port to exacerbate this, and other problems associated with climate change.</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>The report that proposes the Marine Protected Areas points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p>

	<p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
<p>Electricity at the port at Lighthouse Point will be produced onsite using solar power and generators with stored fuel. 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development. The EIA states that the feasibility of using a greater percentage of renewable energy is “being evaluated.” This evaluation should have been completed before the release of the EIA.</p>	<p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources. Project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> <li>• Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution</li> <li>• Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity</li> <li>• Building envelopes designed to reduce energy loss</li> </ul>
<p>Further, the EIA must examine whether the proposed project upholds or undermines the international commitments of the Government of The Bahamas (GoB). Most notably, the GoB enacted the National Policy for the Adaptation to Climate Change in 2005, committed to the Caribbean Challenge Initiative in 2013, and signed the Paris Agreement in 2015 in order to reduce emissions and protect the environment. The proposed project could damage the environment and aggravate climate change, meaning it also has the potential to compromise these commitments. Disney must provide a full account of how their proposed development and associated emissions will impact the ability of both the company and The Bahamas to meet these obligations. Further, Disney must</p>	<p>Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment. The project will utilize sustainable design, building, and management practices that will conserve natural resources, while allowing limited use of the land.</p>

<p>assess the impact of the proposed development on the company's own goals to reduce emissions beyond 2020.</p>	
<p>2.) The impacts of a changing climate and rising sea levels on the economics and long-term viability of the project.</p> <p>A 2018 study conducted by Climate Central scientists for the Inter-American Development Bank recognizes The Bahamas as the most vulnerable nation in the Caribbean to sea level rise. In The Bahamas, 32% of land and 25% of the population are located in the most high risk areas, falling below 0.5 meters above the high tide line. Moody's, a well-respected credit rating agency, identifies The Bahamas as among the top four countries forecast to be most affected economically by sea level rise, with damages from rising seas amounting to up to 15% of annual GDP.</p> <p>The anticipated physical and economic consequences of increasing storm frequency and intensity linked to climate change are also severe. Situated within warm Atlantic Ocean latitudes, The Bahamas is already particularly susceptible to hurricanes (Shultz et al, 2020). Recent projections published by the Caribbean Catastrophe Risk Insurance Facility suggest that with climate change and coastal agglomeration the costs of damages from extreme weather events could amount to losses of up to 9% of GDP annually by 2030 in the Caribbean (Bresch &amp; ECA working group, 2010).</p> <p>During a visit to The Bahamas after Dorian, UN Secretary-General António Guterres said, "it's impossible not to be horrified by the level of destruction caused by Hurricane Dorian in the Bahamas. In the era of the climate crisis, natural disasters have become more frequent and devastating. It's time to change course and implement strong climate action now."</p> <p>Coastal developments must fully consider the economics costs of damages associated with these issues. The impact of</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency's (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500-year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p> <p>All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite "Hurricane Shelter" is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>

these issues on the project must be fully analysed in the EIA to assure that the project at Lighthouse Point is economically viable over the long-term. Disney must conduct a thorough review of how these projected climate change impacts will affect the construction, operation, and economics of their proposed port, as well as the long-term viability of its infrastructure. To accomplish this, the EIA supplement must model sea level rise at Lighthouse Point. It must also assess and model intensifying hurricane conditions and their potential impacts on the proposed facilities and operations, taking into consideration potential hurricane-related damage to the surrounding natural environment.

**CAMPAIGN COMMENTS – IMPACTS FROM COVID-19/GLOBAL PANDEMIC (PG 12)**

Cruise ships were one of the most heavily impacted industries by the pandemic. Disney’s own cruise ships reported hundreds of cases of Covid-19 and one fatality. Cruise ships are also linked to the spread of Covid-19 and to higher rates of infection in port employees and host island residents. Cruise ship arrivals in countries like Mexico and Australia have been linked to much higher rates of infection, as there is high potential for the spread of disease between cruise ship passengers and port employees, as well as host nation residents. A new cruise port at Lighthouse Point could make The Bahamas even more vulnerable to the spread of infectious diseases like COVID-19.

While pandemic-related issues are not within the scope of the EIA, Disney Cruise Line has among the highest public health inspection scores in the industry and has developed a multi-layered approach to dealing with COVID-19 and other illnesses onboard. Since our cruises to The Bahamas generally originate from the U.S., the ships must adhere to stringent U.S. Centers for Disease Control guidelines. Additional human health and safety issues, including pandemic-related issues, will be addressed as part of the Environmental Management Plan.

As you know, Eleuthera is a largely-rural, lightly-populated island with no hospitals, minimal medical resources, and limited infrastructure. The implications of a future pandemic at a cruise port at Lighthouse Point would likely be severe. The protection of facility employees and local residents against disease from thousands of visitors a week coming ashore at Lighthouse Point is crucial. While there is significant pressure to rush ahead with new developments as the Bahamian economy attempts to recover from COVID-19,

<p>it is crucial that the port is developed, responsibly and sustainably in the face of global pandemics of this kind.</p>	
<p>Disney and the GoB must seriously consider the economic and public health dimensions of COVID-19 and other infectious diseases at Lighthouse Point. As such, the EIA must include a comprehensive analysis of 1.) the impacts of COVID-19 on Disney’s development, as well as the potential role of the Disney’s ships visiting Lighthouse Point in the spread of infectious disease 2.) the capacity of South Eleuthera and it’s infrastructure to handle a public health crisis that may result from infectious diseases brought there by the proposed cruise port operations.</p>	

**CAMPAIGN COMMENTS – OPERATIONAL IMPACTS (PG. 13)**

<p>The EIA primarily assesses the environmental impacts of the construction of the cruise port, detailing how noise and waste pollution, physical disturbances, and other consequences will affect the area during this phase. However, there is little to no mention of the environmental impacts of 1 million visitors a year and long-term operation of the port. Long-term operational impacts are likely to be the most severe with a project of this size.</p> <p>For example, there is no mention of the impacts of human foot traffic, sunscreen usage, energy generation, water consumption, water discharge, pesticide and other chemical usage, waste generation, and handling, etc. Potable water is to be obtained through desalination (reverse osmosis). This is a very energy intensive process, produces toxic wastewater and will likely have notable impacts. The EIA must include analyses of the impact of increased foot traffic and its associated activities</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the</p>
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	<p>near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat.</p> <p>Potable water will be obtained through reverse osmosis (RO) capable of producing up to 130,000 gallons of water per day. Renewable energy will power this process. The planned source of water for the RO system is brine water from a deep well. Brine disposal will be through deep well injection which will be cased and grouted to prevent contamination and will be designed, sited, and operated in a manner that ensures no adverse impacts to any freshwater resources on or off site.</p>
<p>A wastewater treatment plant will be constructed at the site. The EIA does not provide sufficient information about this process and its impacts. The EIA does not make clear if sewage will be treated to remove nutrients. As Dr. Thomas Goreau outlined in his comments (see Appendix), nutrient runoff poses the threat of harmful algae blooms, which cause mortality in reefs and other marine life. The EIA must include 1) more specific information about the plan for wastewater treatment and 2) additional studies on the potential for harmful algae blooms or other environmental impacts from possible runoff.</p>	<p>Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored. Additional information will be provided in the Environmental Management Plan, the second phase of this process as outlined in Bahamian laws and regulations.</p>
<p>Food and some solid waste will be incinerated on site. This has known environmental impacts and releases harmful emissions into the air. The EIA states that the waste that is not incinerated will be returned to the ship for “appropriate disposal.” There is not clear indication as to what exactly this means. The EIA must include more specific information about 1) how waste will be disposed and 2) the potential impacts of these disposal methods.</p>	<p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p> <ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken</li> </ul>

great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.

- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration or reduces the environmental impact thereof.

The EIA does not address that there are two other cruise ports — Half Moon Cay, and Princess Cay — located within 11 miles of Lighthouse Point. The cumulative impacts of runoff,

This is outside the scope of the EIA.

<p>pollution, foot traffic, waste disposal, and other concerns from three ports within this proximity could be severe. The EIA must include studies that analyze the impacts of aggregate port operations.</p>	<p>Disney can only speak to its proposed plan for development which strives to develop the site in an environmentally responsible way, create sustainable economic opportunities for Bahamians, celebrate Bahamian culture and further strengthen the community.</p>
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**CAMPAIGN COMMENTS – MARINE PROTECTED AREAS (PG. 14)**

<p>Disney has stated that their proposed port is compatible with a Marine Protected Area, but provides no proof that this is the case. Disney needs to submit supplemental studies as part of its EIA to prove that this development is compatible with the protected status of a Marine Protected Area</p>	<p>This is outside the scope of the EIA. The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p> <p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>
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**CAMPAIGN COMMENTS – MITIGATION OF ENVIRONMENTAL IMPACTS (PG 14)**

<p>The mitigation measures outlined in the EIA are extremely vague. The document provides no specific information about how mitigation will be accomplished. It does not include any details about how these measures will be implemented or analyses to determine their expected success rate. A truly comprehensive EIA must include robust analysis of mitigation efforts in addition to just a list of the measures.</p>	<p>Section 7 of the EIA provides extensive information about proposed mitigation measures. Further information will be provided in the Environmental Management Plan, the second step in this process as required by Bahamian laws and regulations.</p>
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Disney stated at the April 8<sup>th</sup> public consultation hosted by DEPP that this information is in the Environmental Management Plan (EMP). This document is not available to the public at this time. The public needs the opportunity to review and comment on both the EIA and the EMP before a decision is made by Disney and the Government. Disney needs to release the EMP to the public and provide an additional public comment period for both the EIA and EMP.

Per Bahamian laws and regulations, the process of public consultation is at the discretion of The Bahamas Department of Environmental Planning and Protection (DEPP) which has determined that completion of the EIA is the first phase in what is a multi-step process. The Environmental Management Plan (EMP) is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Per the process outlined by DEPP, the EMP is not submitted until after the EIA is accepted by Government. Detailed construction and operational EMPs will be submitted and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity. As with the EIA, DEPP will oversee the public review process of the EMP.

**CAMPAIGN COMMENTS – CORALS (PG. 15)**

The EIA’s review of coral reefs is completely contradictory. It states that there are zero coral reefs in the project footprint. This completely discounts the fact that construction, operation and human foot traffic can have extensive impacts in surrounding habitats outside of the actual footprint. They also completely contradict this claim by then stating that they will use transplantation to mitigate damage to corals in the footprint.

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Underwater habitat maps were constructed utilizing both geomorphic and biotic information to define standardized habitat classes (Coastal and Marine Ecological Classification Standard (CMECS); Mumby and Harbourn, 1999).

The project footprint encompasses mainly algal dominated hardbottom coral communities that are growing on ancient limestone bedrock and characterized by low coral densities with coral cover that rarely exceeds 2-3% of the bottom. True coral reefs are built on their own recently deposited dead coral skeletons, have high coral density with live coral cover often in excess of 20% of the bottom. True coral reefs occur throughout the LHP area but not within the Project footprint.

Disney’s planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor but will still cause some impacts to the seafloor associated with placement of structures (concrete piers, limestone revetment). A detailed analysis of benthic resources including corals within the

	<p>footprint of the marine facilities was undertaken in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities. Detailed benthic surveys using transects placed within the proposed development footprint quantified the species, density, and size of corals and other sessile invertebrates within the impact areas. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of <u>individual corals</u> could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.</p> <p>Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney’s success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p> <p>Additional information can be found in the EIA Section 4.2.2 – MARINE RESOURCES and Section 7.2.1 – CORALS</p>
<p>The EIA provides a baseline survey of corals at the site and even mentions potential damages during the construction phase, but does not at all mention the impact of 20,000 visitors a week on the corals at the site.</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse</p>

Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.

We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.

<p>We have consulted leading experts in Bahamian coral reef environments. Dr. Thomas Goreau, the President of the Global Coral Reef Alliance and Chief Scientist at Blue Regeneration, stated in his comments on the EIA: “the EIA describes the health of the coral reefs as only “fair”... but the survey omitted the areas of highest coral cover on the east side of Lighthouse Point. Because of their exceptional water quality and lack of human disturbance, these reefs are likely among the most pristine reefs left in the Bahamas” (see Appendix).</p>	<p>Quantitative surveys of the habitats were conducted by the EIA team mainly on the south area of the LHP area because this is where development impacts will be concentrated and because of the lack of existing survey information for this area. For the east side coral reefs, the EIA drew upon AGRRA survey results from surveys that had been conducted along the east side of LHP by the Perry Institute of Marine Science (PIMS) in 2016 and 2018. The categorization of “fair” for the east side reefs was based on the PIMS data and the Bahamas coral reef report cards (2016, 2020). The condition of the LHP reefs surveyed by PIMS were found to be below the Bahamas-wide average and Eleuthera average due mainly to low coral and high macroalgal cover.</p> <p>The proximity of reefs to human disturbance is not always a reliable predictor on their condition in part because coral bleaching and disease disturbance events have been shown to be linked to climate change and global/regional warming sea surface temperatures rather than localized conditions.</p> <p>Disney recognizes the importance of science-based information to inform the LHP development and operation. Monitoring the LHP marine habitats began last year and will continue as part of the long-term Environmental Management Plan. Disney is currently monitoring 36 benthic marine index sites in the LHP area, at least 7 of which are located on sensitive coral reef habitat on the East side, for any changes in the benthic and fish communities. Any adverse changes will be documented, sources of stress identified, and adaptive management actions taken to reduce or mitigate causes.</p>
<p>The corals at the site “are the only coral reefs in Eleuthera that are entirely up-current from sources of land-based pollution, and therefore of the highest national conservation importance” (see Appendix). An incredibly rare feature of the Lighthouse Point site is that “all three of the severely endangered Acropora elkhorn and staghorn coral species are found together in very shallow nearshore waters.” These species are very vulnerable and slight disturbances could have detrimental impacts. Potential disturbances from Disney’s proposed activities at LHP include:</p> <ul style="list-style-type: none"> <li>• nutrient discharge to coastal waters from sewage</li> <li>• turbidity caused by boat docking</li> <li>• erosion of landfill beaches onto the reef</li> </ul>	<p>The EIA surveys documented occurrences of live Acroporids (Elkhorn, Staghorn, and Fused Staghorn coral) on the south side mainly near the LHP beach area (EIA Figure 4-25). Nearshore surveys have since been conducted along much of the East-side beach suggesting that none occur within 45 meters of the beach. All of these nearshore coral reef areas are identified as “sensitive” and were purposely avoided in the Site development plan. The closest Acroporid colonies are approximately 600 meters from the proposed trestle/development area. This is well outside the 25 m buffer area identified where secondary impacts from drilling and piling placement may occur. Individual live corals within these sensitive areas will be monitored as part of the 36-site monitoring marine monitoring network for any possible changes during construction or operation of the facility and adaptive management actions implemented to prevent or mitigate against any losses.</p>

At this time, we do not expect that there will be increases in nutrients and turbidity to these sensitive nearshore areas as a result of the LHP development and operation. Turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation, and this will be part of the Environmental Management Plan.

Wastewater is addressed in the EIA Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting requirements. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored.

The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. Nonetheless, we acknowledge that there may be some additional erosion of these enhanced beaches particularly during large storm events that may cause impacts to adjacent beach areas.

We will pay special attention to the southeast beaches (Lighthouse Point and Telescope beaches) where sensitive corals occur within 45 meters of the beach. These areas already have fairly high levels of sedimentation and sand

	<p>movement, which limits live coral growth to elevated surfaces and reef edges. Sedimentation and coral conditions will be monitored on these and other inshore sensitive areas during construction and operation of the facility, Should sedimentation stress to sensitive inshore corals become apparent, management actions will be taken to mitigate against these impacts. Adaptive management actions may include removal of any accumulated sediments from nearshore corals following storms and other additional beach stabilization measures to minimize further erosion.</p>
<p>The EIA does not address the impacts of imported sand on coral reefs. As is outlined in Dr. Goreau’s comments (see Appendix), artificial beaches require imported sand to be dumped on the shoreline. Storm waves wash away this unstable sand, potentially burying offshore reefs. Given the increasing threat of storms as a result of climate change, this process is inevitable. The EIA must include studies to analyze the impact of sand run from the artificial beaches.</p>	<p>The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Sand is proposed to be placed above the water line where necessary to create a guest friendly beach with minimal hazards. Only native sand of similar composition and grain-size characteristics as currently exists around LHP will be utilized. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. Turbidity and sedimentation will be monitored with standard protocols in and around all nourished beaches during construction and operation and adaptive management measures will be taken should enhanced erosion and sedimentation be found to be impacting corals.</p>
<p>The EIA does not address the threat to corals posed by warm water expelled from the cruise ships at dock. As Dr. Goreau states, “Bahamian corals have large scale mortality from repeated high temperature bleaching events, and are on the edge of survival from global warming” (see Appendix). The EIA states that cruise ships at berth “will cycle approximately 5,000 cubic meters/hour of water through its internal system for cooling of chillers and other ship operations. The water is not mixed with any other systems or waste streams but will return the water approximately 5 degrees Fahrenheit (°F) warmer from intake to discharge.” Warmer water released into the ocean will add additional stress to corals located at the site and downstream.</p>	<p>The impact of ship cooling water discharge to corals and other marine resources in the LHP areas has been examined and is not thought to be significant for several reasons.</p> <p>First, the overall volume of water discharged per hour is low in comparison to the volume of water displaced by the ship and will be quickly dispersed through mixing. The berthing area is strongly influenced by tidal currents measured between 1-1.5 knots, which will mix and disperse cooling water away from the berthing areas (either to the NW or SE as measured during the EIA). In a worse-case scenario of no tidal movement, the water around the ship would be temporarily heated by less than a degree during one hour during a slack tide before being dispersed. This temporary increase in water</p>

The EIA must include analyses of the impacts of warm water runoff on corals and the associated threat of bleaching.

temperatures is not thought to be significant enough to disrupt corals that are directly within the berthing area footprint.

Second, discharged heated water will be less buoyant than the surrounding seawater and will likely float to the surface rather than sink where it would have the greatest impact to corals.

Finally, the proposed berthing area contains primarily coral communities (e.g., hardbottoms) that are dominated by sponges with few Scleractinian corals that are documented to be most susceptible to heat stress. The nearest coral reefs are over a km away from the ship berthing area and are not located within the tidally dominated envelope around the berthing area. Nonetheless, water temperatures will be closely monitored as part of the management plan for the LHP site. An array of 12 high resolution temperature loggers is already in place and this network will continue to be utilized during and after construction to inform adaptive management measures. If localized thermal heating on sensitive coral habitats is found within the LHP area that is linked to the Berthing of the vessel or other operating influences than appropriate mitigation measures will be taken.

