



17 September 2007

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Dear Mr. Paterson and Mr. Paul,

We have had an opportunity to review the Environmental Impact Assessment for the Four Seasons Resort and Private Residences, Mt Hartman and Hog Island Estate, Grenada.

In consultation with other conservation groups and scientists concerned about the resort and its potential impacts on the Grenada Dove, we have prepared the attached review. We have concluded that the EIA is deeply flawed and does not adequately assess the proposed resort. None of the recommendations listed in a checklist attached to our letter dated 28 June 2007 have been considered or addressed. Of greatest concern and contrary to international best practices, the EIA considers only one development scenario, as opposed to multiple variants of the development plan. This is unacceptable, given that the development is planned for an area of global importance for biodiversity conservation. When planning a development in an area of this significance, all parties in the development process should be committed to consideration of all possible alternatives and their environmental pros and cons. Instead, the development partners are obviously committed to one plan and a process that will result in its acceptance. We continue to be concerned that the entire development process up to this point is lacking in transparency and in a willingness on the part of the developers (Capital 88 and Cinnamon 88), the resort operators (Four Seasons), and the government of Grenada to engage in an open, science-based review process involving all relevant stakeholders.

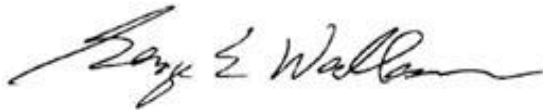
The EIA is not an adequate review of the proposed development. It needs significant reworking in order to be a credible assessment. We understand that the development partners will submit a revised master plan in the very near future. This must be accompanied by a revised EIA that evaluates the revised master plan and alternatives that address environmental concerns, especially for the protection of the Grenada Dove as elaborated in the following review of the EIA. Anything short of this cannot, and will not, pass muster with national and international stakeholders and interested parties with a concern for Grenada's natural heritage.

Thank you for considering our review. This is a major issue for American Bird Conservancy and for conservationists around the world. We plan to stay involved and to do all we can to ensure that the development plan provides adequate protections for the Grenada Dove.

Yours sincerely,



George Fenwick, PhD, President



George E. Wallace, PhD, Vice President and Chief Conservation Officer



Paul Salaman, PhD, International Programs Director

c.c.: Richard Andrews, Special Advisor to the Prime Minister and Chairman of the Hog Island Resort Committee (Fax: 473-440-4116)

Sen. the Hon. Ann David-Antoine, Minister of Health, Social Security, the Environment, and Ecclesiastic Relations (Fax: 473-440-4127; min-healthgrenada@caribsurf.com)

Peter Hodgson, Vice President for Corporate Planning, Four Seasons Hotels and Resorts (peter.hodgson@fourseasons.com)

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Comments on the Environmental Impact Assessment for the Four Seasons Resort and Private Residences, Mt. Hartman and Hog Island Estate, Grenada

American Bird Conservancy, September 2007

These comments focus primarily on terrestrial biodiversity issues--particularly the survival prospects of the critically endangered Grenada Dove--even though the planned resort poses other significant environmental concerns, including the loss of mangroves and damage to the marine environment.

Lack of Timely and Accurate Biodiversity Information. The information presented in the EIA report on the biodiversity of the Mt. Hartman Estate is inadequate for properly informed decision-making. No field survey of Grenada Doves was done as part of the EIA. Moreover, the EIA fails to use even the available Grenada Dove survey data (from 2004 and previous years) to present any overlay maps of Grenada Dove distribution, in relation to the siting of the planned villas and golf course, or the existing or proposed new Dove Sanctuary boundaries.

Understated Importance of Mt. Hartman to the Grenada Dove's Survival. The report grossly understates the importance of the Mt. Hartman Estate (both within the existing Dove Sanctuary and certain adjacent areas) to the global survival of the Grenada Dove. The data in Table 4.5 strongly suggest around 30 pairs (or 60 adult birds) are capable of residing within the current habitat within the Mt. Hartman Estate. This number is much larger than any of the other Grenada Dove populations on the island, each of which by itself is much smaller, and thus much less likely to persist in the long run. The report fails to make the key point that the northeast sector of the Mt. Hartman Estate (in particular, the northern two units of the existing Dove Sanctuary and the Grenada Dove habitat in between) has the only Grenada Dove population anywhere that is large enough to have a high likelihood of remaining biologically viable over the long term. The statement that (pre-Hurricane Ivan) the Mt. Hartman National Park harbored only 22% of the total population (or that the entire Mt. Hartman Estate harbored only about 30%) is misleading, because all of the remaining population were (and still are) in relatively very small and dispersed pockets of remaining habitat (not contiguous, as they now are at Mt. Hartman). Moreover, Table 4.5 also shows (but the report does not otherwise mention) that the overwhelming majority of Grenada Doves within any protected area are at Mt. Hartman (the Perseverance Dove Sanctuary is much smaller, with far fewer of these birds).

