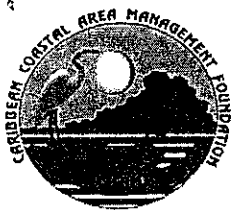


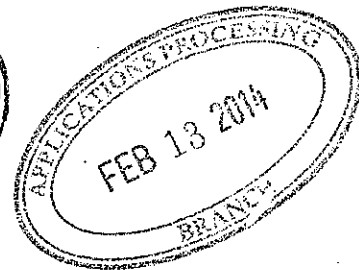
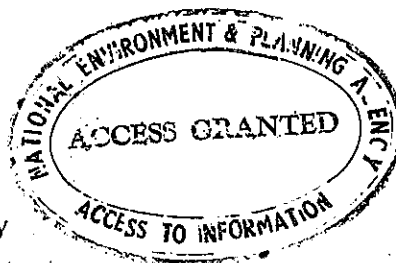
04 MAR 2014



CARIBBEAN COASTAL AREA MANAGEMENT (C-CAM) FOUNDATION
P.O. Box 33, Lionel Town, Clarendon, JAMAICA
Telephone: (876) 986-3344, 986-3327, 289-8253 Fax: (876) 986-3956
E-mail: ccamfngo@gmail.com
Website: www.ccam.org.jm

February 13, 2014

Mr. Peter Knight
CEO
National Environment & Planning Agency
10 Caledonia Avenue
Kingston



Dear Mr. Knight,

Comments on "Implementation plan of engineering study for the first-stage container terminal project in Portland Bight Port, Jamaica"

The C-CAM team wishes to note that the document is the first time we have seen anything resembling plans for the port. We note that they are worse than we expected in that they do not seem to take any of the environmental threats or vulnerabilities into account. We have provided some preliminary comments on the plans (see below), with the qualification that these are not to be taken as representing our detailed position on the proposed development.

The boreholes themselves seem to be fairly routine, and if properly monitored, should not be a major threat to the area. However the implications of their location are a much bigger issue and one that is beyond the scope of this letter.

As always thanks for including us in this process as we work together for the sustainable development of Portland Bight.

Yours sincerely

Miss Ingrid Parchment
Executive Director
876-383-2184
iparchment@yahoo.com

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Mrs. Maxine Whittingham Osbourne, Mr. Krishna Desai

received by via
email 13/2/2014.

General comments on design and location of the port

1. We note that the site proposed for the port is part of the Portland Bight Protected Area and part of the Portland Bight Wetlands and Cays Ramsar Site. It includes Amity Hall and Goat Islands and Cabaritta Point Game Sanctuaries, and the Galleon Harbour Fish Sanctuary. These areas have previously been zoned for wetland conservation and sustainable tourism. No previous national or local plans have ever identified them as a suitable location for port development. We would like to state that the location of an international port of this type in the site in the centre of the protected area would have implications that could affect a wide area even if the project were designed, built and operated to the highest international standards. The process to date and the track record of the development do not lead us to be optimistic about the commitment of the government or CHEC to minimizing environmental damage.

The site appears unsuitable because of its ecological sensitivity as well as its vulnerability to natural disasters. In our opinion, alternative sites should be seriously considered before the decision is taken to locate a port in this area.

If, based on an informed and detailed study, a decision is taken that this is in the national interest, then the design of the site should be adjusted to minimize the damage to the site. Please note that we are expecting to receive funding to support the Conservation Strategy Fund (an organization with extensive experience of assessing conservation and economic implications of large infrastructure projects) to carry out an independent assessment of options for this port development.

The design shown in Figure 1.2 does not suggest that any effort has been made to minimize environmental damage or protect the most vulnerable areas.

A complete discussion of the impacts and implications of the proposed development is beyond the scope of this document, but in particular we note that:

- a. The area indicated for the turning circle is one of the best remaining shallow areas of patch reef remaining in the Portland Bight Protected Area. If the plan goes ahead in this area it would be necessary to relocate the corals, to another suitable site, which would be hard to find.
- b. The same area including the Careening Island Reef forms one of the optimum areas for marine mollusks in the island as indicated by the abundance and diversity of new shells being deposited on the shoreline of south western Little Goat Island.
- c. The causeway, bridge and road proposed to join the Goat Islands to the mainland potentially disrupt water circulation in the Galleon Harbour, (which is one of the most important fish nurseries on the south coast) and could therefore have long-term implications for fish populations in the PBPA and possibly a wider area. They also provide habitat for several threatened and endangered species. These functions cannot be relocated. The Amity Hall and Deanery wetlands are some of the most important areas for wildlife. It is very important that if it is planned to put roads

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through these areas they are designed so that water circulation can be maintained. The Salt Island Creek and Salt Island lagoon should not be disturbed.

