BREEF- EARTHCARE- reEarth – Save the Bays - Waterkeepers Bahamas - Waterkeeper Alliance

June 26, 2019

Dear Dr. Penning,

Thank you for your response to our May 2nd letter stating our concerns about the inadequacy of the environmental review now underway on the proposed private cruise ship port at Lighthouse Point.

We acknowledge your long career of caring for wildlife and wild places and Disney's strong commitment and capacity to protect the environment. We note your statement that you undertook a "detailed review" of our letter and that many of the essential studies are already underway.

With that said, we are disappointed to see no change in the posture Disney Cruise Line (DCL) has taken in its effort to rush through a decision on the future of Lighthouse Point, which we agree is a "special place" We remain very concerned about the inadequacy of the Environmental Impact Assessment (EIA), the continued lack of transparency, and the questionable commitment to public engagement. We agree that the BEST Commission, an agency with a small fraction of your staff, certainly has a significant role to play. However, we expect that

Disney will maintain the same high environmental standards and practices regardless of whether it is operating in the U.S. or elsewhere. Thus, this is a case where DCL's EIA, consistent with The Walt Disney Company's Environmental Policy, must far exceed the environmental laws, regulations, and processes in The Bahamas.

DCL continues to understate the environmental impacts of plans to transform pristine Lighthouse Point that is situated in a proposed Marine Protected Area into a high-volume cruise port. We are also troubled by the view that many of our suggestions regarding the EIA do not apply because DCL is not dredging a ship channel. It is not clear that the impacts of DCL's plans for construction of a 0.6-mile-long pier, dock, and excavation for marinas are any less damaging than those associated with a dredged ship channel.

The extent to which we and the Bahamian people may be "misinformed" about the project and its impacts is due to the lack of transparency in the process to date. As part of Disney's latest Environmental Stewardship Goals and Targets, the company professed a commitment to "a new era of transparency." We hope that moving forward DCL will comply with this promise.

We once again ask that Disney undertake a world-class EIA on Lighthouse Point. Such an EIA must begin with disclosure of the scope of the EIA and full public consultation, the lack of which here can still be remedied. The EIA should include 1) full analysis of the economic benefits so they can be measured against the costs of major environmental impacts associated with the construction and operation of the port, and 2) full consideration of alternative sites for the proposed port.

Lighthouse Point is not only important to generations of Bahamians, but also to visitors from the U.S. and around the world who have experienced the site's unique beauty. Its limestone cliffs overlook 18,000 acres of a biologically rich proposed Marine Protected Area that is an essential part of The Bahamas' international commitment to protect 20% of its marine resources by 2020. Disney has an opportunity to change the course of this project to protect the Point and surrounding seas for future generations. The world will be watching the decision Disney and ultimately the people of The Bahamas make about the future of Lighthouse Point.

As previously stated, we are eager to cooperate with DCL in assuring an adequate environmental review of the project and to explore a win-win alternative.

Sincerely yours,

Casuarina McKinney-Lambert

Executive Director

Bahamas Reef Environment Educational Foundation

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Please reply to the signers via sam@reaearth.org

cc: Robert Chapek, Disney

Elissa Margolis, Disney

Jeff Vahle, President, Disney