Mt. Hartman is the center of the largest population of Grenada Doves. It is likely the source for the smaller numbers of doves that occur outside and near Mt. Hartman. As stated by Dr. David Blockstein in a December 22, 2006 letter to Prime Minister Mitchell, "My research and the subsequent work of my colleague Bonnie Rusk has demonstrated that the Mt. Hartman estate is the most important habitat for the Grenada Dove. It is for this reason, and on our recommendations, that the Government of Grenada, in its wisdom, protected Mt. Hartman in perpetuity as a National Park. The protection provided by the National Park has been successful at protecting the Dove and other species of southwest Grenada. The Grenada Dove flourished and its population increased to the point where it repopulated adjacent lands, which are inferior in quality to Mount Hartman. It is very likely that the protection of the National Park allowed the Grenada Dove population to survive the destruction of Hurricane Ivan. Ms. Rusk's work showed

that post hurricane Ivan (2004), over 50% of all the remaining Grenada Doves were in Mt. Hartman Estate and immediately surrounding forest.”

Disastrous Impacts on Grenada Dove Habitat and the Species’ Survival Prospects. The report’s text vaguely suggests that the resort development would actually improve the Grenada Dove’s survival prospects. However, the report’s maps seem to tell a very different story—that a substantial area of existing, high-quality Grenada Dove habitat (mostly in the northeast sector of the Mt. Hartman estate) would be lost to villa development. The report fails to quantify the expected loss (in acres) of actual (or potential future) Grenada Dove habitat, nor the likely corresponding decline in the Grenada Dove population. However, in the absence of more precise information (with an overlay map of Grenada Dove territories versus proposed villa sites), we surmise that as much as 1/2 of the existing Grenada Dove habitat might be lost, which could translate into a similar decline in the number of individuals (perhaps from 60 to 30). Such a large drop in what is now by far the most viable population of Grenada Doves on the island would greatly increase the risk of the species’ extinction. Conservation biology theory suggests that populations of fewer than about 50 birds face an especially high extinction risk due to vulnerability to (weather-related or other) fluctuations in breeding success and adult survival, and exposure to catastrophic losses (from diseases, fires, hurricanes, etc.) as well as other possible effects. It should also be noted that, although the EIA never directly admits it, the maps presented strongly suggest that the proposed area for the re-defined Dove Sanctuary would be considerably smaller than the existing Dove Sanctuary (National Park)—perhaps only 100 acres instead of the current 154 acres.

As stated by Dr. Blockstein, “Mount Hartman National Park is small (less than 155 acres). It cannot withstand the proposed development and still provide a home for the Grenada Dove, the threatened Grenada Hook-billed Kite (*Chondrohierax uncinatus uncinatus*), which I also studied, and other species.”

No Analysis of Alternatives for Resort Design. Counter to accepted international good practice for environmental assessment, the EIA report provides no analysis of alternative resort development options. Alternative options need to be seriously considered that would have a substantially smaller “footprint” of habitat destruction and thus maintain intact more of the existing (or even the potential future) Grenada Dove habitat. Such alternatives would entail a larger Dove Sanctuary that would allow for maintaining (or even increasing) the Grenada Dove population at Mt. Hartman, along with a smaller number of villas and/or smaller average lot size per villa, and perhaps also alternatives to an 18-hole golf course (such as a 9-hole course, or an equestrian pasture). Each such alternative should be compared in terms of its implications for Grenada Dove conservation (in terms of how much high-quality habitat, and about how many birds, would remain in the area outside the developed resort area, i.e. within the re-defined Dove Sanctuary).

We recommend that at least five scenarios for the development be considered:

1. The baseline situation – no development.
2. The current proposal, which must be analyzed with much more rigor than in the current document.

3. No net loss of Grenada Dove habitat within the boundaries of the existing sanctuary. This option would destroy current dove habitat that is outside the protected area and would entail slightly fewer villas than currently planned.
4. No net loss of existing Grenada Dove habitat, including habitat that is both currently protected and unprotected. This alternative would not permit any future expansion of the dove population or its habitat and would require an even greater reduction in the number of villas.
5. No destruction of existing habitat (protected or unprotected) and restoration of degraded areas. This would require yet further reductions in the number of villas and reduction in the scale of the golf facility.