- d. We are very concerned that the present design of the waterfront for the port is very vulnerable to storm surge and wave action. The removal of the reefs and shallow areas and the dredging of the channel will exacerbate this problem.

2. Specific comments

It is difficult from the maps to assess the precise locations of the boreholes and their relationships to ecosystems. However they are in or near some very vulnerable areas of reef, mangroves and sea grass. It is therefore very important that environmental and industrial safeguards are followed. We are not familiar with the safeguards that are mentioned in the document so we cannot assess whether they are adequate. We would like to know what procedures will be in place to monitor their compliance with the standards and who will be responsible for monitoring the process.

- CRPS coordinates
president.



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Mrs. Maxine Whittingham Osbourne, Mr. Krishna Desai



MINISTRY OF SCIENCE, TECHNOLOGY, ENERGY AND MINING



MINES AND GEOLOGY DIVISION

HOPE GARDENS

P.O. BOX 141

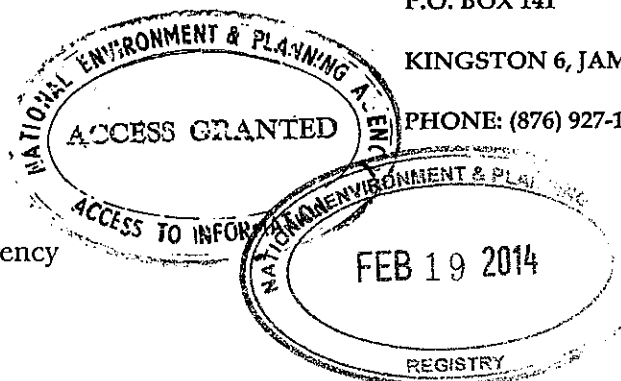
KINGSTON 6, JAMAICA, W.I.

PHONE: (876) 927-1936-40

ANY REPLY OR SUBSEQUENT REFERENCE TO THIS COMMUNICATION SHOULD BE ADDRESSED TO THE COMMISSIONER OF MINES NOT TO ANY OFFICER BY NAME AND THE FOLLOWING REFERENCE QUOTED:-

February 14, 2014

The Chief Executive Officer
National Environment & Planning Agency
10-11 Caledonia Avenue
Kingston 5.



Attention: Ms. Charlene Roye

Re: Implementation Plan for Geotechnical Investigation - First Container Terminal Project in Portland Bight Port (Goat Island) Jamaica.

The Mines and Geology Division (MGD) was requested by the National Environment and Planning Agency (NEPA) to review the Implementation Plan for the geotechnical investigation of Goat Island in the Portland Bight area. In principle, the MGD is satisfied that the technical aspects of the geotechnical programme have been adequately covered in most cases. We however, would like to make a few comments and suggestions where improvement in the investigation can be considered.

1. Section 2.4.2. Borehole Depth

This section provides information on the depth(s) to which samples will be taken and proposed sampling intervals to be used based on the type of rock and soil. We note that in highly weathered rock, sampling would be done at 6m intervals. We are concerned that the sample intervals in the highly weathered rock are much greater in the moderately weathered or more stable rock. We would assume that the frequency of sampling would be higher in less favourable geotechnical material.

2. Rock Mass Quality

It is also noted that some attention has been given to rock weathering as an important parameter in the description of the core samples. However, measurements of Rock Quality Description (RQD) or Solid Core Recovery (SCR) have not been stated as part of the geotechnical programme and it was felt that this may be an oversight. RQD and SCR are important parameters for the quality of the rock, which in our opinion should be included as part of the geotechnical investigation.

20140555

3. Detailed Geotechnical Investigation

It is assumed that more detailed geotechnical investigation will be conducted in areas where critical engineering structures will be sited and where the site(s) selected shows variable geotechnical properties which may have an impact on the behaviour of these structures.

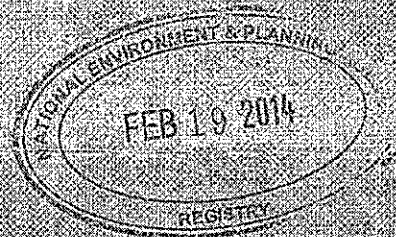
Conclusion

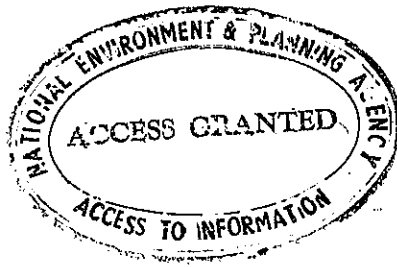
The MGD is satisfied with the proposed implementation plan, but asks that the consultants consider a review of the sample intervals for moderately weathered and highly weathered rock as well as the inclusion of RQD and SCR as important geotechnical parameters for the determination of rock mass quality.