Bleaching threat is a concern for all coral reefs around the world and is being factored into the LHP management plan. The bleaching threat is highest during the summer months (August/September) when water temperatures are at their peak. Should water temperature monitoring and bleaching forecasts predict bleaching threats to the LHP area, adaptive measures to reduce stress to sensitive coral reef areas will be implemented.

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA), coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs – considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.

	<p>Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation near Disney Castaway Cay.</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.</p>
<p>Disney needs to submit a supplemented EIA to 1) analyze the impact of up to four ships a week and 1 million visitors a year on the coral reef environments in the area 2) layout the mitigation measures that will be implemented to protect corals from the aforementioned risks and 3) prove that these measures will be effective.</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p>

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project.

The process of public consultation is at the discretion of the DEPP, which has determined that completion of the EIA is the first phase in what is a multi-step process for development approval. The Environmental Management Plan is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity. That said, Section 7 of the EIA provides extensive information about proposed mitigation measures.

The EIA states that “the extent to which recreationally important bonefish species are utilizing the LHP marine habitats is not well known.” According to Dr. Philipp, PhD, a scientific expert on bonefish, it is well-documented that LHP is a crucial habitat for bonefish migration.

Lighthouse Point is located just a few miles from vital spawning sites for bonefish, grouper, and other commercially important species that may migrate over 100 miles to reach spawning sites. The southern tip of Eleuthera is likely an important landmark in the migration route. The proximity of the shoreline to the deepwater drop-off, and the existence of major gyre currents in the area, make the area ideal for the development of juvenile bonefish. Shoreline disruptions to this area, such as the construction of a pier and increased boat and foot traffic, will cause fish to abort this migration pathway, as has been observed at Castaway Cay. This would reduce reproductive success and recruitment. It is likely to cause significant damage to the bonefishing industry on Eleuthera and the economies of the Family Islands at large.

Disney’s EIA does not include adequate pre-construction assessments of bonefish or other marine populations in the area or any post-construction plans to monitor the response of the fishery to the proposed development. Disney states that no bonefish were sighted at Lighthouse Point during their field surveys. This is likely due to the fact that bonefish pass through the shoreline of LHP on a seasonal basis, and only long-term studies can adequately assess their movements. Disney’s study amounted to less than three days in duration.

Disney needs to submit supplemental studies as part of its EIA that 1) provide adequate pre-construction surveys of the bonefish, grouper, marine mammal, and other marine populations in the area, as well as nearby spawning aggregations 2) analyze how construction and operation will impact the survival, feeding, reproduction, and migration of

The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.

Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to further research this starting fall 2021.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don’t anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp. Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don’t undergo substantial spatial ontogenetic shifts (e.g.,

these species 3) outline measures to mitigate impacts to these populations during and after construction.

juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental

Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, our work continues as part of our efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.

Construction noise impacts are addressed in the EIA Section 6.2.1.6 – CONSTRUCTION NOISE IMPACTS and EIA Section 6.2.1.8.1 – NOISE

	<p><b>LEVEL AVOIDANCE DURING CONSTRUCTION.</b> The noise level associated with pile driving varies significantly depending on the equipment utilized, the overall size of the piles, the substrate into which the piles are driven, the force applied, and the distance to the source but we recognize construction noise has the potential to impact marine mammals in the area. To address this during construction we will work with SMRU Consulting, the world’s leading marine mammal consultancy trained to assess and mitigate any potential impacts to marine mammals due to development, to determine impact zones, soft start construction strategies, and employ visual observation that will be in place to ensure construction noise is halted when marine mammals are in the area. Regarding marine noise once operational, as previously shared, Disney Cruise Line vessels will utilize shipping lanes already used by other commercial ships and use by Disney ships is not expected to significantly impact this area in the context with other ship traffic. During operation we will work with consultants to train vendors and staff on proper strategies to help protect marine mammals and a monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p>
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**CAMPAIGN COMMENTS – LEED CERTIFICATION (PG 17)**

<p>LEED Certification is the gold standard for sustainable construction. Disney’s EIA does not even mention the possibility of constructing all buildings to be LEED certified.</p> <p>Disney’s contractors are not listed even in the top 100 environmental consulting firms. If Disney is really planning to develop a forward-thinking, sustainable tourism operation, they should be consulting only the best of the best. Disney’s EIA must consider the possibility and examine the benefits of LEED certification for all on-site facilities.</p>	<p>One of Disney’s guiding principles for development at Lighthouse Point is to develop the site in an environmentally responsible way and all buildings will be designed with highest efficiency in mind. Most of the buildings planned for Lighthouse Point guest areas are open air which will promote sustainability by relying on natural lighting and air circulation. A number of back of house facilities will be more traditional structures that utilize air conditioning and artificial light and Disney will explore these buildings for possible LEED certification pending the construction means and methods proposed.</p>
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**CAMPAIGN COMMENTS – LACK OF CONSIDERATION OF ENVIRONMENTAL /SOCIAL JUSTICE (PG 17)**

<p>Today more than ever, Disney should demonstrate sensitivity to systemic injustices and willingness to take action to address environmental and social justice issues. At a minimum, Disney should understand how its project could add to environmental, social, and economic injustices that are present in South Eleuthera. As it stands, the EIA does not even mention environmental or social justice.</p>	<p>Social and environmental justice issues are not within the scope of the EIA. That said, the Walt Disney Company is committed to diversity and inclusion and, given the events of the past year in the U.S., we have further strengthened this commitment. For Lighthouse Point specifically, Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera.</p> <p>As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training, as well as small business grants across a variety of businesses.</p> <p>Additionally, the design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artists from Eleuthera and Antonius Robert, a master artists from Nassau, are anchoring Disney’s efforts as we work with local artists, historians and creatives in The Bahamas.</p>
<p>Corporate inequality has recently come to the forefront of the public discourse across the world. In 2019, The Walt Disney Company’s total revenue was reported at 65.39 billion U.S. dollars. In contrast, the communities of South Eleuthera are in critical need of economic growth, experiencing unemployment rates as high as 70-80%. Lighthouse Point needs to be developed in a way that is both sustainable and equitable. The EIA should consider whether in fact the proposed development for Lighthouse Point is, in its current state, a fair deal for The Bahamas and South Eleuthera.</p>	<p>Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.</p> <p>The economic benefits of the project have already been assessed and approved by the Government of The Bahamas through the Heads of Agreement, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has</p>
<p>As outlined in the above economics section, with the information that Disney has publicly released, it is still unclear how the economic benefits to the communities of</p>	<p></p>

<p>South Eleuthera will be even comparable to the company’s revenue from the port. In order to proceed responsibly and fairly, Disney must be explicit about how this deal is fair to The Bahamas and the people of South Eleuthera.</p>	<p>approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
<p>Further, environmental injustice is pervasive in The Bahamas. Environmental injustice specifies the reality that the most adverse impacts of environmental crises, pollution, and climate change are experienced by communities and countries of color. Hop Hopkins, the director of strategic partnerships for the Sierra Club, explained it clearly when he said: “you can’t have climate change without sacrifice zones, and you can’t have sacrifice zones without disposable people.” As stated above, The Bahamas has been identified as the most vulnerable nation in the Caribbean, and one of the most vulnerable nation’s in the world, to the impacts of climate change. This means that the Bahamian population is on track to be “disposed of” first. Disney must analyze their</p>	<p>This is outside the scope of the EIA. We have held ourselves to the same high standards at Lighthouse Point that we would for any project, anywhere in the world.</p>

<p>contributions to climate change not just to account for their impact on the environment, but also to account for the potential perpetuation of this injustice.</p>	
<p>Disney has chosen to develop their cruise port in one of the most economically depressed areas of The Bahamas. Disney is a major international corporation whose annual income is over five times the annual GDP of The Bahamas as a whole. The EIA must examine the economic benefits of the project to ensure an equitable deal. The EIA must include a full analysis of the economic equity of the project and any potential social justice ramifications. This must include analysis of 1) the contributions, for better or worse, of cruise port and cruise ship operations to environmental injustice and system inequality in The Bahamas 2) the comparative economic benefits of the cruise port for the company and the impoverished communities of South Eleuthera.</p>	<p>Oxford Economics provided an analysis of economic impacts associated with the Project over a 25-year timeline. The Project is conservatively expected to provide an \$805.1 million increase in Bahamian gross domestic product (GDP) and a \$357.5 million increase in Bahamian Government revenues, significantly exceeding concessions. Disney has not requested any concessions outside of what is offered through the existing Hotels Encouragement Act and Hotels Encouragement (Customs Duties Exemption) Regulations 1999, and this has been accounted for in the economic impact study.</p> <p>Direct economic impacts are outlined in Disney’s Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> </ul>

	<ul style="list-style-type: none"> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
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**OVERVIEW OF STILL OUTSTANDING QUESTIONS (PG. 19)**

<p>1. When will Disney release the 2018 Oxford Economics Study, which contains the analyses that support the purported economic benefits of the project? Will this study be updated?</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full report is published on the project website. There are no plans to further update the study.</p>
<p>2. What are the expected increases in Gross National Income (GNI) from the proposed port?</p>	<p>GDP is the standard, broad measure of the economy. This is the primary metric use to gauge the size of the economy and track growth, and it is the focus of government published data. Gross National Income (GNI) is another measure of the broad economy that includes income of residents earned abroad. Though minor, this can make a difference for some countries with a large number of foreign-owned businesses and this can impact outcomes in some countries. For the Bahamas, 2019 GDP was at \$13.6 billion while GNI was at \$13.0 billion. For this project Oxford Economics calculated the GDP boost of the project, not GNI.</p>
<p>3. Why didn’t Disney release a draft Environmental Management Plan along with its EIA for its proposed project at Lighthouse Point?</p>	<p>Per Bahamian laws and regulations, the process of public consultation is at the discretion of the DEPP which has determined that completion of the EIA is the first phase in what is a multi-step process. The Environmental Management Plan (EMP) is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Per the process outlined by The Bahamas Department of Environmental Planning and Protection (DEPP), the EMP is not submitted until after the EIA is accepted by Government. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity. As with the EIA, DEPP will oversee the public review process of the EMP.</p>
<p>4. The EIA primarily assesses the environmental impacts of the construction of the cruise port, but what are the environmental impacts of 1 million visitors a year and long-term operation of the port?</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000</p>

	<p>guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.</p>
<p>5. How will sunscreen usage from 1 million visitors a year impact the reefs, marine life, and coastal habitats at Lighthouse Point? How will Disney mitigate these impacts?</p>	<p>We have taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p>

<p>6. What are the projected environmental impacts of increased human foot traffic at lighthouse point? How will Disney mitigate these impacts?</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat.</p>
<p>7. What are the long-term environmental impacts of energy generation at the site?</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>To provide further clarity, The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company's business globally, including Disney Cruise Line.</p> <p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p>

	<p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> <li>• Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution</li> <li>• Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity</li> <li>• Building envelopes designed to reduce energy loss</li> </ul> <p>We will continue to refine the performance of the operation and will be installing meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.</p>
<p>8. What are the long-term environmental impacts of water discharge and waste generation and handling at the site?</p>	<p>Potable water will be obtained through reverse osmosis (RO) capable of producing up to 130,000 gallons of water per day. The planned source of water for the RO system is brine water from a deep well. Brine disposal will be through deep well injection which will be cased and grouted to prevent contamination and will be designed, sited, and operated in a manner that ensures no adverse impacts to any freshwater resources on or off site.</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste</p>

facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO

	<p>regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.</p>
<p>9. What are the long-term environmental impacts of desalination (and the toxic wastewater produced by this process) at the site?</p>	<p>Potable water will be obtained through reverse osmosis (RO) capable of producing up to 130,000 gallons of water per day. The planned source of water for the RO system is brine water from a deep well. Brine disposal will be through deep well injection which will be cased and grouted to prevent contamination and will be designed, sited, and operated in a manner that ensures no adverse impacts to any freshwater resources on or off site.</p>
<p>10. What are the long-term environmental impacts of waste incineration at the site? The EIA states that the waste that is not incinerated will be returned to the ship for “appropriate disposal.” There is not clear indication as to what exactly this means. What is Disney’s “appropriate disposal” method?</p>	<p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p> <ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.</li> <li>• Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.</li> </ul>

	<ul style="list-style-type: none"> <li>• We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.</li> <li>• Specialized digesters for waste treatment</li> <li>• Air hand dryers</li> <li>• Water bottle fill stations</li> <li>• Modular construction techniques</li> </ul> <p>All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.</p>
<p>11. What is the level of emissions associated with the Disney cruise ships that will pass through the port? How will this contribute to climate change long-term?</p>	<p>The Walt Disney Company recently released its environmental goals for 2030, which serve as a compass for the company’s business globally, including Disney Cruise Line. And while we do not expect the proposed development at Lighthouse Point to have a material impact on climate change, we recognize the role greenhouse gas emissions play in climate change globally.</p> <p>As of Jan. 1, 2020, the International Maritime Organization instituted a regulation that requires all ships to use 0.5% sulfur fuel. Disney Cruise Line has taken this a step further by using 0.1% low sulfur fuel fleetwide at all times.</p> <p>In addition, we are investigating a number of alternatives to reduce DCL’s reliance on fossil fuels. Right now, the marketplace simply doesn’t have the right technical solutions at the scale we need. We are committed to collaborating with industry groups and investing in research and development for low carbon fuel innovation.</p> <p>In the meantime and after careful consideration, we determined using LNG for our new ships is the best option currently available. LNG yields a more than</p>

	<p>20% reduction in carbon emissions and an 85-100% reduction in other emissions (e.g., sulfur, particulate, nitrogen oxide). Our new ships have been designed and will be operated in a way that effectively reduces the chance of methane leaks. We will work with our suppliers to ensure extraction and transportation is as responsible as possible.</p> <p>Only one ship at a time is able to visit Lighthouse Point. As noted in the EIA (3.1.4.3 Boat and Vessel Traffic), the ship will operate some of its engine capacity to provide power for the ship’s needs. The combustion products are exhausted through the stack, typically located at highest point of the ship. The stack height may range from 150 feet to 190 feet or more. Considering the time the vessel is at berth in a 24-hour day, and exhaust discharge height and open-air conditions, it is reasonable to conclude that there will be no adverse effects on the local air quality due to ship activity while at berth. DCL's internal policy is to keep visible emissions below 20 percent opacity while in port, except for initial startup and shut down of engines.</p> <p>DCL is consistently recognized as an industry leader from an environmental standpoint. All four DCL ships have the U.S. Coast Guard’s QUALSHIP 21 with Zero-E designation, which recognizes exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating a commitment to environmental stewardship. DCL also regularly wins awards such as the Blue Circle Award for voluntary efforts to conserve energy and reduce emissions from Port of Vancouver.</p>
<p>12. Only 30% of the site energy needs will be satisfied with renewable energy sources. This is nowhere near adequate in a new age of sustainable development. Why has Disney only committed to 30% renewable energy sources? The EIA states that the feasibility of using a greater percentage of renewable energy is “being evaluated.” This evaluation should have been completed before the release of the EIA and must be completed before a final decision is made on the project.</p>	<p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as</p>

	<p>our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> <li>• Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution</li> <li>• Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity</li> <li>• Building envelopes designed to reduce energy loss</li> </ul> <p>We will continue to refine the performance of the operation and will be installing meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.</p>
<p>13. What are the projected increases in sea level at the site over the next 50 years? How will sea level rise impact the proposed port and its infrastructure long-term? How will this impact the long-term economic viability of the project? How will Disney mitigate these impacts?</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p>
<p>14. What are the projected increases in storm frequency and intensity as a result of climate change in the area? How will increasing storm frequency and intensity impact the proposed port and its infrastructure long-term? How will this impact the long-term economic viability of the project? How will Disney mitigate these impacts?</p>	<p>The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency’s (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include</p>

	<p>predicted storm surge, still water levels and wave heights for the 50-, 100- and 500-year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p> <p>All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p> <p>This project represents a significant, long-term investment for Disney Cruise Line and it is in our best interest to ensure it is built and operated in a way that will provide long-term economic viability. As noted elsewhere, the economic impact study looked at a 25-year time horizon.</p>
<p>15. Exactly how is this project compatible with the area’s status as a proposed Marine Protected Area?</p>	<p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p> <p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco</p>

	where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.
16. How will the port be impacted by Covid-19 or other future pandemics? Will Disney mitigate the threat of Covid-19 and future pandemics? How will Disney protect their passengers, employees, and residents of Eleuthera from this threat?	Pandemic-related issues are not within the scope of the EIA, Disney Cruise Line has among the highest public health inspection scores in the industry and has developed a multi-layered approach to dealing with COVID-19 and other illnesses onboard. Since our cruises to The Bahamas generally originate from the U.S., the ships must adhere to stringent U.S. Centers for Disease Control guidelines. Additional human health and safety issues, including pandemic-related issues, will be addressed as part of the Environmental Management Plan.
17. Disney has stated that they intend to have a seabed lease of an as-yet-undetermined area for \$1,000/acre/year (P. 6 HOA). Does Disney intend to restrict access to boat traffic to marine areas and beaches as they do at Castaway Cay?	The Developer will provide all citizens and residents of The Bahamas with access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. Marine traffic will also be managed working with the Government to ensure port security.
18. How will Disney mitigate impacts to threatened Piping Plover populations?	As shared at the April 8, 2021 Department of Environmental Planning and Protection public meeting for Lighthouse Point at minute 27:30, avian surveys conducted helped inform the decision to conserve and protect a portion of the site at Bottle Bay Beach where piping plovers have been observed to ensure we can maintain a wintering population of this species on the site. Additional information on this can be found in EIA Section 7.3.1.1 – PIPING PLOVERS. Additional information will also be included in the Environmental Management Plan.
19. How can Disney claim that the construction activities will improve the habitat for the Kirtland’s warbler?	Kirtland’s warblers are addressed in the EIA Section 7.3.1.3 – Kirtland’s Warblers.  Currently we are only developing 16% of the property with a maximum of 20% through the life of the operations. We agree that the type of vegetation in modified habitats is of critical importance to determining what wildlife those habitats will support. At LHP, areas impacted by site development will be revegetated using a landscaping palette of native plants, with an emphasis on those plant species that provide food resources for birdlife. Consequently, while it will take time for this vegetation to fully mature, revegetated habitats will provide the resources needed to support the birdlife referenced in the EIA as preferring less dense areas. Through our terrestrial monitoring program, we have established a baseline of the avian community diversity in areas to be developed, and we will be able to assess how that birdlife responds to revegetated areas following construction. Based on our findings, we will

	adaptively manage revegetated habitats to maximize their conservation value to LHP wildlife.
20. How will Disney address and mitigate impacts to other endangered and threatened species, such as endangered sea turtles that reportedly nest on Lighthouse Point beach?	The presence of sea turtles is addressed in the EIA section 4.2.2.7.3 MARINE REPTILES. Juvenile green sea turtles and one hawksbill sea turtle were observed in the water during marine surveys. No sea turtle nesting activity has been observed to date. That being said, Disney has more than 15 years managing nesting sea turtles at Disney’s Vero Beach Resort in Florida, which is adjacent to a beach with the highest density loggerhead sea turtle nesting activity in the world. Surveys for nesting will be performed at Lighthouse Point applying the same standards and protocols used at Disney’s Vero Beach Resort which abide by the regulations of the U.S. Fish and Wildlife Service (Marine Turtle Conservation Handbook, FWC, 2016) and can be found at <a href="https://myfwc.com/license/wildlife/marine-turtle-permit/">https://myfwc.com/license/wildlife/marine-turtle-permit/</a> . If sea turtle nests are not detected at Lighthouse Point over several years of regular surveys, Disney will adopt a system for employees to report any observations of sea turtle nesting activity. If sea turtle nesting activity is detected at any point, nest protection protocols will be implemented.

