

December 30, 2024

Mr. Frederick Southwell  
Chief Town and Country Planner  
Development Control Authority  
Friar's Hill Road  
St. John's  
Antigua, B.W.I

Dear Mr. Southwell,

We write in reference to your communication dated May 13, 2024, relating to the Plan Application #G05-2024 for the proposed Murbee Resort Inc.'s Rosewood Barbuda Resort development. The DCA letter requested an ESIA and included the DoE's report and Terms of Reference (ToR) indicating specific topics to be addressed in the ESIA.

We are pleased to submit the attached ESIA electronically and in three hard copies. The ESIA comprises 888 pages including appendices and annexes.

The DoE's report requested that certain topics be addressed in the ESIA. We have indicated below where the information and responses to these topics can be found in the ESIA. These are indicated in bold below following each item referenced by the DoE in its report.

*Drainage and Hydrology:*

- A comprehensive drainage plan detailing stormwater management strategy for both the construction and operation phases is required. This plan should include Best Management Practices (BMPs) for runoff control and a maintenance program for implemented BMPs.
- A hydrological report assessing the development's impact on existing hydraulic systems and proposing mitigation strategies for stormwater management is necessary.

**A drainage plan for the original master plan submitted with the G-application is summarized in Section 6.1.2, with the full drainage report included in Appendix 9. A more detailed hydrological plan that integrates into the nature-based solutions (mangrove lagoons) and master-plan/landscape design is in progress and the project will submit the final options and designs.**

*Wastewater Management*

- While the application outlines plans for an MBR wastewater treatment plant, a detailed operational management plan for the MBR plant needs to be submitted. This plan should address specific technical details, operational procedures, and effluent monitoring protocols.
- The Environmental Impact Assessment (EIA) should incorporate a dedicated section on wastewater management, including a description of the MBR plant, an evaluation of its suitability for the project's specific needs, and a clear plan for effluent reuse for irrigation.

**The details of the planned MBR wastewater treatment plant and general operations can be found in Section 2.1.5.3.**

*Marine Impact:*

- A comprehensive EIA that specifically addresses the potential impacts of marina construction and operation on nearby coral reefs. Based on the EIA findings, mitigation strategies to minimize or eliminate negative impacts on coral reefs should be developed. These might include redesigning the marina layout, implementing stricter anchoring regulations, and employing sediment control measures during construction. Public consultations to raise awareness about the importance of coral reef ecosystems and responsible boating practices are encouraged.

**The revised master plan submitted to the DCA no longer includes a marina. However, a comprehensive marine survey was completed, and the results are presented in Section 5.4.6. In addition, recommendations for conserving coral reef ecosystems and increasing education and awareness are included in the mitigation section**

*Climate Change Impacts:*

- The project's vulnerability to climate change, including sea level rise, increased tropical cyclone frequency, and precipitation variations, needs to be addressed in the EIA.
- Considering the high erosion risk on the development site (Category 3 beach), a setback of 40 meters from the Line of Permanent Vegetation (LPV) is recommended. Additionally, utilizing the predicted SL.R setback distance as the primary development boundary is encouraged.
- A comprehensive EIA that incorporates the recommendations outlined above is crucial for the project's environmental approval. The EIA should address all potential environmental impacts and propose effective mitigation measures. The ToR to guide the preparation of the EIA is attached.

**The risks related to climate change, including sea level rise, beach erosion, tropical cyclone frequency, and extreme rainfall and drought, are included in Section 6.0, the appendix on coastal vulnerability assessment, and more generally included in the assessments and discussions relevant sections of the text. The management plan for hurricane events is included in the Disaster Management Plan in Section 7.0. The ecological team recommended an updated and comprehensive coastal vulnerability assessment which the developers agreed to conduct. This incorporates climate change into FFE, setbacks, dune heights etc. and the full report is provided in an Appendix. The findings are currently being incorporated into final planning.**

If you have any questions please contact us.

Sincerely,

*D Brosnan*

Dr. Deborah Brosnan  
President  
Deborah Brosnan & Associates

c.c. Dept of Environment