



THE TRINIDAD AND TOBAGO FIELD NATURALISTS' CLUB

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Regency Homes Limited,
P.O. Box 4651,
Western Main Road,
St James

August 27th 2016

To Whom It May Concern.

Re: APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL CLEARANCE – CEC# 4622/2015

Further to the request received for comment on the CEC#4622/2015 for the development of lands along the Cumuto-Tamana Road, we would like to submit the following complaint and comments for the official record. (Note that the name of the road appears to be incorrect on the provided document)

COMPLAINT

We wish to have our complaint noted that the deadline for comment on this application is unreasonably short. The request was dated 10th August with a deadline for comment on 27th August. We note that the Council of Presidents of the Environment (COPE) also received their request with the same short deadline. This could be interpreted as a deliberate attempt to reduce the likelihood of opposition to the project being officially recorded.

GENERAL COMMENTS

Proximity to the Arena Forest:

- 1) Edge effects of human developments and activities will adversely affect forest wildlife and may lead to gradual encroachment into the forest.
 - Developers and residents need to be closely monitored to ensure that no dumping/unapproved land use in the forest occurs.
 - Hunting regulations also need to be enforced in off season periods.
 - The developer should consider a wildlife management plan for treating with wildlife relocations etc.
 - Lighting on the periphery of the development near the forest should be designed not to have significant impact on plant circadian rhythms and wildlife e.g. avoidance of bright flood lighting/stadium type lighting.

- Fire hydrants should be installed near to the periphery of the settlement to mitigate the risk of bush fires caused by human activities. The setting of fires to burn refuse especially during the dry season should be prohibited.
- The botanic gardens should only contain native species and pose no risk of introducing non-native species to the surrounding ecosystem. Will these gardens fall under the management of the Horticultural Division or private management?

- 2) An Earthwatch funded project for monitoring the ocelot (*Leopardus pardalis*)- an Environmentally Sensitive Species is currently being carried out in the section of the Arena Forest directly south of the proposed development site. (The Hamgel Field Station has been active there since 2013, and is located directly north of the proposed development across the river at the end of Sar Sar Trace.)

<http://earthwatch.org/expeditions/monitoring-ocelots-in-trinidad>

According to researchers involved in the project, that area some of the highest vertebrate activity recorded on camera traps for the Arena Forest.

While the proposed development site has not been surveyed for this environmentally sensitive species, ocelot do inhabit a range of environments including forest edge, secondary forest and riparian areas. Therefore the possibility that ocelot also utilize the forest edge and river edge environments of the proposed development site has to be considered.

Note that according to the **Environmentally Sensitive Species (Ocelot) Notice, 2013, Part III**, any activities that otherwise disturb an environmentally sensitive species is prohibited by law.

Therefore it has to be satisfactorily determined whether or not ocelot utilize the proposed development site area. This can only be reliably done by the use of camera trapping in conjunction with appropriate bait lures.

- 3) The northern side of the site is along the Caroni River it has been reported and observed that this area is habitat for Neotropical River Otters, in addition to various bird and reptile life. Wet and dry season wildlife impact studies are recommended using camera trapping. In addition a, a wide river natural buffer zone and restriction fencing along the river zone is recommend with the prohibition of hunting and access of people, domestic pets and livestock to allow for undistributed habitat use of wildlife. Note that this area along the river would be prone to flooding and the inevitable presence of spectacled caiman at the site would further limit use.
- 4) Green site land use layout planning design is recommend to use natural tree buffers , local plants species along roads and infill areas. Retention of local tree species along water courses and in house plots. A proportion of local tree species and other indigenous vegetation should be retained on all plots for houses. Mature and semi mature trees should be retained both wild and domestic species for wildlife habitat.

- 5) Protection of all gullies and waterway on the proposed development site. A protection buffer zone to protect the natural water flow and inflation of water of all gullies and waterway on the plots.

A natural water management plan using slow drainage and natural features are recommended for the site to retain natural water flows and protect natural water management systems. A water flow plan must be done to manage the increased water increase expected for the site.

- 6) The proposed development site is part of a major catchment area for the Caroni River before the other rivers flow into it on its way through the Caroni plains into the sea. A Green design waste water rain water (ponds, slow drainage) domestic, sewage treatment, and site solid and liquid waste plan and management system must be put in place and be maintained post development.

In particular:

- 1) Will a central sewage system with a sewage treatment plant be constructed or individual septic systems be constructed by householders/ for each apartment building? If individual septic systems are to be used, then a minimum standard of design should be enforced.
- 2) The septic system for any facilities at the recreational area near the river need to be carefully designed to ensure no contamination of the river occurs.

Therefore, a determination of how the proposed development will affect the Caroni River (in terms of water volume, retention, pollution etc) is needed.

- 7) General waste management of recreational areas: A recycling program/ development waste management plan should form part of the EIA/supporting documentation. The application for iCare recycling bins at all recreational common spaces may be considered for example.
- 8) With respect to the Farmers' Market, waste water and refuse including meat scraps need to be carefully disposed of to avoid health hazards and attraction of vermin and wildlife from the adjacent forest.
- 9) Heritage and archeological sites and artifacts protection: A site development protocol must be put in place not to damage and report any Heritage and Archeological sites and artifacts that may be encountered. It would be an asset to the development to show case Heritage and archeological sites and artifacts protection and would increase the site product value.

In general, the developer should use all available and reasonable site development green planning methods and have an accountable green protection protocol in the land development (especially soil, natural water drainage vegetation, wildlife and heritage protection) and post development monitoring and reporting.

From the point of view of aesthetic, the tree cover at the site must be retained as much as possible - the drive through the area has less vehicular traffic and the forest cover is a great sight during the rainy seasons.

CONCLUSION

There are many areas in the country where development can occur but further encroachment of the forests and urbanization of the catchment area of the Caroni River will be a detriment to the environment as well as the population.

The following has to be determined:

- 1) What area of coverage of terrestrial habitat will be cleared, and what are the organisms likely to be affected, and what measures can be put in place to mitigate this impact?
- 2) What are the aquatic organisms that stand to be affected during both the construction and operational phases of this development, and what measures can be put in place to mitigate this impact?
- 3) The public consultation notice says "effective mitigation measures shall be employed to minimize negative impacts." We need to know what these mitigation measures are (as per 1 and 2 above). Also, we need to know who will actually monitor the implementation of these mitigation measures - for effectiveness - and wish to suggest that a neutral party be utilized to this effect, for greater transparency in this regard.

Yours Respectfully,



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