**PROPOSED TIMELINE FOR THE ENVIRONMENTAL REVIEW (PG. 20)**

1. Disney will prepare and publish a draft scope of work for supplementing its current EIA in order to address its numerous deficiencies. The supplement will include the Environmental Management Plan.	We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. DEPP oversees the public consultation process.
2. Disney and DEPP should conduct a public consultation on the final scope of work.	
3. Disney will revise the draft EIA to 1) address public comments and input from scientists and experts and 2) supplement the EIA with additional studies required to adequately address issues raised in the public consultation period.	
4. Publication of Disney’s supplemental draft EIA for public review.	
5. A secondary public consultation period.	
6. Resubmission of the EIA and its consideration.	
7. Decision on the Environmental Authorisation by the Department.	

**EXPERT COMMENTS – LAWRENCE PRATT, PROFESSOR IN SUSTAINABLE DEVELOPMENT, INCAE BUSINESS SCHOOL (PG 22)**

<p><b>a.</b> The EIA states a very large number claiming it as a contribution to GDP, and no other economic information is found. This is problematic and leads to gross misunderstanding of the real benefits and costs to the country and island. GDP counts both costs and benefits as benefits (e.g. sales to tourists and disposing of tourists’ waste), effectively ‘double counting’ the impact of development if further information is not provided. It is standard practice to detail direct, indirect and induced effects as well as estimated effects on tax revenues and value added in input-output analyses to shed additional light on the likely size of local net benefits and costs.</p>	<p>The study conducted by Oxford Economics is an economic impact study that is spending based. The metrics being referenced would be included in a cost-benefit analysis. The full economic impact study is published on the project website.</p>
<p><b>b.</b> Claiming benefits in express economic and monetary terms without expressing the related costs in similar terms is highly misleading to readers and decision-makers.</p>	<p>The study conducted by Oxford Economics is an economic impact study that is spending based. The metrics being referenced would be included in a cost-benefit analysis. The full economic impact study is published on the project website.</p>
<p><b>c.</b> GDP is a measure of gross billing by the proponent, which is an accounting measure that has little relationship to Bahamian national accounts or in no way reflects the actual income effects in the country. This number greatly overstates economic impact of Disney’s sales in the Bahamas as there is no reason to believe the actual sales, let alone the proceeds will remain in the country and it is unclear in the analysis presented. Based on analysis of other cruise ship tourism expenditures in the Caribbean, most visitor purchases are likely to take place on the ship or in Disney businesses on shore. As a result, a more correct gross number should be the incremental effect on Gross National Income (or Product) which measures the economic activity of Bahamian nationals wherever they reside and Bahamian businesses. This number too will likely overstate economic impact, but is at least a more defensible starting point.</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full economic impact study is published on the project website. It clearly outlines data sources and methods used. Oxford Economics used a proprietary input-output model to complete the economic impact modeling. The model is based on industry output, value added, income, and employment data generated by The Bahamas Department of Statistics and the Bahamas Ministry of Finance.</p>
<p><b>d.</b> Given that GDP is the only economic number presented, there is no explanation as to how the GDP number was</p>	<p>The full economic impact study is published on the project website. It clearly outlines data sources and methods used. Oxford Economics used a proprietary</p>

calculated. Historic levels of spending shoreside are considerably lower. To arrive at this gross sales number, the proponent is either	input-output model to complete the economic impact modeling. The model is based on industry output, value added, income, and employment data generated by The Bahamas Department of Statistics and the Bahamas Ministry of Finance.
<b>i.</b> including all of its receipts from sales to guests, not just the portion that is territorial to The Bahamas <b>ii.</b> using a level of guest spending much higher than observed in studies and reported by the industry	
<b>iii.</b> considering a far greater guest level than that reported in the EIA itself	
<b>iv.</b> claiming generous multiplier effects without explaining how this multiplier was estimated.	
<b>v.</b> or some combination of one or more of the above points.	
<b>vi.</b> There is no information as to what cost to the country (national and island) this purported economic benefit is to be derived. Costs that need to be considered include: increase infrastructure spending (which, of course, also contribute positively to GDP estimates, but not necessarily to the wellbeing of Bahamians), costs of air pollution (from additional electrical generating capacity), tax benefits and concessions, loss of use of space by residents, among others.	This is not within the scope of the EIA.
<b>2.</b> Lack of consideration of use of the affected area over time.	
<b>a.</b> The study is conducted for the construction phase, but makes little mention of the projected years of operations, and does not appear to consider the effect of high levels of visitation on critical and sensitive resources. While it may be conceivable that the construction phase has relatively small impact, it is difficult to imagine how the proposed level of visitation could have NO significant impact on sensitive environmental resources as well as cultural resources from hundreds of thousands of visitor days per year.	Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.
<b>b.</b> Cumulative impacts are not considered – which appears to be a very critical oversight given the high levels of expected visitation and the long projected life of the project	
<b>c.</b> There is little to no analysis of impact variables from visitation, including the water discharges from hundreds of thousands of visitor days per year, air emissions from	
	We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate

additional electrical production (or the sources of this energy and their local and climate change impact) and solid waste management over time.

will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat.

Historic resource surveys were completed in February 2019 and January 2020 and a site visit with the Antiquities, Monuments and Museums Corporation (AMMC) occurred in February 2020. Nine ruins and several ancillary features have been identified onsite predominantly in the northern area of the property in the vicinity of Old Bannerman Town. There are no anticipated impacts to these historic structures and there are no plans to develop where any ruins or historic structures are located.

Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in

all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.

- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste. We are also exploring waste to energy capture and will optimize water conservation.

We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:

- Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption
- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

<p><b>d.</b> There is no discussion of costs associated with protection, maintenance, recovery or post-project restoration of affected areas. Establishing clear contingent costs and responsibilities for ongoing costs and closure costs is standard practice in most countries when dealing with projects with this level of impact.</p>	<p>This is not within the scope of the EIA.</p>
<p>3. Comparison basis best practices in EIAs require examining the proposed project versus some comparative scenario. The study does not clearly state what comparative scenario it is considering. If it is versus a “no-development scenario” it should be stated explicitly and present data to document that baseline. If it is versus some other scenario, it should be identified and an appropriate baseline established.</p>	<p>Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.</p> <p>Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.</p> <p>The report that proposed a new Marine Protected Area in South Eleuthera points out that the reef near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p>

	<p>Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that would result from the project and development. This includes the creation of at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, and ongoing training and professional development programs Disney has already committed to that are designed to build capacity and maximize opportunities for Bahamians.</p>
<p>4. No consideration of social issues. There will be significant direct and indirect impacts to the local community, both positive and negative, including environmental health, access to natural and cultural resources, as well as changes to traditional employment. While this may not be explicitly required in EIAs in The Bahamas, it is a very noticeable absence in the overall picture put forth in the EIA.</p>	<p>Social justice issues are not within the scope of the EIA, The Walt Disney Company is committed to diversity and inclusion. Given the events of the past year in the U.S., we have further strengthened this commitment. For Lighthouse Point specifically, it is important to us that this project is inclusive. Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera. As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and trainings, and a portion of the funding provided by Disney will be used for small business grants across a variety of businesses.</p> <p>Additionally, the design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artists from Eleuthera and Antonius Robert, a master artists from Nassau, are anchoring Disney’s efforts as we work with local artists, historians and creatives in The Bahamas.</p>

**EXPERT COMMENTS – WOODS HOLE GROUP (PG 25)**

<p>Woods Hole Group’s review of the Lighthouse Point EIA identified the need for additional information, analysis and/or clarification with regard to coastal processes, sea level rise, storm surge, resilient design, water quality and greenhouse gas emissions. As detailed below, it is our view that the impact assessments for these subject areas are not</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process,</p>
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<p>sufficiently detailed or site-specific. Sound decision making for a major development project such as the one proposed for Lighthouse Point should be based on a complete and robust assessment of project alternative impacts.</p>	<p>will be as well. The Bahamas Department of Environmental Planning and Protection oversees the public consultation process.</p>
<p><b>Coastal Processes</b> The EIA’s review of existing coastal processes states “Baseline information is founded mostly on historical aerial photographs and verbal conversations with local residents familiar with the area.” A more comprehensive study of littoral transport and shoreline evolution would typically be performed to inform existing conditions and the evaluation of proposed shoreline enhancement/management alternatives.</p>	<p>There are no known historical surveys or information regarding shoreline changes over time for Lighthouse Point. Aerial photography and historical knowledge from local residents who have lived on Eleuthera for decades is the best source for baseline information today. During the development stage, Disney will complete baseline coastal surveys to document existing conditions and monitor changes over time. Once a baseline has been established, littoral transport can be evaluated; however, based on all the information currently available for the site, longshore sediment transport is minimal.</p>
<p>The proposed beach area enhancements include “Coastal stabilization structures...limited to upland areas only above the mean high water (MHW) line to contain the beach areas and minimize erosion.” Further clarification on the need for these structures should be provided as it is stated “All these areas are relatively stable sand beach areas that naturally hold and accrete sand.” The use of rock groin structures poses additional impacts in loss of beach habitat. A comprehensive study of coastal processes should be undertaken to inform the need for coastal stabilization structures above MHW in areas of beach expansion. Estimates of longshore sediment transport rates and beach change with and without the proposed structures would help determine the need for and potential influences to adjacent shorelines.</p>	<p>Any structures will be placed in the expanded upland areas well above the high-water line in areas where casuarina have been removed. The structures will help stabilize the newly created dunes and are planned well outside of the surf zone. They will have no impact on longshore sediment transport. During the development stage, Disney will complete baseline coastal surveys to document existing conditions and monitor changes over time. Once a baseline has been established, littoral transport can be evaluated; however, based on all the information currently available for the site, longshore sediment transport is minimal.</p>
<p>The location of the two bottom-mounted acoustic Doppler current profiler (ADCP) instruments is needed to better understand/interpret the wave and current data presented in the EIA.</p>	<p>ADCP placement was reviewed and approved by The Department of Environmental Planning and Protection as part of the EIA process. Disney placed devices in shallow (15’) and deep (40’) water to quantify the transition of deep water to shallow water within the footprint of the pier. This work was performed with proper approvals from the Department of Environmental Planning and Protection.</p>
<p>In presenting impacts to beach enhancement areas, the EIA states “The expansion of beaches could have secondary impacts on some nearshore hardbottom, corals and</p>	<p>Beach widening will be created by removing Casuarina trees and naturally occurring vegetation from the backdune, and beach area expansion is planned to extend landward from the foredune in the beach areas as shown in Figure</p>

<p>submerged aquatic vegetation if subsequent shoreline erosion takes place.” A cross-shore sediment transport model or related analysis would typically be conducted to assess the footprint and thickness of sediment transported from the beach to the nearshore zone during storm conditions. This is needed to better quantify potential secondary impacts of beach fill spreading on nearshore hardbottom, corals and submerged aquatic vegetation habitats.</p>	<p>31- of the EIA. Additional information may be found in the EIA Section 6.2.1.7.3 – IMPACTS DUE TO BEACH AREA ENHANCEMENTS. There are no known historical surveys or information regarding shoreline changes over time for Lighthouse Point. Aerial photography and historical knowledge from local residents who have lived on Eleuthera for decades is the best source for baseline information today. During the development stage, Disney will complete baseline coastal surveys to document existing conditions and monitor changes over time. Once a baseline has been established, littoral transport can be evaluated; however, based on all the information currently available for the site, longshore sediment transport is minimal. Additionally, all planned nourishment is well outside of the surf zone, and sediment transport is not anticipated as part of the coastal work.</p>
<p><b>Sea Level Rise, Storm Surge and Climate Resilient Design</b> It is appropriate to assess the impacts of climate-related hazards over the design life of the project. Increasingly, states are requiring these types of assessments in environmental review for projects, and the Council on Environmental Quality recently re-released “2016 Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews” signaling broader commitment to incorporating these impacts into project decision-making.</p>	<p>Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency’s (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500-year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p>
<p>Since the project has a stated design life of 50 years, the planning horizon for assessment should be approximately 2070 (2080 if construction is anticipated through 2030). The EIA uses a sea level rise projection of 1.0 foot relative to 2017 levels over the 50-year design life of the Project. Although this projection aligns with the projections presented in the 2014 Bahamas Second National Communication to the UNFCCC, it is not consistent with the current state of the practice in sea level rise planning.</p>	<p>All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal</p>
<p>Current best practice is to develop local sea level rise projections using the “K14” (Kopp et al., 2014) approach which provides conditional probability distributions for different greenhouse gas emissions trajectories and enables</p>	

<p>integration of these probabilistic projection into different scenarios to support asset planning and decision-making. This is the approach applied in the Fourth National Climate Assessment (Sweet et al., 2017) for the United States, adopted by multiple states for climate planning (including Massachusetts, California and New Jersey), and also used by Climate Central to develop projections for the Caribbean (Strauss and Kulp, 2018).</p>	<p>landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>
<p>For example, the Climate Central probabilistic sea-level projections for Settlement Point, Bahamas are 0.28 to 0.32 meters above the baseline (year 2000 mean sea level) for the range of 2050 emission scenarios and 0.54 to 0.83 meters above the baseline for the range of 2100 emission scenarios. Thus, the 1.0 foot relative to 2017 used in the EIA is likely on the low end of possible sea level rise projections over the stated design life even when not accounting for contributions from ice sheet melt. The EIA should present the range of potential sea level rise scenarios over the project design life overlaid with the development plan in order to visualize the potential impacts. For instance, the following figures show areas of inundation 0.3 meters and 0.8 meters above the present local mean higher high water (MHHW). Review of these maps suggests that the proposed South Family Beach area south of Shad Pond and White Pond is particularly vulnerable to future tidal inundation over the stated life of the development.</p>	
<p>For regional context, the Southeast Florida Regional Climate Change Compact (the Compact) released updated Unified Sea Level Rise Projections in 2019. The Compact states that “by 2070, sea level is projected to rise 21 to 54 inches above 2000 mean sea level” (MSL) and recommends that projects with a planning horizon up to 2070 plan for sea level rise between the IPCC Median and NOAA Intermediate High scenarios (21 to 40 inches or ~0.5 to ~1.0 meter above 2000 MSL).</p>	
<p>As noted in the EIA, storm surge is a significant vulnerability for Lighthouse Point, which experiences</p>	<p>Potential storm surge scenarios are addressed in the EIA Section 4.1.8 - PROJECT SITE TIDAL DATUMS, which references the same reports. All</p>

<p>hurricane related impacts once every 2.85 years and a direct hit once every 9.57 years, on average. The quantitative review of recent storm events in the EIA does not include Hurricane Dorian and its impacts on Eleuthera. Hurricane Dorian is noted as having a major impact in the Bahamas, but storm surge is not provided for comparison to other events. This would provide an additional (and recent) historical account of the potential flood risk at Lighthouse Point to better inform design criteria, siting of critical infrastructure, fuel and chemical storage areas.</p>	<p>onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>
<p>A map of potential storm surge with projected sea level rise over the 50-year design life of the project should be included in the EIA. Potential sources of probabilistic extreme storm water levels for the area include the recent US Army Corps of Engineers South Atlantic Coastal Study or FEMA’s South Florida Study. Project elements overlaid on this map would help to determine the need for a more detailed vulnerability assessment.</p>	<p>This is not within the scope of the EIA, however, potential scenarios can be found in the EIA Section 4.1.8 - PROJECT SITE TIDAL DATUMS, which references the same reports. Additional assessments will take place as the project progresses.</p>
<p>The EIA states that the Project will be designed to “withstand any impacts due to climate change” but specifies only that structures will be elevated at or above elevation 12 ft MSL. According to the project site tidal datums reported in the EIA, 12 ft MSL correlates to approximately 10.5 ft above MHHW. This vulnerable area should be overlaid with project development plans to determine the vulnerability of project elements, and the return period of such a storm event should be stated in order to assess risk. Initial mapping suggests that, contrary to the EIA’s statement regarding locating development above vulnerable areas, project related development is proposed within this vulnerable area at or below 12 ft MSL, as shown below.</p>	<p>The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency’s (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500- year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.</p>
<p>The stated design flood elevation of 12 ft MSL is also lower than stated historical storm surge levels. A complete assessment of storm surge vulnerability would include, at a minimum, a map of the inundation from the surge associated with the storm of record or the results of NOAA Sea, Lake</p>	

<p>and Overland Surges from Hurricanes (SLOSH) model results for the area. Based on the storm surge reported in the EIA from Hurricane Andrew (1992), a 23 ft storm surge at Lighthouse Point would overwhelm the project area as shown below. Careful consideration of storm-related vulnerability is critical to making planning and design decisions in areas that are exposed to hurricanes.</p>	
<p>Since there is present risk of flooding and damage, which will be accentuated in the future with climate change, the impacts due to climate change should be estimated for the stated design flood elevation for the Project. We recommend appropriate design flood elevations for roadways, buildings and infrastructure be developed based on a review of the storm of record as well as an assessment of regional sea level rise, probabilistic extreme storm water levels, and extreme wave conditions. It was noted that extreme wave conditions were not quantified in the EIA. A review or study of expected extreme wave conditions is needed to ensure resiliency measures and structures will be designed to withstand wave forcing (in addition to wind and storm surge levels).</p>	
<p><b>Water Quality</b> For the proposed Reverse Osmosis (RO) water treatment facility, the EIA states “Brine that is a by-product of the RO system will be discharged through groundwater injection or offshore, pending final Project design.” Depending on the method selected for discharge, there will be impacts to groundwater resources and/or nearshore water quality. The EIA should clarify these potential impacts and, pending the selected design, the zone of influence or mixing zone should be determined in the receiving water to quantify the impacts and the potential need for mitigation measures, such as diffusers and/or locating the discharge to minimize resource impacts.</p>	<p>Potable water will be obtained through reverse osmosis (RO) capable of producing up to 130,000 gallons of water per day powered by renewable energy. The planned source of water for the RO system is brine water from a deep well. Brine disposal will be through deep well injection which will be cased and grouted to prevent contamination and will be designed, sited, and operated in a manner that ensures no adverse impacts to any freshwater resources on or off site.</p>
<p><b>Greenhouse Gas Emissions</b> The EIA states that the Project will not have a “material impact” on climate change and estimates Project related</p>	<p>Initial emissions estimates were completed before the design of the project was complete. These initial estimates include emissions associated with the direct combustion of fossil fuels for heating, cooking, electricity, waste incineration,</p>