Yours sincerely,

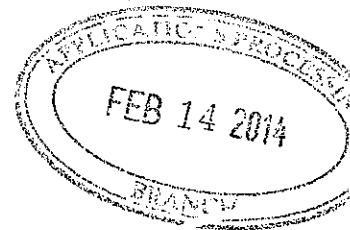


Norman Harris
Director, Research & Mapping Unit
Mines and Geology Division





**Ecosystems
Management
Branch**



Memo

To: Chalene Roye-Myrie, Environmental Officer-Application Processing Branch
From: Lisa Kirkland, Coordinator
Thru: Andrea Donaldson, Manager
Date: 14 February 2014
Re: Implementation Plan of Geotechnical Investigation for the First-Stage Container Terminal Project in the Portland Bight Port, Jamaica – 2014-14017-BL00010

The Ecosystems Management Branch has reviewed the captioned document *Implementation Plan of Geotechnical Investigation for the First-Stage Container Terminal Project in Portland Bight Port, Jamaica* proposed by PDI CCCC Water Transportation Consultants CO.,LTD. dated Jan. 2014. The following are general and specific comments on the plan:-

General Comments

1. ✓ A map of the project site at a legible size would facilitate a better review of the proposed activities.
2. ✓ The source of all data should be included in the document.
3. ✓ The plan contains a number of typos.
4. ✓ A list of acronyms would have been usefully and in its absence all abbreviations spelt out.

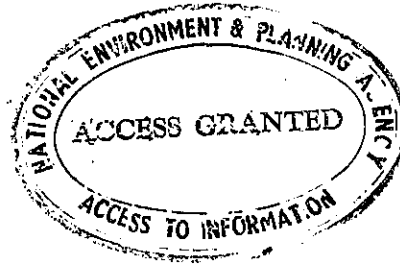
Specific Comments

- Page 1
 - The topographical and bathymetric maps of the area should be included as baseline data.
- Page 2
 - Figure 1.2 lacks detail, e.g. orientation, scale and location. Additionally the scale of presentation does not facilitate a review of the areas of impact.
- Page 14
 - 6. Project Management Organization: It is noted that the Engineering team seems to be from China, as such there should be some statement in the document which indicates that they are certified to

received via email

REVIEW**Implementation Plan of Engineering Survey / Geotechnical Investigation for the First Container Terminal Project in Portland Bight Port – Jamaica**

Ref no.: 2014-14017-BL00010

**Comments****HAZARD VULNERABILITY**

Possible negative impacts may include; dust, noise, water pollution, solid waste and transportation;

A. Dust and Noise

Dust generated during construction will result from clearing and earthworks for temporary access route. The major dust sources will be from the movement of vehicles transporting crew and equipment over unpaved routes within the project area and access roads.

However, under normal weather conditions impacts from the emissions of dust from related activities will be localized. Dust is likely to be confined within the proposed project area and within closed proximity of access road (right-of-way ROW), where clearance activity or other earth works is being carried out.

Noise and relatively minor vibration will be generated by equipment associated with the boring activities, including clearing, SPT tests, vehicle movements, etc. The main sources of noise will be limited to boring activities and mud pump and engines.

The noise is expected to be of a short duration and dispersion of the noise is likely to remain in close proximity equipment during operation.

Impact Significance

Based on the above, dust and noise emission impacts associated with the proposed investigation are of "low" significance.

B. WATER POLLUTION

The potential of impact to surface water will largely be confined to the zone over which the boats will operate for bathymetric survey and sampling of sea bed.

Impact Significance

Based on the above pollution of water associated with the proposed investigation be of "low" significance.

C. SOLID WASTE**Temporary access route**

Waste generated during the creation of access route shall be removed and disposed of in line with our standard permit requirements.

Impact Significance

Based on the proposed works, the wastes associated with the proposed activities will be of "low" significance.

D. TRAFFIC

The movement of equipment within the project area will require relatively minor traffic movement. Heavier equipment is expected to be used for mobilization and demobilization of geotechnical equipment.

Impact Significance

If proper control measures are followed during investigation, the potential transport/traffic impacts are expected to be of "low" significance.

CONCLUSION

- The direct environmental risks of the proposed surveys are generally relatively low and this is no exception. The proposed access route on the main land is generally disturbed lands that will not be at any significant risk base on the anticipated activities. Impact of route clearance on the Goat Islands may be referred to the Ecosystems Branch. Basically footprint for soil borings is very localized and limited to the sample points.
- Based on the documents reviewed the equipment and specification are acceptable.

Recommendations

Based on the information provided for proposed project area, the anticipated negative impacts are relatively low. I therefore have no objection to the proposed activities.