Conservation Trust Details Lacking. The EIA mentions that a Grenada Dove Conservation Trust will be established to protect and manage the re-defined Dove Sanctuary, with financial support “provided by the developers” (Section 7.1). However, the EIA fails to provide the key details of how this Trust would function, in terms of its legal status, decision-making structure, operating rules, public accountability, land tenure, sources and flow of funds, membership, sources of management expertise (Forest Department, which NGOs, etc.), specific obligations of Cinnamon 88 and Four Seasons, etc. Furthermore, no timetable is provided for by when these details would be worked out—it needs to be **before** any Mt. Hartman Estate government lands are transferred to Cinnamon 88, or any other private party.

Inaccurate and Misleading Information on the Condition of the Mt. Hartman Estate and Hog Island. The EIA report gives an exaggerated impression of the seriousness of ongoing environmental degradation (refuse dumping, soil removal, cattle grazing, charcoal burning, etc.), without mentioning that these problems are almost entirely confined to the portion of Mt. Hartman Estate that is outside the existing National Park (Dove Sanctuary). In other words, available independent evidence suggests that the National Park is indeed functioning effectively, in terms of protecting the area of Grenada Dove habitat that falls within its present boundaries. Conversely, this April 2007 report makes no mention of the extensive land clearing (evidently part of the same resort development) that took place in late 2006 on Hog Island, fundamentally changing the baseline environmental conditions on about ½ of the island (along with the adjacent marine environment, which is vulnerable to increased sedimentation). The report should indicate whether this clearing was done legally (with the appropriate permits from Government) and, if not, whether and how the responsible parties have been (or are to be) sanctioned. The clearing has a stunning resemblance to the layout proposed for the development on Hog Island.

No Written Commitment to Implementing any of the Environmental Recommendations. The EIA provides a variety of environmental recommendations, of generally limited usefulness (though none that would adequately mitigate the resort’s likely damage to the survival prospects of the Grenada Dove). Some of the EIA’s recommendations could even be counterproductive if implemented. For example, the EIA suggests using wind power to provide electricity to the resort. Although they probably would not affect Grenada Doves, wind turbines add an additional risk factor that could kill soaring Hook-billed Kites (a Critically Endangered subspecies unique to Grenada). Thus wind turbines are not appropriate for an area as ecologically sensitive as Mt. Hartman. Moreover, there is no stated commitment anywhere in the document by the proposed resort developer (Cinnamon 88), nor the planned operator (Four Seasons), to implement any of the EIA’s (inadequate and often poorly formulated) recommendations. In fact, even the firm that

prepared the EIA (JECO Caribbean) seems to disown its own report, stating in Section 1.8: “The assessment and conclusions of this report does [sic] not provide an endorsement or approval of the project by JECO Caribbean Inc...” The report does not even name any of its authors (although we infer that the main author is Velma Jessamy). In other words, nobody appears to take responsibility for this report, least of all the developer or the operator, who would be expected to implement its recommendations.

No Meaningful Stakeholder Consultation. The EIA selectively presents data on some (generally very pro-project) opinions expressed by certain Grand Anse Valley and Clark’s Court Bay residents. This is far from being a proper stakeholder consultation, for at least three reasons. First, the full range of stakeholders and interested members of the public were never consulted; moreover, to our knowledge, this EIA report has not, even now, been publicly disclosed within Grenada. Second, the very little consultation that has taken place so far has not been **informed**, in that specific information about this particular resort development, and its expected impacts on the Grenada Dove and on other (terrestrial and marine) natural resources, has not been made available to the (very few, so far) people being consulted. Third, there is evidence (including a Government of Grenada News Release of February 28, 2007) that persons who seriously question the proposed development might be subject to legal action and punished for their statements.

Fundamental Requirements for Dove Protection. The attached letter of June 28, 2007 from American Bird Conservancy to Robin Patterson and Roy Paul of Capital 88 (and an identical letter sent to Peter Hodgson of Four Seasons Corporation) provides a checklist of required elements to ensure the highest environmental standards that will protect the Grenada Dove while allowing for the economic development that Grenada desires. We recommend that the project be modified and reevaluated according to these criteria, beginning with a scientifically credible Biodiversity Assessment of the Mt. Hartman Estate and Hog Island.