<p>greenhouse gas emissions at 3,100 metric tons CO2 per year, but there is no detail provided to substantiate this estimate or put it into context to evaluate the materiality of the impact. It is unclear what emissions are included in this figure.</p>	<p>and transportation, as well as those associated with the use of refrigerants. The initial estimates of 3,100 metric tons CO2 per year were based on achieving the minimum requirements from the Heads of Agreement for 30% renewable energy as well as our past operational environmental data.</p> <p>The current design of the island is aiming to use renewable energy to meet 90% of electricity needs, utilizing onsite solar panels and batteries, which will further reduce operational emissions. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. This updated design greatly reduces the size of our emissions footprint beyond initial estimates.</p> <p>We have also identified additional opportunities to reduce the amount of combustion (scope 1) emissions from project operation, through efficiencies and electrification. And there is at present no scope 2 emissions source for Lighthouse Point.</p>
<p>Standard guidance in many states requires project proponents to calculate the greenhouse gas emissions related to project operation (and in some cases from construction). The types of emissions typically quantified fall into two categories – Scope 1 and Scope 2. Scope 1 emissions are direct emissions that occur on site from sources that are owned or operated by the organization (e.g. fuel combustion for heating, from company owned vehicles, or gas-powered landscaping equipment). Scope 2 emissions are indirect emissions that are associated with the use of electricity or steam generated off-site.</p>	<p>Initial emissions estimates were completed before the design was complete. These initial estimates include emissions associated with the direct combustion of fossil fuels for heating, cooking, electricity, waste incineration, and transportation, as well as those associated with the use of refrigerants. The initial estimates of 3,100 metric tons CO2 per year were based on achieving the minimum requirements from the Heads of Agreement for 30% renewable energy as well as our past operational environmental data.</p> <p>The current design of the island is aiming to use renewable energy to meet 90% of electricity needs, utilizing onsite solar panels and batteries, which will further reduce operational emissions. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. This updated design greatly reduces the size of our emissions footprint beyond initial estimates.</p> <p>We have also identified additional opportunities to reduce the amount of combustion (scope 1) emissions from project operation, through efficiencies</p>

	<p>and electrification. And there is at present no scope 2 emissions source for Lighthouse Point.</p>
<p>Scope 3 emissions include those emissions not in Scope 1 or 2, not under the direct control of the organization but related to its operation (e.g. employee commuting, supply chain, visitor trips, solid waste management). Although Scope 3 emissions are generally not required in EIA greenhouse gas assessments, they can represent a large portion of overall project life cycle emissions depending on the nature of the project. At a minimum, the EIA should define the boundary of the emissions calculation, detail the assumptions used in the calculation of Scope 1 and 2 emissions, and address (at least qualitatively) Scope 3 and construction-related emissions.</p>	<p>This is not within the scope of the EIA.</p> <p>The Walt Disney Company recently released its environmental goals for 2030, which includes a commitment to define a science-based reduction goal for the company’s Scope 3 emissions footprint by the end of 2022.</p> <p>Our current goals are taking action on Scope 3 emissions where we can, focusing on reducing the impact of materials in our supply chain.</p> <p>Our company manages a diverse set of businesses, each with very different operations and sources of emissions: cruise lines, theme parks and resorts, media production and distribution, and consumer products, which are underpinned by an extensive licensing model. Because of this business diversity, identifying all sources of our Scope 3 emissions – which can range from viewing a movie to the lifecycle of our physical products – presents a tremendous challenge, and one we are working to complete in order to accurately account for, track and reduce those emissions.</p>
<p>The EIA states that the Project will reduce carbon emissions by incorporating sustainable design, building, and management practices. Aside from a commitment to 30% renewable energy, no project specific sustainability initiatives or certifications are noted. More detail on the Project’s sustainability commitments should be provided. For instance, design and management choices may impact energy use, water use, material consumption and/or waste generation, and ultimately Project-related emissions.</p>	<p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill by diverting our operational waste from landfill or incineration. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p>

We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:

- Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption
- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

The project will be zero waste to landfill. The goal is to minimize any waste that comes onto the site in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations, among others. The primary waste generated will be organic waste, which will be treated with a biodigester. Modular construction techniques will also be used.

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

**EXPERT COMMENTS – CREST (PG 32)**

<p>The draft EIA makes frequent mention of “best management practices” or BMPs that will be outlined in the Environmental Management Plan (EMP), but no such draft EMP is available to the public. Without an EMP, it is impossible to assess Disney Cruise Line’s (DCL) proposed mitigation plans or determine if sustainable tourism, biodiversity, and cultural resources BMPs are even being considered. The EMP is essential and must include rigorous BMPs that meet destination stewardship criteria at the highest standard to address visitor distribution, coastal/reef protection, wildlife monitoring, renewable energy, overfishing, water and air pollution, and waste management.</p>	<p>Per Bahamian laws and regulations, the process of public consultation is at the discretion of the DEPP which has determined that completion of the Environmental Impact Assessment is the first phase in what is a multi-step process. The Environmental Management Plan (EMP) is the second phase of this process and it will address specific measures that will be taken relative to the species and habitats identified in the EIA. Per the process outlined by The Bahamas Department of Environmental Planning and Protection (DEPP), the EMP is not submitted until after the EIA is accepted by Government. Detailed construction and operational EMPs will be submitted to Government and these will ensure that the development and operation of Lighthouse Point proceeds with adequate controls that protect the long-term health of the environmental resources of the Project site and immediate vicinity. As with the EIA, DEPP will oversee the public review process of the EMP.</p>
<p>Up to now, DCL has had a generally good record of operations in the Caribbean. That said, virtually all proposed tourist activities outlined in the draft EIA represent unsustainable mass tourism options that lack innovation and are more consistent with an amusement park than a future-thinking, sustainable tourism destination model. The draft EIA estimates that between 624,000 and 1,040,000 annual visitors will descend on the 154 acres of developed land and coastline, with rather standard tourism offerings around sun and sand, thrills, and no emphasis on ecotourism or cultural tourism options. The high tourism density proposed by Disney conflicts with their corporate sustainability goals and is a recipe for degradation and overtourism at Lighthouse Point. Without significant modifications, it is likely that the activities outlined in the draft EIA could trigger intense ecological pressure with myriad negative impacts.</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment</p>

	<p>surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat.</p> <p>The comparison to this development being “consistent with an amusement park” is simply not true. This low-density development is comprised mainly of areas for guests to visit the beach, participate in cultural experiences and explore the site via clearly marked trails. It also is anticipated that guests will participate in tours that take them into Central and South Eleuthera.</p>
<p><b>Lack of Consideration of Alternative Options</b>  Upon review of the EIA and other documents, CREST noted only brief mention of Disney’s consideration of other alternative locations: “The Developer explored several alternative locations prior to purchasing the Lighthouse Point property. These locations included Egg Island, Eleuthera; Morgan’s Bluff, Andros; West End, Grand Bahama; and various parcels within the Berry Islands. These alternative site locations were rejected due to the potential for significant environmental impacts or operational constraints for cruise ships and other factors. The Lighthouse Point property met Developer needs with the least environmental impact, while providing access to deep water. The commitment to an open trestle pier/berth design allows access to deep water and eliminates the need for dredging, which is generally associated with a greater environmental impact.”</p>	<p>Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.</p> <p>Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.</p>
<p>Lighthouse Point is a fragile, nature-rich location, with proximity to a proposed marine protected area (MPA). However, LHP is now threatened by damaging impacts from mass tourism activities proposed in the EIA. CREST is concerned that DCL has not adequately explained the process, criteria, and overall results of the alternative location analysis. Consideration of alternative plans was an explicit requirement in the final draft of the 2020 EIA Regulations. We believe that Disney should be guided by global <b>best destination selection and management practices, and reexamine alternative</b></p>	<p>The report that proposed a new Marine Protected Area in South Eleuthera points out that the reef near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point, we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney has demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those</p>

**options including a more altered or degraded location, a land-based low impact option, and a no development option.** Best management practices are expected standard practice by an international brand of such high prestige as the Disney Company which, in turn, should guide DCL away from the mass tourism and amusement park approach proposed in the draft EIA.

that have been rehabilitated. Of those, reefs located near Abaco, where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that would result from the project and development. This includes the creation of at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, and ongoing training and professional development programs Disney has already committed to that are designed to build capacity and maximize opportunities for Bahamians.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.

	<p>In keeping with the environmental due diligence, DCL has continued to evolve the project's design. For example, surveys identified a number of protected trees and some cultural ruins in the northwest area of the property. As a result, the structures originally planned for that area have been relocated to the eastern side of the property. Additionally, when bird surveys identified a small wintering population of endangered piping plovers at a location along the southern shore of the property, the design was adjusted to avoid that area. Likewise, it was determined that the pier could be narrowed, reducing the potential impact on the marine environment by approximately 25 percent.</p>
<p><b>EIA Ignores the Impacts of Proposed Tourist Activities</b>  CREST has identified several negative impacts of concern, where in many cases, the draft EIA does not adequately acknowledge or even address them. These include: poor visitor dispersal; noise, water, and air pollution; habitat degradation (land and marine); toxicity to corals from sunscreen; stress on endemic flora and fauna (with several species IUCN rated threatened and endangered); resource overconsumption; high fossil fuel use for energy generation (70%); unknown waste management protocols; and an alarming dependence on waste burning/incineration. As outlined in the draft EIA, the undeveloped LHP area would be overwhelmed by tourists as cruise visitation explodes from the hundreds to the many hundreds of thousands of visitors per year. With perhaps 20,000 weekly visitors envisioned, the LHP project would have annual cruise visitation numbers comparable to pre-pandemic levels in Key West, Florida, and Costa Maya, Quintana Roo, Mexico. There is no established carrying capacity baseline for LHP and the draft EIA does not present the full picture of project impacts from design, construction, to proposed site operations (see below) nor the long-term impacts of climate change on the proposed project footprint and GHG contributions. Irreparable land and seascape transformation and overall environmental degradation is a real possibility both within the project footprint as well as in ecologically significant surrounding marine habitat. Disney should</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>We have also taken into account the increase in the water-based recreation in the vicinity of coral reefs. Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents.</p> <p>Additionally, the Environmental Management Plan will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>Disney has committed to develop and implement an education program that addresses Best Management Practices (BMPs) and protocols and will be</p>

<p>commit to the establishment and monitoring of carrying capacities and visitor density and distribution, with longer term planning providing a vision for site sustainability—a sufficient EIA would have considered these essential elements to sustainability and resource protection.</p>	<p>provided to guests, employees, vendors and others who operate recreational watercraft or provide excursions and other services. This is addressed in the EIA Section 7.2 - MARINE RESOURCES, and throughout the EIA.</p>
<p>The draft EIA ignores the negative environmental impacts of these tourist excursions on the environment, wildlife, and ecological integrity of LHP and the surrounding marine areas. Potential long-term negative impacts on marine mammals, corals, finfish populations, and overall ecological integrity of the marine environment are dismissed in the EIA with unsubstantiated claims that the project will have no impact on land or marine biodiversity. We particularly take exception to the March 10, 2021 DCL press notice that has the false and misleading headline, “EIA shows “no loss of biodiversity” expected for DCL’s proposed LHP Project.”</p>	<p>That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p>
<p>On-land impacts of nearly one million visitors per year is dismissed in the EIA as not having a negative effect on the environment or biodiversity. However, CREST anticipates that the extremely high visitor density on such a small and fragile area will result in significant negative impacts from human foot traffic, waste generation, water purification and consumption, energy generation and sunscreen usage toxic to corals. In addition, we are alarmed by watercraft excursion activities proposed in the draft EIA that present considerable risk to the ecology of LHP and surrounding areas.</p>	<ul style="list-style-type: none"> <li>• We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.</li> </ul>
<p>Personal Watercraft (PWCs): or “Jet Skis” is a proposed “thrill-seeker” activity that one would find in a high density, already degraded marine amusement park area, not a pristine, currently wild corner of the Bahamas. PWCs are a scourge on the environment, as they contaminate the water and air, create serious negative impacts on birds (nesting, feeding, and displacement), and can operate in shallow near-shore marine habitats that results in serious shoreline erosion, turbidity, and sedimentation problems in shallow</p>	<ul style="list-style-type: none"> <li>• Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.</li> <li>• We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We</li> </ul>

productive waters like those found at LHP. The EIA estimates that DCL will be at LHP for 3 to 5 days/week year-round, which if operating just 20 PWCs on-site, will translate to between 2,730 gallons and 4,550 gallons of gas and oil spilled in the inshore waters.<sup>9</sup> In this example, these same 20 PWCs would also emit smog/GHG into the currently clear air of LHP equivalent to the emissions of between 3,120 and 5,200 passenger cars each driven 100,000 miles.

will be looking for an appropriate community partner to assist in this effort.

- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.

Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment. The project will utilize sustainable design, building, and management practices that will conserve natural resources, while allowing limited use of the land. Sustainable design practices are reflected in the limited Project footprint, Disney-donated Public Lands, areas of extensive undisturbed vegetation, design of the open trestle pier, and other commitments detailed throughout the EIA. Additionally, Disney is currently studying the feasibility of implementing other technologies. This information is addressed in the EIA Section 6.3.3.2 – Air Resources.

Regarding personal watercrafts and other marine vessels potentially used as part of tours, these activities will largely be offered by Bahamian tour operators. Contracting for tour operators will not begin until approximately 18 months prior to operation and tour operators hired will be required to comply with all applicable laws and regulations, and adhere to all environmental guidelines and best practices.

Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.

While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.

We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:

- Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption
- Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding
- Electric golf carts to support operations
- Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution
- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our

	<p>emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.</p>
<p>Banana Boat Rides and Fishing Boats: the EIA does not specify the scale of thrill-seeking banana boat rides and fishing excursions for cruise passengers, but these activities will result in considerable negative impacts including: water, noise, and air pollution; potential reef disruption and damage; overfishing (bonefish, groupers, and snappers are all commercially important species in the area) and disruption to off-shore pelagic ecosystems as a result of tuna and other deep-sea trophy fishing.</p>	<p>Disney has committed to develop and implement an education program that addresses Best Management Practices (BMPs) and protocols and will be provided to guests, employees, vendors and others who operate recreational watercraft or provide excursions and other services. This is addressed in the EIA Section 7.2 - MARINE RESOURCES, and throughout the EIA.</p>
<p><b>Lack of Specifics on Economic Benefits</b>  Disney has shown considerable corporate interest in being a leader in sustainability. However, the draft EIA conflicts with this interest and does not consider sustainable tourism or community-based economic development. The EIA lacks any details that explain the economic benefits projections, and there is no way to determine what the actual economic benefits will be for local communities on Eleuthera, one of the most economically depressed areas of the Bahamas. CREST stands ready to work with Disney Cruise Lines to champion responsible tourism development at LHP and throughout the Caribbean leading to a responsible post-COVID recovery. CREST encourages DCL to lead by example and hold itself to a higher standard by providing a more transparent economic analysis and projections.</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full study is published in on the project website.</p> <p>Direct economic impacts are outlined in Disney’s Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> </ul>
<p>The draft EIA and other DCL documents state that the LHP project will generate an \$800 million increase in Bahamian GDP and a more than \$355 million increase in Bahamian government revenues over a 25-year period. Unfortunately, the EIA does not make the case for narrowing the wealth gap and improving the wellbeing and economic benefit of local communities. There is a genuine risk of economic leakage with most of the economic benefits received by others outside Eleuthera and</p>	

<p>The Bahamas. This is a significant problem with the cruise industry in general, and a key goal for a responsible recovery is to ensure fair and equitable economic benefits for local communities. CREST supports the recommendation to release the Oxford Economics Study results and the methodology used to produce these results so that all stakeholders can review the details and determine the validity of the claims of considerable community economic benefits.</p>	<ul style="list-style-type: none"> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products.</li> </ul>
<p>Finally, more detailed targets should be cited within the EIA that solidify the role of the local community within port operations. Similar targets that have been established in the construction process (overall ratio of 80 percent Bahamians) should also be created for ongoing employment in port operations, as well as for the other socio-economic commitments that do not currently establish concrete dimensions for success. Disney must also ensure that all port employees and local third-party vendors are subject to fair wages and just bargaining processes. Markers should be established to determine the ratio and revenues of duty-free shops and international brands to local shops and vendors in port, as to maximize benefits to the local economy and reduce economic leakage.</p>	<p>Direct economic impacts are outlined in Disney’s Heads of Agreement with The Bahamas, which can be found in Appendix I. Item G on page 3 specifically says: “The Government, being satisfied that completion of the Acquisition and the Project will be of significant economic benefit to The Bahamas and its people, has approved in principle the Acquisition and the Project...” Among the commitments outlined in the document, which were developed in collaboration with The Government of The Bahamas and the local community, are the following items:</p> <ul style="list-style-type: none"> <li>• Investing \$250 to \$400 million to create a destination in Eleuthera. This level of investment reflects Disney’s commitment to the environment and sustainable building practices.</li> <li>• Creating at least 120 construction jobs with an overall ratio of 80 percent Bahamians over the life of construction.</li> <li>• Creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. The current average wage at Castaway Cay is \$600-700 per week. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</li> <li>• Developing training and professional development programs to maximize opportunities for Bahamians.</li> <li>• Providing space for Bahamian vendors for the sale of authentic, high-quality Bahamian retail goods, services, souvenirs, arts and crafts and more.</li> <li>• Providing priority to Bahamian-owned and -operated tour operators.</li> <li>• Providing opportunities for Bahamian entertainers.</li> <li>• Purchasing some Bahamian agricultural and seafood products</li> </ul>

<p>It is not too late to support an enhanced level of cooperation amongst Disney, Bahamian government agencies, local communities, and NGOs for this project. At CREST, we encourage the redesign of this project that meets the new normal of sustainable tourism, more equitable economic benefits, and genuine destination stewardship. The world is watching, and the Disney Company has the opportunity, and responsibility, to develop a true, sustainable tourism destination model for cruise tourism.</p>	<p>We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans.</p>
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**EXPERT COMMENTS – DINAH BEAR (PG 38)**

<p>1. <i>Purpose of EIA:</i> This document suggests a fundamental misunderstanding of the purpose of EIA. The purpose is not to document the impacts of a decision that has already been made and suggest a bit of mitigation. Rather, the highest purpose of EIA is to evaluate the environmental and related social and economic impacts of a proposed action and alternatives to that action to inform decisionmaking. As it stands, the document does not conform to international and U.S. standards for EIA.</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well. DEPP oversees the public consultation process. DEPP will determine whether to accept the EIA and EMP and the Minister of the Environment will in due course decide whether to issue a Certificate of Environmental Clearance. None of these decisions have as yet been taken and the EIA does not prejudge them but is intended to inform them.</p>
<p>2. <i>Alternatives:</i> Everyone thinks about alternatives when they make personal decisions. And indeed, we are told that Disney considered alternative locations for this proposed project. But this isn't just a private decision – it's a public one that will affect the communities, wildlife and environment of this island for a long time, possibly centuries. The EIA needs to identify both site and project alternatives and analyze their impacts for public review and comment. Alternatives are a required part of EIA in many contexts, including implementation of international agreements to which the Bahamas is a party – The Convention on Biological Diversity and the Ramsar Convention on wetlands. And it's the Bahamian law!</p>	<p>Lighthouse Point has been privately owned for decades and Disney completed the purchase of the property in 2019. Disney Cruise Line also signed a Heads of Agreement with The Bahamas to develop a cruise port in 2019.</p> <p>Baseline data and impacts for the project are well documented in the EIA. A no-development alternative is accounted for through this baseline data. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.</p>

The report that proposed a new Marine Protected Area in South Eleuthera points out that the reef near Lighthouse Point have suffered from a reduction in live coral cover. It is anticipated that degradation of the marine environment will continue without intervention and Disney believes that with a permanent presence at Lighthouse Point we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives. Disney had demonstrated success with reef recovery strategies developed in collaboration with highly regarded conservation organizations. In fact, coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located around Abaco, where Disney's coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.

Furthermore, a no-development alternative would result in the loss of valuable and needed sustainable economic opportunities in South Eleuthera that would result from the project and development. This includes the creation of at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement, and ongoing training and professional development programs Disney has already committed to that are designed to build capacity and maximize opportunities for Bahamians.

The EIA does reference site alternatives and details may be found in the EIA Section 2.4 - SITE ALTERNATIVES. Prior to selecting Lighthouse Point for the new Project site, we researched several areas in The Bahamas within the cruising range of the vessels anticipated to use the new Project. Considerations were given to cruising distance from home port, cruising distance from the Port of Nassau, navigation depth requirements, minimization and avoidance of any dredging and development impacts, avoidance of areas of cultural resources, minimization of adverse sociological impacts and overall minimization of environmental impacts and other factors.

As part of the site selection process, we conducted a comprehensive site analysis for the Lighthouse Point site and determined that this site provided the

	<p>most desirable elements for the cruise ship destination, while having the least environmental impacts. Once Lighthouse Point was selected several pier, trestle and ship berth locations within the site were evaluated during the EIA and site planning process. The eastern portions of the site were rejected early in the process due to wind and wave exposure, depth restrictions, distance to deeper navigable water, and the presence of nearshore environmentally sensitive habitats. Anchoring offshore, with tendering passengers to the site was rejected due to safety concerns and the limited anchoring areas available that would not impact environmentally sensitive offshore habitats, and an open channel/landside berth design was rejected due to the required extent of dredging and associated environmental impacts. Disney has committed to an open-trestle pier design at Lighthouse Point that requires no dredging.</p> <p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.</p>
<p>3. <i>Scope of Analysis:</i> The preponderance of effects analysis and mitigation measures in this document focus on construction of the project. Those are important effects, but the longest lasting effects may well be from the presence of thousands of people recreating in the area and the necessary support systems, such as transportation, to keep the resort. That analysis is woefully lacking.</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guest will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment</p>

	<p>surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management.</p> <p>This will be further discussed in the Environmental Management Plan.</p>
<p>4. <i>Cumulative effects/climate</i>: To properly analyze such effects, the EIA should identify not only the environmental baseline and the effects of construction and operations of the proposed resort, but also analyze those impacts along with the synergistic effects of other actions occurring now and in the foreseeable future that will affect this part of Eluthera. An overwhelmingly significant aspect of such analysis must be related to climate change, including sea level rise – not just the impacts of the project on climate change, but very importantly here, the effects of climate change on affected resources, such as fish stocks, and on the project itself.</p>	<p>Disney has considered climate change as it relates to Lighthouse Point and the Project is not expected to have a material impact on climate change. Information can be found in the EIA Executive Summary, as well as Section 6.4, and information on related topics such as emissions and sea level rise can be found in Section 6.4.2.1 and Section 4.1.8. Sustainability planning has been part of the project at Lighthouse Point from the beginning, which will enable efficient design of the built environment and the use of renewable energy.</p> <p>Through the Heads of Agreement (HOA) with the Government of The Bahamas, Disney committed that a minimum of 30% of the energy supply to the Lighthouse Point operation would come from renewable sources. However, the most recent design for Lighthouse Point increases this substantially.</p> <p>While this will be further outlined in the Environmental Management Plan (EMP), we anticipate meeting 90% of our electricity needs with renewable energy sources and sending zero waste to landfill. We are also exploring waste to energy capture and will optimize water conservation.</p> <p>We are designing LHP with onsite solar panels and batteries to provide 90% of electricity needs. Remaining emissions are driven by refrigerants, as well as our energy needs from heating, cooking and a subset of our transport systems. There are back-up systems that require fossil fuels, like diesel generators, but those would only be used in cases where solar energy is not available for extended periods of time. Specifically, project initiatives include:</p> <ul style="list-style-type: none"> <li>• Solar panels (PV) and batteries sized to cover 90% of the estimated project electricity consumption</li> <li>• Centralized cooling of larger spaces to increase efficiency and support nighttime load shedding</li> <li>• Electric golf carts to support operations</li> <li>• Smart lighting solutions, with energy efficient fixtures designed to minimize light pollution</li> </ul>

- Optimized thermal systems to improve efficiency and align our energy usage with the availability of renewable electricity
- Building envelopes designed to reduce energy loss

The project will be zero waste to landfill. The goal is to minimize any waste that comes onto the site in the first place through systems like reusable dishware, hand dryers, and water bottle fill stations, among others. The primary waste generated will be organic waste, which will be treated with a biodigester. Modular construction techniques will also be used.

We are not withdrawing any water, and plan to make water on site using renewable electricity. We will have a water treatment system on site and will use properly treated reclaimed water wherever possible, including irrigation, wash-down, and flushing systems. We also will use low-flow water conserving fixtures in all restrooms.

We will continue to refine the performance of the operation and will install meters throughout the project to allow us to monitor and optimize our actual operational performance as we introduce guests to the new destination. Our emission mitigation strategy will also include investments in certified natural climate solutions (NCS) to balance any emissions that we cannot mitigate through the above strategies.

The project plans will be formulated to account for future impacts from climate change, including SLR. Using guidelines established by the U.S. Federal Emergency Management Agency's (FEMA) Coastal Construction Manual (CCM), the U.S. Army Corps of Engineers (USACE) Coastal Engineering Manual (CEM) and other International Standards, an appropriate Base Flood Elevation (BFE) will be established for all structures, including habitable buildings and the cruise ship pier. The established BFE will include predicted storm surge, still water levels and wave heights for the 50-, 100- and 500-year return periods, plus long range SLR values and an appropriate factor of safety established by International design standards. This practice is accepted and utilized in all coastal and maritime applications.

All onsite structures will be located at or above elevation 12 ft MSL. The design criteria for all onsite buildings per the American Society of Civil

	<p>Engineers codes (ASCE) is Exposure D, Risk Category II that will meet a wind speed of 175 mph or The Bahamian Code, whichever is higher. The Admin/Crew Pavilion that serves as an onsite “Hurricane Shelter” is designed to be Exposure D, Risk Category III that will meet a wind speed of 186 mph. Both the Risk Category II and III buildings noted above will meet Miami-Dade requirements, which are among the most robust codes in existence. Coastal landscape plantings will be native or regionally appropriate for use in stabilizing native dunes and shorelines.</p>
<p>5. <i>Missing baseline</i> data: The document reveals some very important gaps in baseline information – for example, do sea turtles nest on these beaches? What are the migration patterns of bonefish and how will they be affected? Are there coral reefs within the project footprint? How will the project likely affect island communities? The document has 3 paragraphs on surrounding communities that explain where the Bahamas and Eluthera are and the size of the human population. This is totally unsatisfactory. The EIA should include analysis of the likely impacts of the project on the culture and social structure of the island, as well as the economic effects.</p>	<p>Regarding biodiversity, field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species List and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.</p> <p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.</p> <p>Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.</p> <p>Disney’s planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using the globally recognized Atlantic and Gulf Rapid Reef Assessment (AGRRA), <u>coral reefs</u> do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre (0.145 acres) of <u>individual corals</u> could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted.</p>

A detailed analysis of benthic resources including corals within the footprint of the marine facilities has been completed in order to understand potential impacts, avoidance and minimization strategies, and conservation opportunities.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. This effort builds on Disney's success of coral transplants for conservation in the Abacos, which has demonstrated a 90 percent survivability of coral transplants over the last 13 years. A monitoring program will also be developed as part of the Environmental Management Plan, which is the second step in the two-step process outlined in Bahamian laws and regulations. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting fall 2021.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur

in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp.* *Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney, as previously mentioned, is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of

bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

As for other fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponge habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, work continues as part of our efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.

Disney Cruise Line ships will be utilizing shipping lanes used by other commercial ships, which includes passage over a sub-surface feature locally referred to as “the Bridge,” which extends between the tip of south Eleuthera and Little San Salvador. The depth to the top of the Bridge has been charted to be no shallower than 80 ft. of depth, which is well below the draft of the cruise ships operating in the area (27-ft draft). Figure 3-6 shows the vessel ingress to and egress from the site. Current and future fleet vessels are expected to berth at the site (EIA Section 3.1.4.3 – BOAT AND VESSEL TRAFFIC). Currently we do not believe this activity will significantly impact this area in context with the other ship traffic that uses the area.

	<p>All this being said, we will be monitoring 36 marine index sites in the area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management to address it.</p>
<p>6. <i>Secret studies</i>: Then there is analysis that apparently has been done but that has not been shared with the public. For example, Appendix H presents summary tables and charts of the economic study but not the study itself. Why not? Does the study address only beneficial impacts of the project?</p>	<p>An economic impact study conducted by Oxford Economics shows that over a 25-year time horizon, Disney’s project is conservatively expected to provide a more than \$800 million increase in Bahamian GDP. The full study is published on the project website.</p>
<p>7. <i>Superficial or no analysis</i>: The analysis of effects is quite superficial for a number of issues and focuses primarily on positive impacts. For example, for the proposed transformation of the road leading into the project area from a road that currently a road that will have the capacity to service more than 15,000 vehicles a day through dry, broadleaf evergreen forest, the analysis is “greater mobility”; not a word about the effects on the forest.</p>	<p>The direct and indirect impacts to the dry broadleaf evergreen forest are available in the EIA Section 6.1.1. Dry broadleaf evergreen forest covers nearly 50 percent of the property, or more than 470 acres. Development is expected to directly impact 39.2 acres of dry broadleaf evergreen forest. This estimate is on the high side as impacts may be less as notable features will be preserved and other species may be relocated prior to land clearing and used for vegetation. These impacts are mostly associated with the Back of House facilities, guest recreation areas and related site infrastructure, including primary and secondary circulation corridors (i.e., roads), the adventure camp, and the access road that is proposed to be constructed to provide access to the Disney Donated Public Lands parcel. Once paved the road will have the capacity to service more than 15,000 vehicles per day but as noted in the EIA we would utilize just a small fraction of this total capacity. Additional information on this may be found in the EIA Section 4.3.4 PROPOSED TRAFFIC / TRANSPORTATION INFRASTRUCTURE and Section 6.3.6.3 TRAFFIC / TRANSPORTATION (VESSEL / VEHICLE). Development will result in shifts in terrestrial species abundance and distribution, however because more than 80 percent of the property will remain in its existing condition, these shifts in species usage are unlikely to result in significant changes in the populations of individual species of birds or other animals.</p>
<p>8. <i>Mitigation suggestions</i>: The document promises much in the way of mitigation . . . much of it to be developed sometime in the future . . . and much of it presented as options, to be informed by an Environmental Management Plan (EMP) and adaptive management. But the document fails to provide for an adequate foundation for adaptive management and the purpose of an EMP by failing to provide adequate analysis to set responsible benchmarks. It</p>	<p>Section 7 of the EIA provides extensive information about proposed mitigation measures. These will also be further addressed in the Environmental Management Plan.</p>

<p>remains unclear what Disney is actually committing to in the way of mitigation and what the likely effects of the mitigation might be if implemented.</p>	
<p><b>Conclusion:</b> This is a very disappointing show by such an iconic American company that has long been identified with spotlighting nature. The Walt Disney Company has said that it would approach this project with the same level of environmental stewardship and sensitivity that it brings to other Disney projects around the world.” I can say with confidence that this document would never be published in the shape that it’s in right now in California, the birthplace of Disneyland and the Disney company.</p>	<p>We follow and have the utmost respect for the laws and regulations of the locations where we do business. The environmental regulatory framework of The Commonwealth of The Bahamas is governed by the Environmental Planning and Protection Act 2019 and the Environmental Impact Assessment Regulations 2020. The EIA was prepared in accordance with this framework, and the Environmental Management Plan, the second phase of this process, will be as well.</p>
<p><b>RECOMMENDATION:</b> A revised or supplemental EIA document informed by comments and expert analysis on this draft should be circulated for public review and comment.</p>	

**EXPERT COMMENTS – GLOBAL CORAL REEF ALLIANCE (PG 41)**

<p>Lighthouse Point has some of the least damaged coral reefs in the Bahamas and pristine salt ponds of global importance as migratory bird habitat (from EIA). Due to their location at the extreme southern end of Eleuthera, sticking out into clean ocean waters thousands of meters deep, these are the only coral reefs in Eleuthera that are entirely upcurrent from sources of land-based pollution, and therefore of the highest national conservation importance. Lighthouse Point sticks out into clean deep Atlantic water, and is up-current from all human influence because currents and waves approach mainly from the southeast.</p>	<p>The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included, among others, use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by AGRRA-certified biologists.</p> <p>Disney’s planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using transect technique including AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted. AGRRA surveys by independent groups were also performed on deeper reefs on the Atlantic side of Lighthouse Point in 2016 and 2018 to determine suitability of</p>
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	<p>an MPA and found a similar rating of “fair” with percent cover of live coral averaging &lt;6% across 11 sites.</p> <p>Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. Disney has substantial experience working with corals and reef systems in The Bahamas and has a 90% success rate in moving corals in the Abacos. We are using this knowledge to develop comprehensive coral programs to inform any adaptive management or reactive strategies that may be used at Lighthouse Point. A monitoring program will also be developed as part of the Environmental Management Plan. Monitoring will take place before development, during construction, and immediately after development, and on an ongoing basis to monitor for any construction-related and day-to-day impacts.</p> <p>Additional potential protective procedures and mitigation are identified in the EIA Section 7 - Proposed Mitigation Measures. These measures will also be discussed in greater detail in the Environmental Management Plan, the second step in this two-phase process outlined by Bahamian laws and regulations.</p>
<p>The EIA describes the health of Lighthouse Point coral reefs as “fair”, because live coral cover was about 1-10%, but the survey omitted all the areas of highest coral cover in deeper water on the east side of Lighthouse Point. Because of their exceptional water quality and lack of human disturbance, these reefs are likely among the most pristine reefs left in the Bahamas. Coral reef organisms may go to record depths there because of the clear water.</p>	<p>The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by AGRRA-certified biologists.</p> <p>AGRRA surveys by independent groups were also performed on deeper reefs on the Atlantic side of Lighthouse Point in 2016 and 2018 to determine suitability of an MPA and found a similar rating of “fair” with percent cover of live coral averaging &lt;6% across 11 sites.</p> <p>Benthic habitats on the east were include in the marine resources investigation as demonstrated in EIA Figure 4-27 and 4-29 where patch reefs are highlighted.</p>

<p>Lighthouse Point is certainly the major grouper spawning site in Eleuthera because it has all the features groupers look for: a promontory sticking out into deep water, exposed to waves, with currents flowing up both sides, allowing baby groupers to spread up both coasts. Whales and dolphins also pass by the Point. It is therefore of critical fisheries importance, although not identified as such in the national environmental protection plan. Lighthouse Point was designated for Protected Area status in the national Environmental Marine Protection Plan, but this recommendation has not been established or enforced.</p>	<p>The development as proposed at Lighthouse Point is compatible with the establishment of a multi-use Marine Protected Area (MPA). In fact, a Disney Conservation Fund grant helped support components of the work that led to the creation of The Bahamas Marine Protection Plan that recommended priority MPAs across The Bahamas. Over the past three years, we have vastly enhanced the scientific knowledge of Lighthouse Point and our marine facility plans have continued to evolve to intentionally avoid coral reefs. The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p>
<p>Lighthouse Point was designated a Proposed Marine Protected Area in the 2018 Bahamas Environmental Marine Protection Plan, for establishment by 2020. It has not yet been established or enforced.</p>	<p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas.</p> <p>Important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Independent scientists have studied the area and have not found aggregations off the point. Fishers report the nearest aggregation being halfway between Lighthouse Point and Little San Salvador. We recognize inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, work continues as part of our efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.</p>

<p>Because Lighthouse Point sticks out into the wind and waves, it is strongly exposed on both sides to hurricane waves there is only a narrow sand beach. Shore and offshore areas have hard limestone bottom with a thin shifting sand layer. During hurricanes some sand is thrown up on land, forming dunes, but most is washed out to deep water and lost. For this reason, there is not enough beach there to accommodate the number of tourists planned by the developers!</p>	<p>Disney has considered the number of guests that would be visiting Lighthouse Point on Disney ships and this will range from 11,400 to 26,600 per week, depending on the season. U.S. Army Corps of Engineers guidelines show the beaches at Lighthouse Point have an approximate capacity of well over 20,000 guests daily, which significantly exceeds the capacity of the passengers on the ship on any given day. Guests will only have access to designated areas within the Project site and guests will not be permitted access to sensitive areas or allowed to roam freely from paths and guest areas. Disney has extensive experience in managing guest flows and control at Disney Castaway Cay using wayfinding and these successful strategies will be implemented at Lighthouse Point. Additional information on this may be found in the EIA Section 3.1.4.3 BOAT AND VESSEL TRAFFIC.</p> <p>That said, Disney recognizes the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management. Disney is also monitoring 36 benthic marine index sites to monitor coral, benthic, and fish communities in the region to account for any changes that may be the result of the project.</p>
<p>Their solution is to import sand and dump it above the high tide mark to create artificial beaches on both sides of Lighthouse Point. There is not enough sand locally to dredge or pump to the site. They do not say where this sand will be brought from, nor whether it will be transported by barge or truck, and then spread by bulldozers.</p>	<p>The conceptual beach enhancements are based on locally observed conditions, discussions with local Eleutherans working with the field crew during the EIA site investigations and engineering analyses. The beach/swimming areas will be located where natural sand beaches currently occur along the south, southwest and southeast (north of the actual point) coasts. All these areas are relatively stable sand beach areas that naturally hold and accrete sand. To increase the beach usage area, guest beach areas will be expanded landward, and new sand will be placed on the upland where needed. The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes</p>

	<p>environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures, consisting of low-lying native rock and material, will be limited to upland areas only above the mean high-water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. This can be seen in the EIA Figure 3-1, the Lighthouse Point Illustrative Concept Plan. Depth of sand and other details will be site-specific pending completion of the design process. This will also be addressed in the Environmental Management Plan and through any other relevant Government permitting processes.</p>
<p>A unique feature of Lighthouse Point is the fact that all three of the severely endangered Acropora elkhorn and staghorn coral species are found together in very shallow nearshore waters, right in front of the proposed artificial beaches.</p>	<p>The EIA surveys documented occurrences of live Acroporids (Elkhorn, Staghorn, and Fused Staghorn coral) on the south side mainly near the LHP beach area (EIA Figure 4-25). Nearshore surveys have since been conducted along much of the East-side beach suggesting that none occur within 45 meters of the beach. All of these nearshore coral reef areas are identified as “sensitive” and were purposely avoided in the Site development plan. The closest Acroporid colonies are approximately 600 meters from the proposed trestle/development area. This is well outside the 25 m buffer area identified where secondary impacts from drilling and piling placement may occur. Individual live corals within these sensitive areas will be monitored as part of the 36-site monitoring marine monitoring network for any possible changes during construction or operation of the facility and adaptive management actions implemented to prevent or mitigate against any losses.</p>
<p>Location of shallow elkhorn and staghorn reef in front of proposed artificial beaches (+ symbols). From EIA, with red circles added to show how close they are to sand dumping for artificial beaches.</p>	<p>Coral surveys conducted by the Perry Institute for Marine Science over the past decade have found the only coral reefs in The Bahamas where populations of critically endangered staghorn and elkhorn coral have increased measurably are those that have been rehabilitated. Of those, reefs located near Abaco where Disney’s coral restoration efforts are focused, are leading all others in the scale of recovery as a standout example of reef recovery in The Bahamas. Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.</p>
<p>Elkhorn and staghorn corals used to be the most common corals in all clean shallow Bahamian coral reefs, but have almost vanished, and are very rarely now found together</p>	<p>The EIA surveys documented occurrences of live Acroporids (Elkhorn, Staghorn, and Fused Staghorn coral) on the south side mainly near the LHP beach area (EIA Figure 4-25). Nearshore surveys have since been conducted</p>

anywhere. These species provide the best shoreline protection from waves and the best fish habitat because they are the fastest growing Caribbean corals. These corals require the cleanest waters and good water movement by waves to survive, and are the first to disappear where waters become muddy from dredging and soil erosion, or polluted with nutrients. These species are especially vulnerable to sand from dredging. Once water quality deterioration kills these species, fisheries collapse and beaches wash away, a process far advanced in the developed islands of the Bahamas and Caribbean. In addition, they are especially vulnerable to coral diseases, and were the first species to be largely killed off by diseases throughout the entire Caribbean. Lighthouse Point is therefore of exceptionally high quality for the most endangered Bahamian reef building coral species, and deserves the strongest protection from any activities that would cause turbidity or nutrient inputs in coastal waters.

along much of the East-side beach suggesting that none occur within 45 meters of the beach. All of these nearshore coral reef areas are identified as “sensitive” and were purposely avoided in the Site development plan. The closest Acroporid colonies are approximately 600 meters from the proposed trestle/development area. This is well outside the 25 m buffer area identified where secondary impacts from drilling and piling placement may occur. Individual live corals within these sensitive areas will be monitored as part of the 36-site monitoring marine monitoring network for any possible changes during construction or operation of the facility and adaptive management actions implemented to prevent or mitigate against any losses.

At this time, we do not expect that there will be increases in nutrients and turbidity to these sensitive nearshore areas as a result of the LHP development and operation. Turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation, and this will be part of the Environmental Management Plan.

The report that proposes the MPAs points out that the reef near Lighthouse Point has suffered from a reduction in live coral cover consistent with our findings and Disney believes we have an opportunity to improve the marine environment through restoration and coral recovery efforts that will include the establishment of a long-term coral nursery and other initiatives.

Three planned activities are described in the EIA that would greatly damage water quality at this site: 1) nutrient discharge to coastal waters from sewage, 2) turbidity caused by boat docking, and 3) erosion of landfill beaches onto the reef. 1) A proposed waste water treatment plant is described, but almost no details are given. It is not clear if sewage will be treated to tertiary level to remove the nutrients, which if discharged into groundwater or surface waters will cause harmful algae blooms that will overgrow and kill corals and sea grasses, and choke migratory bird habitat with slimy weeds. The description of algae found on the reef make it clear that high nutrient-indicating fleshy algae are absent from the reefs, and the algae present are mostly coralline algae that produce white beach sand. Nutrient inputs will cause “bad” algae that produce no sand to overgrow and kill

Wastewater is addressed in the EIA Section 3.1.3.3 – Wastewater Collection, Treatment and Disposal. Currently, no public wastewater treatment facility is located or available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting requirements, and following all applicable laws and regulations, to provide treated water consistent with public access reuse requirements. The proposed system type under consideration is an extended aeration wastewater treatment process. The potential for energy recovery from wastewater treatment processes will also be explored.

The marine will be designed to allow sand to flow through and will prevent the buildup of fine particulates thus preventing turbidity issues from the small marina.

“good” sand producing algae. This stops new supplies of sand to make up for that which is lost to storms, while weedy algae – PAGE MISSING - Coral reefs killed by golf course fertilizers and sewage at Bakers Bay, Abaco. The same is true in New Providence and Grand Bahama

The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on all beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. The structures will be designed to keep sand contained in high use areas and only in areas exhibiting above normal erosion rates. They may also be used as guest barriers to prevent access into restricted areas. Nonetheless, we acknowledge that there may be some additional erosion of these enhanced beaches particularly during large storm events that may cause impacts to adjacent beach areas.

We will pay special attention to the southeast beaches (Lighthouse Point and Telescope beaches) where sensitive corals occur within 45 meters of the beach. These areas already have fairly high levels of sedimentation and sand movement, which limits live coral growth to elevated surfaces and reef edges. Sedimentation and coral conditions will be monitored on these and other inshore sensitive areas during construction and operation of the facility, Should sedimentation stress to sensitive inshore corals become apparent, management actions will be taken to mitigate against these impacts. Adaptive management actions may include removal of any accumulated sediments from nearshore corals following storms and other additional beach stabilization measures to minimize further erosion.

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat.

2) Disney Cruises use an innovative design that causes no dredging for cruise ship pier installation, because dredging has caused terrible damage to reefs at cruise ship destinations all across the Caribbean. However, the strong directional jets created during ship movements while docking and leaving port stir up sediment and leave clouds of fine-grained sediment to drift over coral reefs down-current. I advised the Turks and Caicos Island Government Department of Environment and Coastal Resources (DECR) national coral reef health assessment. We found corals on reefs kilometers down-current from the cruise ship pier on Grand Turk being killed by sediments suspended by propeller wash from cruise ships docking and leaving. Before the pier went in, that reef was the last good shallow snorkeling coral reef we could find in TCI with corals in healthy condition. DECR was forced to rescue and transplant thousands of corals that were being killed by sedimentation caused by cruise ships, and move them onto artificial reefs in clear water up-current from the pier. I have seen the same effects in Cozumel and other cruise ports around the Caribbean. Bahamian corals have had large scale mortality from repeated high temperature bleaching events, and are on the edge of survival from global warming. Warm water, heated by the engines from the directional jets on the cruise liners, will add additional stress to corals down-current. These engines must be on all the time while the cruise ship is at dock in case the wind suddenly shifts, as long familiar to Bahamian sailors! The EIA says thermal impacts will be small if there are good currents, but they could make the difference between life and death for corals under calm conditions. Impacts will be inevitable to reefs down-current from the dock to the north west of Lighthouse Point despite EIA claims there will be no effect

Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. The open-trestle pier berth design places the ship in approximately 35 ft waters and the majority of the sea floor below is hard bottom with a very thin layer of coarse sand over rock. This depth places the ship's propellers/thrusters propwash more than 20 feet above the sea floor. This depth and the horizontal direction of the propwash greatly limits if not eliminates any turbidity issues or disturbance of the sea floor by the wash. Even if the propwash would contact the sea floor, the sand surveyed beneath the berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions.

Moreover, Disney anticipates only minimal accumulation of fine sediments to the seafloor in the ship berthing area during the construction phase of the Project as there will be no dredging. While the expectation of turbidity related impacts to reefs are unlikely, turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.

The impact of ship cooling water discharge to corals and other marine resources in the LHP areas has been examined and is not thought to be significant for several reasons.

First, the overall volume of water discharged per hour is low in comparison to the volume of water displaced by the ship and will be quickly dispersed through mixing. The berthing area is strongly influenced by tidal currents measured between 1-1.5 knots, which will mix and disperse cooling water away from the berthing areas (either to the NW or SE as measured during the EIA). In a worse-case scenario of no tidal movement, the water around the ship would be temporarily heated by less than a degree during one hour during a slack tide before being dispersed. This temporary increase in water temperatures is not thought to be significant enough to disrupt corals that are directly within the berthing area footprint.

	<p>Second, discharged heated water will be less buoyant than the surrounding seawater and will likely float to the surface rather than sink where it would have the greatest impact to corals.</p> <p>Finally, the proposed berthing area contains primarily coral communities (e.g., hardbottoms) that are dominated by sponges with few Scleractinian corals that are documented to be most susceptible to heat stress. The nearest coral reefs are over a km away from the ship berthing area and are not located within the tidally dominated envelope around the berthing area. Nonetheless, water temperatures will be closely monitored as part of the management plan for the LHP site. An array of 12 high resolution temperature loggers is already in place and this network will continue to be utilized during and after construction to inform adaptive management measures. If localized thermal heating on sensitive coral habitats is found within the LHP area that is linked to the Berthing of the vessel or other operating influences than appropriate mitigation measures will be taken.</p>
<p>3) A major threat to the offshore reefs is being buried when the artificial beach created by sand dumping on the shore is washed into the sea by storm waves. Global sea level rise and increasing storm strength caused by global warming make this inevitable. These beaches are naturally narrow because of strong windward exposure orientated into the waves, the narrow shelf, hard flat limestone bottom, and fact that most of corals are in deep water at the edge of the drop off. A large amount of sand is produced by coralline algae, but most is washed away into deep water, so the area is generally starved of sand, with only a very thin veneer of mobile sand over hard limestone rock. Sand placed above the high tide mark will be unstable in the long run. Some will be washed onto the sand dunes by storm waves and wind, but eventually most will be washed into the sea and lost over the edge of the drop off into deep water. Corals between the shore and the reef edge will be buried and killed by eroded beach sand. Erosion of beach dredgefill sand dumped on South Florida beaches (called “beach renourishment”), killed all the inshore coral reefs that once lined the coast of Southeast Florida. If the goal is to keep the emplaced sand</p>	<p>The conceptual beach enhancements are based on locally observed conditions, discussions with local Eleutherans working with the field crew during the EIA site investigations and engineering analyses. The beach/swimming areas will be located where natural sand beaches currently occur along the south, southwest and southeast (north of the actual point) coasts. All these areas are relatively stable sand beach areas that naturally hold and accrete sand. To increase the beach usage area, guest beach areas will be expanded landward, and new sand will be placed on the upland where needed. The direct and indirect impacts to sand on beaches is addressed in the EIA Section 6.1.3 DIRECT AND INDIRECT IMPACTS TO SAND. Although no fill is proposed to be placed below the water line on the existing beaches, we acknowledge direct impacts on beach areas. Native sand will be placed above the water line where necessary to create a guest friendly beach with no hazards as outlined in our Heads of Agreement with the Government of The Bahamas. We will work with a vendor with valid Bahamian permits to obtain the sand in a way that aligns with all regulations in The Bahamas and minimizes environmental impact (e.g. not impacting seagrass beds). Coastal stabilization structures, consisting of low-lying native rock and material, will be limited to upland areas only above the mean high water line to contain the beach areas and minimize erosion. Beach expansion is planned landward of the foredune.</p>

<p>on the beach for cruise ship passengers, they will need to grow coral reefs to protect them from erosion, or make artificial ones. In South Florida all of the coral reefs that used to lie offshore and provided and protected the sand that built the natural beaches were smothered and killed when beaches were widened by sand dumping. Sand was washed offshore by the first storms. Since Florida lost both sand source and protection, they ever since have needed to dump more and more sand. The sand dumped never lasts out the year, and much is lost to deep water! Now no more dredge-able sand remains in South Florida, and they want to import it from the Bahamas. The same will happen at Lighthouse Point, where the artificial beach could be wiped out in the first hurricane or Norther, and kill all the shallow elkhorn and staghorn reefs in front of them, as happened to Florida in the 1970s.</p>	<p>The coastal stabilization structures will consist of low-lying native rock and materials, including vegetation and temporary sand fencing installed during storm events. The intent of the structures is to contain sand during times of extreme water levels from hurricanes and reduce wind-borne migration of sand. The structures will also delineate beach areas to keep guests out of non-swimming and protected areas. This can be seen in the EIA Figure 3-1, the Lighthouse Point Illustrative Concept Plan. Depth of sand and other details will be site-specific pending completion of the design process. This will also be addressed in the Environmental Management Plan and through any other relevant Government permitting processes.</p>
<p>Quite apart from the fact that the artificial beaches will damage the coral reefs when they are washed away, every cruise ship that enters or leaves the pier will send a cloud of suspended sediment over the corals down-current. The best remaining snorkeling reefs in the Turks and Caicos Islands were smothered kilometers downcurrent by dredging and cruise ship sediment plumes. This will also happen at Lighthouse Point. Grand Turk cruise ship pier. Coral reefs kilometers down current were smothered by sedimentation. Every cruise ship that enters and leaves sends a plume of mud onto the reef. The same will happen at Lighthouse Point, but the area affected will be larger than Grand Turk because the site is more exposed to longshore wave driven currents.</p>	<p>Disney's planned open-trestle pier design and small marina require no dredging and limit impacts to the sea floor. The open-trestle pier berth design places the ship in approximately 35 ft waters and the majority of the sea floor below is hard bottom with a very thin layer of coarse sand over rock. This depth places the ship's propellers/thrusters propwash more than 20 feet above the sea floor. This depth and the horizontal direction of the propwash greatly limits if not eliminates any turbidity issues or disturbance of the sea floor by the wash. Even if the propwash would contact the sea floor, the sand surveyed beneath the berth is coarse grained (composed of Halimeda skeletal fragments) and does not remain in suspension for long periods of time. As part of the EIA process, consultants used jet probes looking for sand depth and these simulation exercises never created turbid conditions.</p> <p>Moreover, Disney anticipates only minimal accumulation of fine sediments to the seafloor in the ship berthing area during the construction phase of the Project as there will be no dredging. While the expectation of turbidity related impacts to reefs are unlikely, turbidity and sedimentation will be monitored with protocols to minimize or prevent any issues during construction and operation. We will be monitoring 36 index sites in the region to account for any changes that may be the result of the project.</p>

<p>I congratulate authors of this EIA for the exceptionally complete job they made describing the site and the species found there, despite incomplete studies due to Covid. Their thorough descriptions allowed offshore ecological conditions of the site to be determined, even though missing from the analysis in the EIA itself, and even though they avoided looking at the best coral reef areas. For example, the EIA says that no reef fish spawning aggregation sites exist in the area that could be impacted, and that the nearest one documented is around 30 miles away, but this is probably because no detailed studies have been made there. Lighthouse Point is certainly a major breeding aggregation site for groupers and other fish, because what they look for is a submarine headland pointing out into deep water, and Lighthouse Point is probably the top grouper spawning site in Eleuthera for both coasts of the island.</p>	<p>Important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Independent scientists have studied the area and have not found aggregations off the point. Fishers report the nearest aggregation being halfway between Lighthouse Point and Little San Salvador. We recognize inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, work continues as part of our efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.</p>
<p>In conclusion this proposed development risks severe ecological damage to unique Bahamian coral reefs and fisheries of national conservation importance through sewage causing harmful algae blooms, turbidity caused by cruise ships, and erosion of artificial beach sand unprotected from storm waves. Both sides of Eleuthera will be affected if Eleuthera’s best reefs are damaged by this environmentally irresponsible proposal. Impacts of this project will damage both sides of Eleuthera.</p> <p>Please note I have received no money for review and comment on the 551 page EIA. My comments are motivated by what is best for Bahamian coral reefs and fisheries and not by any financial benefit such as received by the highly paid teams that produced this EIA.</p>	

**EXPERT COMMENTS – ANCELLINO DAVIS (PG 56)**

<p>Disney Cruise Lines have proposed a development at lighthouse Point in Eleuthera, The Bahamas. The proposed development has evolved significantly over the past few years and seen a major reduction in the acreage to be</p>	
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<p>developed and the amount of natural habitat to be impacted. This development is expected to bring many more guests to the island of Eleuthera than ever before, however, those guests will be prevented from interacting with the people and economies of Eleuthera by significant social, physical, technological and economic boundaries. Each of these barriers will be discussed in this review.</p>	
<p>The Lighthouse Point development will impact the environment in and near the development during the construction and set up phases through immediate catastrophic effects such as habitat removal, dredging and species introduction. Long term and cumulative effects on the site will also result from repeated and persistent introductions to the site such as human waste and food waste, insecticides and insect repellents and sunblock. There are gaps in the methodology used in the implementation of the Disney EIA and several of these gaps should be resolved before implementation of the project.</p>	<p>Disney has spent an unprecedented three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas, whose thoughtful feedback has enabled us to continue to evolve our plans. As we have said from the beginning, we will only move forward with a project at Lighthouse Point if we are able to do so in a way that aligns with our company’s deep and longstanding commitment to the environment. Our research over a three-year period, conducted by highly trained biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.</p> <p>We feel the need to clarify that many of the concerns raised appear to be directed more toward the Environmental Impact Assessment (EIA) process in The Bahamas, and not the degree to which our EIA fulfills the intended outcomes of the document. We believe, however, that many of these concerns will be addressed in the Environmental Management Plan (EMP), which will have more details about mitigation practices.</p> <p>Many of the concerns raised are broad-based opinions that are inconsistent with the facts we spent three years acquiring that are well documented in the EIA. Furthermore, many of the items you raise have been addressed extensively in the EIA, including waste, sunscreen, wastewater and more.</p> <p>Baseline data and impacts for the project are well documented in the EIA. Field investigations spanned 36 months in order to capture seasonal variations over multiple years (the first site visit was in October 2017 and environmental monitoring on the site continues). The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed</p>

during terrestrial assessments can be found in the EIA Appendix B – BASELINE LANDSIDE SPECIES LISTS and the full species list of all marine species observed can be found in the EIA Appendix C - BASELINE MARINE SPECIES LIST.

The marine resources investigation of the EIA consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint. Survey techniques included use of the globally recognized Atlantic Gulf Rapid Reef Assessments (AGRRA), which were performed by AGRRA-certified biologists.

Disney's planned open-trestle pier design and small marina require no dredging, limiting impacts to the sea floor. Based on surveys using AGRRA, coral reefs do not appear within the development footprint. Including 75-foot buffers on both sides of the pier and estimating on the high side, just over 1/10 of an acre of individual corals could be potentially impacted and will be mitigated. Nearby patch reefs –considered to be in “fair” condition based on AGRRA surveys – are outside of the project area by more than 500 to 1,000 feet and will not be directly impacted. AGRRA surveys by independent groups were also performed on deeper reefs on the Atlantic side of Lighthouse Point in 2016 and 2018 to determine suitability of a potential Marine Protected Area and found a similar rating of “fair” with percent cover of live coral averaging <6% across 11 sites.

Mitigation for hardbottom habitats directly impacted will focus on pre-construction transplanting of stony coral, which are of the highest value given the essential role they play in the hardbottom ecosystem. Disney has substantial experience working with corals and reef systems in The Bahamas and has a 90% success rate in moving corals in the Abacos. We are using this knowledge to develop comprehensive coral programs to inform any adaptive management or reactive strategies that may be used at Lighthouse Point. Additional potential protective procedures and mitigation are identified in the EIA Section 7 - PROPOSED MITIGATION MEASURES. These measures will also be discussed in greater detail in the Environmental Management Plan,

the second step in this two-phase process outlined by Bahamian laws and regulations.

Similarly, terrestrial field investigations began with a literature search and discussions with representatives from local organizations, followed by landside surveys. During the surveys, vegetative community types, as well as other land cover and land uses were characterized, and observations were made regarding the presence of birds and other animal species.

Field investigations started in October 2017 and monthly surveys continue to this date capturing several years of seasonal information including nesting migration seasons. All plant and animal species that were observed within the areas that are proposed for development are also present in the approximately 80% of the property where no construction is proposed.

That said, we recognize the importance of monitoring the environment and will continue to survey and use adaptive management strategies to address any adverse changes we may see in the terrestrial and marine environment surrounding Lighthouse Point. Disney is monitoring 36 benthic marine index sites in surrounding area to account for any changes that may be the result of the project. If there is a negative impact found, with the permission of The Bahamian government, we will use adaptive management including creating the appropriate habitat. Section 7 of the EIA provides extensive information about proposed mitigation measures. Further information will be provided in the Environmental Management Plan, the second step in this process as outlined in Bahamian laws and regulations.

Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company's overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In

2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.

- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas will be met regarding air quality control and monitoring. We are exploring waste to energy opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.

Wastewater is also addressed in the EIA and more information can be found in Section 3.1.3.3 – WASTEWATER COLLECTION, TREATMENT AND DISPOSAL. Currently, no public wastewater treatment facility is located or

	<p>available in proximity to Lighthouse Point. Wastewater generated on Lighthouse Point will be collected via a central sewer system and pumped to a Wastewater Treatment Plant that will be constructed in accordance with standard design and permitting requirements to provide treated water consistent with public access reuse requirements.</p> <p>Sunscreens containing oxybenzone and octinoxate will not be permitted at Lighthouse Point and Disney Cruise Line does not sell them. That said, the risk of impact due to sunscreen is minimal given that the beaches and coastlines at Lighthouse Point are well flushed by currents. Additionally, the EMP will address avoidance and minimization techniques to address potential marine ecology impacts that could arise from the increase in numbers of people that will experience the near-shore environment as recreational users (e.g., swimmers, snorkelers, beachcombers).</p> <p>There is always a delicate balance between sustainable economic development and protecting the natural environment and we believe the development as proposed at Lighthouse Point can accomplish both.</p>
<p>The site has been purchased by Disney already. The Project site includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas (2.1). The project site is 919 acres and includes 758 acres purchased by Disney</p>	
<p>The site is intended to serve Disney Cruise Lines Company which operates four ships registered in the Bahamas. Those ships are Disney Dream (4,000 pax), Disney Fantasy (4,000 pax), Disney Magic (2,700 pax), Disney Wonder (2,700 pax). The passengers include 1458 crew for Disney Dream and Fantasy and 945 crew for Disney Magic and Wonder.</p>	
<p>Social The Cultural landscape of the Bahamas and Eleuthera is vulnerable to disturbance and the people are subject to victimization as are people throughout the Caribbean. Specific attention must be paid to the effect on local communities and economies, and the representation of local people.</p>	<p>Disney spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans.</p> <p>Additionally, Disney has held information sessions and met with hundreds of</p>

	<p>potential employees, vendors, tour operators and other community members over the past two years to provide project updates, further build relationships and maximize opportunities for Eleuthera and the greater Bahamas and will continue to do so.</p> <p>A list of meetings is included in the EIA Section 13.</p> <p>And while social justice issues are not within the scope of the EIA, the Walt Disney Company is committed to diversity and inclusion and, given the events of the past year in the U.S., we have further strengthened this commitment.</p> <p>For Lighthouse Point specifically, Disney is already investing in the community and creating more opportunities for Bahamian ownership by helping entrepreneurs and small businesses prepare for participation in development projects underway in Central and South Eleuthera.</p> <p>As a starting point, Disney Cruise Line has teamed up with the Small Business Development Centre and Eleuthera Chamber of Commerce to provide more than \$1 million over three years to prepare businesses and entrepreneurs by providing business advisory services and training, as well as small business grants across a variety of businesses.</p> <p>Additionally, the design for Lighthouse Point will be inspired by the natural environment and celebrate the culture and spirit of The Bahamas. Disney has spent significant time with local artists and cultural experts in The Bahamas. Together, we have explored arts and cultural sites across New Providence and Eleuthera, from Junkanoo shacks to noted art galleries. Kevin Cooper, a master artist from Eleuthera and Antonius Robert, a master artist from Nassau, are anchoring Disney’s efforts as we work with local artists, historians and creatives in The Bahamas.</p>
<p>Restricted Access: Most of the debate surrounding Lighthouse point regards restricted access to the location for Bahamians, residents and non-Disney visitors. The EIA highlights positive benefits including job generation and pay scales for bahamians.</p>	<p>The HOA is clear on access for Bahamian residents and citizens for non-commercial purposes. The HOA in its entirety can be found in Appendix I of the EIA.</p>
<p>1. Clarity is needed on what types of jobs will be available to Bahamians. Will there be positions at multiple levels of the organization for Bahamians or</p>	<p>Through its Heads of Agreement with Government, Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include opportunities for training and development and cover a</p>

<p>will Bahamians be restricted to lower levels of the organization/mental labor positions such as cleaning, cooking, security or landscaping?</p>	<p>range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards, as well as management positions. A Bahamian currently holds the highest-ranking position at Castaway Cay and we are working toward 100% Bahamian employment there.</p>
<p>2. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment and represent income for immigration and potentially competition for local service providers, tour guides etc. Weekly passengers 11,400 to 26,600 is this accurate? Disambiguate passengers, clients, crew, or people total.</p>	<p>Weekly passenger estimates refer to guests and are not inclusive of crew.</p>
<p>3. How much time to conversion of all on island staff to Bahamians?</p>	<p>This is not within the scope of the EIA. However, is anticipated that all jobs on the site will be Bahamian, including supervisory roles. Through its Heads of Agreement with the Government of The Bahamas Disney has committed that at least 150 operations jobs will be created and available for Bahamians. Positions will include management positions and cover a range of disciplines including horticulture, transportation, security, maintenance, custodial, food and beverage, recreation/lifeguards and more. These roles will include opportunities for advancement, as well as competitive pay and benefits. Also, with guests expected to be in port 3-5 days per week year-round and the need to complete a variety of projects on non-port days, these jobs will provide much-needed employment stability. Further, we anticipate jobs will created by third parties who provide services to the operation and tours for guests, among other opportunities.</p>
<p>4. When the cruise ship is not in, there are only 2 people at Princess Cay. what about the other staff/employees? When in port how much of the on island work will be conducted by ship staff that come and work?</p>	<p>With guests expected to be in port 3-5 days per week year-round and the need to complete a variety of projects on non-port days, these jobs will provide much-needed employment stability.</p>

<p>Economic</p> <p>The Economic history and current climate of the Bahamas make the island of Eleuthera and the Bahamas on the whole vulnerable to exploitation from developers who have the money to encourage the country to accept unsustainable or unbalanced business offerings.</p> <p>1. Will these jobs be salaried monthly pay positions that are climate proof in the event of storms, or are they hourly wage jobs which will leave the employees vulnerable when storms or other events stop ship sailings?</p>	<p>Through its Heads of Agreement with the Government of The Bahamas, Disney has committed to creating sustainable economic opportunities for Bahamians, particularly in Eleuthera, and to strengthening the local community. Disney’s commitments include creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. With guests expected to be in port 3 to 5 days per week year-round and the need to complete a variety of projects on non-port days, the roles will provide much-needed employment stability.</p>
<p>2. Non-commercial access to the site means no Bahamian can engage in financial gain on the site unless employed by Disney. Does this include all the donated lands?</p>	<p>Approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands. The Developer will construct a roadway through the Disney Donated Public Lands, a parking lot, and beach amenities including restrooms, but the land will not be controlled by Disney. Further inquiries on permitted activities on the Donated Public Land should be directed to the Government of The Bahamas.</p>
<p>3. Can crown land in the area be sold and or restricted as such to a non bahamian entity?</p>	<p>Inquiries on use of Crown Lands are best directed to the Government of The Bahamas.</p>
<p>4. Does non-commercial access also mean that Disney will not have any forced costs for participation (security, parking, food vending, admission) for Bahamians and our guests?</p>	<p>Per our Heads of Agreement with the Government of The Bahamas, citizens and residents of The Bahamas will have access to the site for non-commercial purposes. There will not be fees charged by Disney Cruise Line associated with this access.</p>
<p>5. At Princess cays there is a notorious fence that locals are not allowed to cross when the cruise ships are not present and then, only those Bahamians with a special permit can cross into the property. Will Disney institute similar infrastructure?</p>	<p>Disney Cruise Line will provide all citizens and residents of The Bahamas with access to the property for non-commercial purposes, while working with the Government to ensure appropriate safety and port security. Additionally, approximately 190 acres of upland and the southernmost point of the property comprising approximately three acres (total of 193 acres) will form the Disney Donated Public Lands. Disney will construct a roadway through the Disney Donated Public Lands, a parking lot, and beach amenities including restrooms.</p>
<p>6. When ships are out of port, will staff be earning money?</p>	<p>Through its Heads of Agreement with the Government of The Bahamas, Disney has committed to creating economic opportunities for Bahamians, particularly in Eleuthera, and to strengthening the local community. Disney’s commitments include creating at least 150 well-paying operations jobs with benefits in a range of disciplines and with opportunities for advancement. With guests expected to be in port 3 to 5 days per week year-round and the need to</p>

	complete a variety of projects on non-port days, the roles will provide much-needed employment stability.
7. How do the weekly wages relate to guests per employee ratios?	This is not within the scope of the EIA.
8. How does this compare to local restaurants, hotels or other cruise ships?	This is not within the scope of the EIA.
20,000 guests per week for 52 weeks per year = 1,040,000 guests a year. 800,000,000 dollars over 25 years = approximately 32,000,000 yearly less than 32 dollars per guest for Disney lighthouse point guest.	
if the employees get 600 per week and there are 150 of them in construction and operational phases, that comes to 90,000 per week or 4,680,000 per year. so in wages, Bahamians get \$4.50 per guest on their island.	
Environmental The natural environment of the area is sensitive to disturbance and has a history of exploitation for economic gain. Resident and migrant bird species, fish, coral and other marine species use the area and are documented in various scientific and anecdotal reports.	
The site has been purchased by Disney already. It includes Lighthouse point, both the east and west shorelines and Crown Lands that include Big Pond, White Pond and other areas.	
1. The EIA disregards the cumulative impacts of adding the Disney cruise ships to the Carnival and Princess Cruise lines visitors that already use the area. These cumulative impacts will be much more severe than Disney describes and there is no carrying capacity of the environment discussed. Combined with the lack of waste management and waste export protocols, burning on the island and deep injection disposal of waste will affect the environment.	<p>This is not within the scope of the EIA.</p> <p>Disney can only speak to its proposed plan for development which strives to develop the site in an environmentally responsible way, create sustainable economic opportunities for Bahamians, celebrate Bahamian culture and further strengthen the community.</p> <p>Solid waste is addressed in EIA Section 3.1.3.6 - SOLID WASTE GENERATION AND DISPOSAL. Presently, there are no solid waste facilities at Lighthouse Point. Solid waste will be addressed more extensively in the Environmental Management Plan, which is the second step in this two-part process. That said, our goal is to achieve zero waste to landfill for this project. We look to achieve this in several ways:</p>

- We will seek to reduce initial waste created. For example, as part of The Walt Disney Company’s overall efforts to reduce the amount of single-use plastics, Disney Cruise Line has taken great measures to eliminate single-use plastics onboard and on Castaway Cay. In 2018, Disney Cruise Line eliminated the use of plastic straws, removing an annual volume of more than 14.7 million. Additionally, by switching to refillable bath product dispensers in all guest staterooms in 2019, Disney Cruise Line has removed an annual distribution of more than 2.2 million plastic amenity containers across its fleet – a total of 18 tons of plastic waste. Disney Cruise Line has also gone from annually distributing nearly 1 million plastic merchandise bags fleetwide annually to nearly zero. Other measures include the removal of plastic cutlery, stirrers and condiment packets.
- Recycling is a key component of our efforts and items that can be recycled will be returned to the ship for proper processing. Shipboard recycling processes have helped to eliminate on average more than 2,500 tons of metals, glass, plastic and paper from traditional waste streams each year.
- We have an opportunity to reuse some items and share excess, unused construction and other materials with the community. We will be looking for an appropriate community partner to assist in this effort.
- Specialized digesters for waste treatment
- Air hand dryers
- Water bottle fill stations
- Modular construction techniques

All other solid waste will be processed in compliance with Government regulations. Some non-hazardous waste that cannot be reused or recycled may be incinerated. The design of the incinerator will be in full compliance with either U.S. EPA in Table 1 to Subpart EEEE of CFR Part 60 or current IMO regulations, MEPC 224(66). All other requirements of the Government of The Bahamas, and applicable laws and regulations, will be met regarding air quality control and monitoring. We are exploring waste to energy

	opportunities, and also current and emerging technology that eliminates the need for incineration, or reduces the environmental impact thereof.
2. No Brazilian Pepper was mentioned in the area	Field investigations spanned 36 months in order to capture seasonal variations over multiple years; the first site visit was in October 2017 and environmental monitoring on the site continues. The survey for terrestrial ecology can be found in the EIA Section 4.2.1. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species. Brazilian Pepper was not observed in these surveys. If observed in future surveys, the EIA will be supplemented to reflect the updated species.
3. The Protected trees order is much larger now and the botanical survey should be updated to reflect that and the species there	Disney is aware that after the EIA was submitted to Government, Forestry (Declaration of Protected Trees) Order legislation has passed that expanded the list of protected tree species in The Bahamas. Disney has reviewed site transects and box plots to determine the species found in each habitat. The new list was added to the EIA as an addendum prior to final submission to the Department of Environmental Planning and Protection, and any necessary management and mitigation will be outlined in the Environmental Management Plan.
4. Though not specifically protected, endemic species have restricted distribution in the Bahamas and the region. There are other species as well that are of local and regional importance but are not necessarily listed in international treaties or local law. Our native and endemic species are more locally important for sustainable place based tourism. The surveys took place outside of their breeding season and were therefore biased toward winter migrant species.	<p>Terrestrial field investigations began with a literature search and discussions with representatives from local organizations, followed by landside surveys. During the surveys, vegetative community types, as well as other land cover and land uses were characterized, and observations were made regarding the presence of birds and other animal species.</p> <p>Field investigations started in October 2017 and monthly surveys continue to this date capturing several years of seasonal information including nesting and migration seasons.</p> <p>All plant and animal species that were observed within the areas that are proposed for development are also present in the approximately 80% of the property where no construction is proposed.</p>
5. The passenger numbers reported do not seem to include the crew. Crew members also produce waste and impact the environment. They also represent income for immigration and potentially competition for local service providers, tour guides etc. weekly passengers 11,400 to 26,600 is this	Weekly passenger estimates refer to guests and are not inclusive of crew.

<p>accurate? Disambiguate passengers, clients, crew, or people total.</p>	
<p><b>Mischaracterization of Habitat</b>  A Key element of the EIA is the characterization/classification of the habitat. In particular, Marine habitat includes areas characterized as “barren sands” in the Disney EIA. I have never seen barren sands in the Bahamas and open sandy areas include species such as flounder, bonefish, sharks, skates, rays. Sandy areas also serve as foraging sites for species such as dolphins who capture fish like rosy razorfish and eels. The sporadic nature and short duration of the surveys combined with the survey bias misrepresent the value and sensitivity of marine habitats. Biases are introduced when sandy areas are disregarded as barren or when surveys focus on coral based methodologies such as AGRRA.</p>	<p>Within this EIA, over 400 hours involved in underwater surveys including AGRRA and other survey techniques were performed inclusive of the sand environments. The survey for terrestrial ecology and marine resources can be found in the EIA Section 4.2.1 and Section 4.2.2 respectively. A full species list of all landside species observed during terrestrial assessments can be found in the EIA Appendix B – Baseline Landside Species List and the full species list of all marine species observed can be found in the EIA Appendix C - Baseline Marine Species List.</p>
<p>Discussions of Marine environment issues (4-89) included The Cape Eleuthera Institute, the Perry Institute for Marine Sciences and the Bahamas National Trust. These organizations all have considerable experience and investment in our marine resources. Additional consultations with the Bahamas Reef Environment Educational Foundation and the Bahamas Fisheries Association may have generated different results or improved the understanding of the resource.</p>	<p>We spent three years working hand-in-hand with a team of highly qualified and experienced scientists and other professionals on our Environmental Impact Assessment for Lighthouse Point (EIA). We also have engaged with numerous stakeholders throughout The Bahamas and beyond, including respected conservation organizations, whose thoughtful feedback has enabled us to continue to evolve our plans. A list of meetings is included in the EIA Section 13.</p>
<p>1. The EIA states that bonefish do not use the area based on personal Communication with one fisherman, and reference research that describes nurse shark mating areas and grouper spawning aggregations as being outside of the area of impact. Research bias limits the research of other groups to the area within their reach.</p>	<p>The marine resources investigation consisted of acquiring and analyzing high-resolution aerial photography and historical high resolution satellite imagery in Google Earth, a literature search, discussion of marine issues with representatives from local organizations and underwater surveys of marine areas around Lighthouse Point, including areas both within and outside the development footprint.</p> <p>Our research over a three-year period, conducted by highly trained marine biologists, has led us to conclude that the project can move forward with minimal environmental impact and no loss of biodiversity at a species level.</p>

While bonefish were not observed during more than 400 hours of underwater surveys for the EIA spanning different seasons, we expect bonefish may be present and have engaged Bonefish & Tarpon Trust to research this starting fall 2021.

The most suitable bonefish habitats in the Lighthouse Point area are thought to be shallow nearshore hardbottom, seagrass, and sand habitat types especially near headlands and within coves along the western and southern coasts. A total of 2.6 acres of these habitat types will be directly impacted by the development, with the proposed footprint of the small boat marina being the most significant. We understand that the actual influence of this footprint will be larger than the habitat directly impacted, but we don't anticipate the broader impacts will be widespread because of the construction and mitigation measures we will take to reduce sedimentation and other construction impacts.

We do not anticipate that juvenile *Albula vulpes* bonefish will be impacted by any activities at Lighthouse Point given our understanding that juvenile *A. vulpes* in The Bahamas prefer open sandy-mud bottoms in shallow, mangrove-lined bays with little wave energy (Haak et al. 2018, 2019), which do not occur in the Lighthouse Point area. It is possible that juvenile *A. goreensis* use the moderate-energy sandy shorelines, but since *A. vulpes* represents >99.1% of the recreational fishery in The Bahamas and >93% of the recreational fishery Caribbean-wide (other species collected as adults were *A. goreensis* and *A. sp.* *Cf. vulpes*: Wallace and Tringali. 2016), this should not have fishery and associated economic implications. In addition, available research suggests that juvenile bonefish don't undergo substantial spatial ontogenetic shifts (e.g., juveniles on the west side of Eleuthera remain in this area and juvenile bonefish on the east side of Eleuthera remain in that area: Murchie et al. 2019), thus a large resident adult population is unlikely established at Lighthouse Point.

Recent research on Eleuthera (Burruss 2018) identified apparent regionalization of connections between foraging areas (flats) and pre-spawning areas. This research indicated migrations between foraging areas and purported pre-spawning sites, all on a localized scale (e.g., 10km). No migrations were documented between the east and west sides of Eleuthera; more importantly, no migrations were documented between the eastern and western sides of

Lighthouse Point. In contrast, Burruss (2018) suggests that a bonefish pre-spawning site occurs near John Millars, approximately 7 miles north of the Lighthouse Point site, and found that all of the bonefish detected at this site were tagged in nearby foraging grounds.

Although the information reported by Danylchuk et al. (2011), Burruss (2018), Murchie et al. (2019) all indicate that bonefish do not migrate past Lighthouse Point and pre-spawning activity does not occur there, Disney is working with Bonefish & Tarpon Trust, which has applied for a permit to investigate potential bonefish use of the waters surrounding Lighthouse Point to validate this. If the additional research documents bonefish activity (migration, pre-spawning, resident population), appropriate mitigation measures will be taken. If you have additional information that would be helpful for the successful management of the area, we welcome the information.

Although bonefish migration through the Lighthouse Point area is not expected, if migration does occur, the greatest potential impact could be the possible interference with migratory pathways. If any evidence emerges of bonefish utilizing the area or migrating through the area, Disney will support the development of a targeted bonefish-specific conservation plan to minimize potential impacts to this species. In addition, fish-friendly measures such as fish migration thruways will be incorporated into the design of proposed in-water structures to facilitate/reduce impedance to their migration movement through the area. In addition, if research indicates greater use of the Lighthouse Point area by bonefish, the Lighthouse Point Environmental Management Plan will include measures to reduce potential impacts to bonefish from guests utilizing the nearshore areas during bonefish migration periods.

Regarding fisheries, important commercial and recreational grouper and snapper were seen utilizing habitats that will be affected by development at Lighthouse Point. Inshore hardbottom habitats are important for juvenile stages of several reef fish, while the higher relief hardbottom with coral mounds and sponges habitats provide shelter for adults. Disney is exploring opportunities to build underwater structures in concert with open habitat in ways that will be valuable to fish populations and help to offset any adverse impacts. Beyond our on-site strategies, our work continues as part of our

	<p>efforts through Disney Conservation to advance conservation and support local Bahamian-led solutions across the region. For instance, educational programs to promote sustainable fishing practices and improve overall management practices among others are already being supported by Disney in The Bahamas and will be extended to Eleuthera as part of our longer-term conservation efforts in the region.</p>

**10.0 ATTACHMENT G: OPINION/COMMENTS RECEIVED THROUGH  
LIGHTHOUSE POINT WEBSITE, DCL BAHAMAS EMAIL AND DEPP EMAIL**

**10.1 ATTACHMENT G1: OPINION/COMMENTS RECEIVED THROUGH  
LIGHTHOUSE POINT WEBSITE**

All inquiries received through the Lighthouse Point website were deemed as questions and responded to by the developer. These responses can be located in Section 7.0 – Attachment D: Questions Received through Lighthouse Point Website.

**10.2 ATTACHMENT G2: OPINION/COMMENTS RECEIVED THROUGH DCL  
BAHAMAS EMAIL**

On 4/16/21, 10:17 PM, "Jamie Johnson" <[andy\\_jamie99@icloud.com](mailto:andy_jamie99@icloud.com)> wrote:

Leave Eleuthera alone! We've gone to Eleuthera for years and enjoy Lighthouse Beach the most. It's a place our family has loved to make memories at. We go there to get away from people not to be ruined by a cruise line and all the people getting off the ship there. Let those of us who actually love Eleuthera for its beauty & quiet to continue to keep coming back like thousands of us have been doing for years and enjoy it! You have plenty of places to dock and an island to call your own. Quit ruining every beautiful place!

For the love of Eleuthera and the planet leave it alone!

Sent from my iPhone

On 3/26/21, 9:32 AM, "Holly" <[holly2525@sbcglobal.net](mailto:holly2525@sbcglobal.net)> wrote:

No one wants you in Eleuthera. You would be best served by selling the property to the One Eleuthera. You have other properties. The cruise industry is suffering and will not come back for years. You are not going to get your return on investment. Cut your losses and leave. The opponents of Lighthouse Point will continue to dog you forever. It is a group of people that will watch you. Please leave.

Sincerely,

Holly Lown Waters

Sent from my iPad

**From:** Denise Chaplin <[denisechaplin12@gmail.com](mailto:denisechaplin12@gmail.com)>

**Date:** Tuesday, March 9, 2021 at 10:26 AM

**To:** DCL Bahamas <[DCL.Bahamas@Disney.com](mailto:DCL.Bahamas@Disney.com)>

**Subject:** Environmental Disaster

Disney.

You already know what a environmental catastrophe building your unnecessary port will be for the Bahamas.

Lighthouse Beach is the most pristine, beautiful beach in the world. It breaks my heart and breaks the hearts of thousands of others, you plan on destroying this beautiful beach. Your plans are ugly and disgusting. How can you be proud of destroying such a special place? Your ships dump garbage into the ocean. You know this but do nothing.

I will boycott everything Disney. You are a complete disappointment and set a terrible example for children all over the world.

**PRESERVE DON'T DESTROY!**

A concerned citizen

On 4/6/21, 2:54 PM, "Tod Hagan" <[tod.hagan@gmail.com](mailto:tod.hagan@gmail.com)> wrote:

A cruise destination at Lighthouse Point is a terrible idea. Please don't put greed before the environment

Sent from my iPhone

**From:** Richard Switzer <[conchfish95@gmail.com](mailto:conchfish95@gmail.com)>  
**Date:** Thursday, April 1, 2021 at 9:14 AM  
**To:** DCL Bahamas <[DCL.Bahamas@Disney.com](mailto:DCL.Bahamas@Disney.com)>  
**Subject:** Protect us?

Whose going to save us from YOU?

**10.3 ATTACHMENT G3: OPINION/COMMENTS RECEIVED THROUGH DEPP  
EMAIL**

**From:** Tanya Melich [<mailto:tanyamelich@hotmail.com>]

**Sent:** Thursday, April 8, 2021 8:33 PM

**To:** DEPP Inquiries

**Subject:** Lighthouse Point

To whom it may concern:

I am writing to you today to implore you to do the right thing and step away from developing your cruise port at Lighthouse Point.

This is a magical part of our heritage and our country and you will be destroying something that we will never get back.

Over 450,000 people have signed the petition to stop you and disagree with what your company is doing.

This part of Eleuthera is the # 1 visited place for visitors on the island and people are appalled by the plans Disney has.

Please stay away from our country Mickey and show the world you really do care about the world and not just the \$'s !!

**Tanya Melich Crone**

Governor's Harbour

Eleuthera

The Bahamas

[tanyamelich@hotmail.com](mailto:tanyamelich@hotmail.com)

Tel: 1 242 362 4136

Cell: 1 242 376 0323

-----Original Message-----

From: Kristel Kingston <[kristelsea@yahoo.com](mailto:kristelsea@yahoo.com)>

Sent: Tuesday, 6 April 2021 11:17 am

To: DEPP Inquiries <[inquiries@depp.gov.bs](mailto:inquiries@depp.gov.bs)>

Subject: Regarding Lighthouse Point, Eleuthera

Good day,

I would like to express my concern for The Bahamas allowing Lighthouse Point, Eleuthera to become a cruise ship port. I feel this is very short sighted and not in the best interests of The Bahamas or of Bahamians.

I live in Eleuthera and my Bahamian husband and I own a tour business. I am very familiar with Lighthouse Point, tourism, and the cruise ship industry. In fact, we even do tours for Princess Cays guests out to Lighthouse.

The future of the world, travel, tourism, and general living is in ENVIRONMENTAL CONSERVATION and ECOTOURISM. Countries like Costa Rica, New Zealand, the Galapagos... have become booming successes with going full throttle with Ecotourism. Can you imagine completely changing the marketing of the Bahamas and "selling" it as a top Ecotourism Destination? The Bahamas is so much more conveniently accessible to travelers than some of these other countries. With a tourism overhaul in the correct direction, The Bahamas could rebrand itself and become uber-successful.

Not only is allowing a cruise ship port at Lighthouse Point detrimental to the future of the environment, but you are really being fed a line of bs regarding Disney's interest in providing jobs for locals. Yes, some jobs will be created. But nothing on the scale of what could be created if Lighthouse Point were made into a national park and developed with eco-lodges, tours, and locally owned shops. Really, honestly look at this from Disney's viewpoint. This is their potential to make their stocks leap, provide bonuses for their executives, and expand their brand even further. They are not here to make the Bahamas successful. They are a business, and one who has been doing this for a long time, and their interest is in themselves and their shareholders.

I have done a lot of research on Disney (and other cruise lines) and their work ethics in foreign lands. They are going to do things you haven't even thought of yet. Did you know that when building Disney Hong Kong, they secretly removed boulders from a river miles away. After removing these boulders the fish had no where to hide and were washed out to sea. Three fishing villages had to relocate because of this. Who would ever have thought to tell Disney, "no you can't remove boulders from a river miles away"? (Reference

<https://nam04.safelinks.protection.outlook.com/?url=https%3A%2F%2Fstudyhippo.com%2Fdisney-environmental-impacts-hong-kong%2F&data=04%7C01%7CMeghann.E.Morris%40disney.com%7C1e3c311a36414429c25708d8f94fb727%7C56b731a8a2ac4c32bf6b616810e913c6%7C1%7C0%7C637533468049176070%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=ebnj5%2BbdULEh3iMrfsGJtyYxfxl6nysTCviZeOlK6c0%3D&reserved=0>

I had mentioned earlier that we do tours for Princess Cays visitors. We don't work for Princess Cays as they wanted 80% of our tour price. This is industry standard. Disney claims they won't ask for a percentage, but when I went to their meeting, their slides regarding this showed they were "taking bids"

for tours. This means they will only allow you to work for them if your bid is low enough (i.e. you offer to do the tour for 20% so they can mark it up 80%). This is a round about way for them to still get what THEY want. Did you also know that when they were hiring people for Castaway Cay to do simple tasks like servers, they'd throw a requirement in that you had to speak Portuguese (because they had a lot of Portuguese guests), or something else that Bahamians could not do. Then when they could not get the workers from the local population, because they couldn't meet all the requirements, they were able to say they tried to fill the slots but couldn't. And they could take their idle crew members, who they were already paying, and make them work ashore.

I am part of the new Global Sustainable Tourism Council for Eleuthera. This is a GLOBAL council. The Bahamas has started moving in the right direction by joining this. I am not anti development, I am not anti cruise ship. I am pro-Environment and pro-Bahamas. I know that Lighthouse will be developed to some extent eventually, and I honestly feel it can be done smartly and very successfully. Please reconsider the future of this amazing spot and honestly, the future for all The Bahamas.

Have you actually been to Lighthouse? This is not just another beautiful beach. The complete landscape from the cliffs, to the pink sand, to the turquoise waters is MAGICAL, it's almost a religious experience. You really MUST experience it for yourselves before just allowing a cruise ship port to forever change it. I would like to offer to carry you out there myself so you can see it. Please consider this before the final go-ahead is given. Please.

Kindest Regards,  
Kristel Anderson  
Deep Creek, Eleuthera  
242-557-7381

-----Original Message-----

From: TheBklynmermaid [<mailto:bklynmermaid@gmail.com>]

Sent: Saturday, April 10, 2021 7:30 PM

To: DEPP Inquiries

Subject: Lighthouse project

To whom it may concern

No matter how many times Disney says it, there is no way to build any kind of docking structure for the size boats they are planning to have dock at Lighthouse Point without major environmental damage.

Talk to anyone not on their payroll.

No matter how many times Disney says it, there is no way That the number of people Disney is planing to bring to Lighthouse Point, wearing the amount of coral-killing suntan lotion that they are going to wear will not cause major damage to the coral and the sea life and the waters at Lighthouse Point.

No matter how many times Disney says it, there is no way That bringing all those people to an artificially created "beach" and only letting them shop at vendors who pay Disney fees for the privilege of selling their wares to visitors on their own island will be of any significant economic benefit to the people of Eleuthera.

Why in the world would Disney think it is necessary to change one of the most beautiful, untouched natural wonders in order to bring people to it. As it is, Lighthouse Point is the biggest tourist attraction on Eleuthera. And Eleuthera is the tourist attraction that it is precisely because it is NOT "Disneyfied."

No one would allow this kind of damage to a place like the Grand Canyon? Why should we allow it here? For the love of the earth and the oceans and the fish and the coral in the sea and natural beauty that is the magic of Eleuthera do not do this!

Patricia Sener

**From:** Tamie Herr [<mailto:tamieherr@gmail.com>]

**Sent:** Saturday, April 10, 2021 10:22 AM

**To:** DEPP Inquiries

**Subject:** Lighthouse Point Eleuthera

To Whom It May Concern,

We have been vacationing on Eleuthera since 2005. We were honored when an Eleutheran told us we were no longer visitors, but we were home. I would never be presumptuous to believe I have more say than a Bahamian in what becomes of Lighthouse Point, but this is my opinion. The settlements in the South will not profit from Disney developing Lighthouse Point, Disney will profit, while a truly magical place loses! I don't understand how anyone that has ever stood on the limestone cliff at Eleuthera's southern tip, believes Disney will not have an impact on its environment. The captivating reefs that we snorkel will be killed, the solitude of a beach walk to the north (Atlantic side) will be replaced with beach chairs for your hundred+ closest friends, and a T-shirt shack where you can buy a mouse ear hat made in China will be erected. I don't know what the solution for the poverty of Greencastle, Millars, or Bannerman Town, and other settlements but I know it is not Disney! Since we learned of Disney's plan to "develop" Lighthouse Point, we have boycotted all things Disney. I know it has little to no impact on the Disney Corporation, but I want no part of destroying a very unique, spiritual spot on our planet! I will not spend one dime supporting this project! Here's an afterthought, if Disney is so altruistic, why not move the development to the area south of Arvida Bay and give the land back to the Eleutherans?

Sincerely,  
Tamie Herr

Sent from my iPad

**From:** Tod Hagan [<mailto:tod.hagan@gmail.com>]

**Sent:** Friday, April 09, 2021 11:00 AM

**To:** DEPP Inquiries

**Subject:** Disney's Lighthouse Point Project

Dear Sir/Madam -

Thank you for accepting public comment regarding Disney's Lighthouse Point Project on Eleuthera. For the past 25 years, I have worked professionally as a researcher on a variety of subject matter and for many government and commercial organizations. My research has been accepted and presented at the international level including NATO Science and Technology Symposium and Conferences. With this experience comes the ability to discern a good study from a poor study. The EIA is not based on sound research methods and practices nor would it ever be accepted by any scientific community of practice. I say this with complete and unwavering confidence.

For Disney's EIA to have any validity, it must be peer reviewed by a third party organization with expertise in the subject matter. The consultants Disney used to inform the study are paid by Disney and clearly biased to either greatly minimize impacts or blatantly disregard them. Another point of concern from the Zoom meeting on April 8th, 2021, it is clear the study is incomplete and inaccurate. Disney has not completed the design of the project, therefore an EIA cannot be accurate. After years of study, Disney claims no bonefish are in the area. This is extremely disturbing and calls into question other claims regarding flora, fauna, coral reef, invertebrates and other finfish populations. These items alone underscore the requirement for independent EIA review by qualified individuals.

A project of this magnitude and in such an environmentally sensitive area with the potential to cause irreversible damage deserves better. As a global community, we can do better, we must do better.

I'm very happy to discuss the details, characteristics and merits of a sound scientific study.

Very Respectfully,  
Tod Hagan