



**STATEMENT FROM THE JAMAICA ENVIRONMENT TRUST (JET)
RE THE PALISADOES ROADWORKS
TO THE PUBLIC MEETING ON 4TH OCTOBER 2010**

Will there be a Four-Lane Highway on the Palisadoes Spit?

1. The National Works Agency (NWA) and the National Environment and Planning Agency (NEPA) have recently both been at pains to correct statements that the road works underway will result in a four-lane highway. JET attaches two stories – one from the website of the Ministry of Transport and Works, one from the website of the Jamaica Labour Party both stating that the road will be a four-lane highway. The public has merely responded to what was explicitly stated by both Minister Mike Henry and the NWA.
2. The NWA is now stating that the road will be a two lane road with two soft shoulders. That is what is there now. All that is needed is for the soft shoulders to be repaired – this could be done at considerably less cost.

How much employment will be generated?

1. The NWA has claimed that this road will result in significant employment for the people of adjoining communities and figures of several thousand jobs were quoted at both ground breaking ceremonies. The reality has now become apparent – there will be no more than 50 jobs and it is not clear how many of even these jobs will go to the residents of nearby communities. See story attached from RJR news, following a demonstration on September 22nd, 2010.

Can Jamaica afford these roadworks?

1. This is borrowed money. It is not a grant. We are frequently told that debt is crippling Jamaica and recently, Jamaicans holding investments in local instruments were asked to accept a sacrifice during the Jamaica Debt Exchange to bring our debt under control. We have borrowed US\$55.8 million (almost J\$5 BILLION) to expand/build a road which cannot be justified on usage grounds. The Jamaica taxpayer will have to pay back US\$9.8 million (about J\$850 million).
2. The interest rate sounds low at 3%, but JET has researched available loans for road construction which are much lower – about 1.75%. We are borrowing money to build a totally unnecessary road at higher than necessary interest rates. WHY?

Was the approvals process rational and transparent?

1. JET lodges the strongest possible objection to the approvals process for this large infrastructure project being carried out within the Palisadoes/Port Royal Protected Area. The work has been allowed by NEPA without:

- An Environmental Impact Assessment (EIA) (The 2007 EIA does NOT apply to road construction. It concerns the revetment, dredging of sand and the re vegetating of a constructed dune)
 - A public consultation meeting (The meeting on October 4th is taking place after the project is well underway)
 - An environmental permit for the clearing and excavation of the beach
2. The public has been left to wonder and speculate about the true rationale for and scope of this work. There are many questions: - Will the existing road alignment be used? What is the purpose of the huge trench that has been dug on the sea side of the existing road? Why is the road expansion being done on the sea side of the existing road, where it will be more vulnerable? The 2007 EIA recommended (but did not evaluate) construction of a raised road on the northern side of the existing road – why was this advice ignored? If sea walls are to run the length of the Palisadoes strip, all technical advice that JET has received suggests that the entire southern beach will disappear and the sea will pound against the sea walls. How will the sea walls be maintained? Will we not simply hear about “resource constraints” as the sea walls fall into disrepair, as the groynes did? Will the Palisadoes spit between Harbour View and the airport become entirely a man-made space – a road between two sea walls with a board walk – which will also need maintenance. If that is to be so, why were the natural resources in this area protected in the first place?

The Environmental Issues

1. NEPA allowed widescale bulldozing of a turtle nesting beach during the nesting season.
2. NEPA allowed widesale bulldozing of the Palisadoes spit at the height of the hurricane season, rendering it considerably more vulnerable to storm surge.
3. NEPA allowed the widescale bulldozing of sand dunes, the beach and destruction of virtually all vegetation. The only mitigation measure taken was the removal of three tiny individual endemic cacti to the Port Royal Marine Lab.
4. NEPA seems to have relied on the 2007 EIA for mitigation measures with regard to the sand dunes and the beach vegetation. The 2007 EIA stated that a landscaping and re vegetation plan should be done, but it is unclear if this was ever done – certainly it is clear that no such plan guided the work that has already been done on the Palisadoes Spit . Indeed, in the 2007 EIA, some of the plant species remain unidentified.
5. NEPA has given a permit for the removal of the small mangrove trees planted by them on the harbour side – what was the point of that exercise? Who paid for it? The Palisadoes/Port Royal Protected Area is also a Ramsar site – a wetland of international importance. Was the Ramsar Secretariat notified of this project, as required by the international agreement the GOJ has signed? What does this designation mean in reality, if wetlands so easily sacrificed?
6. NEPA has allowed the destruction of a very rare habitat in Jamaica – semi desert – see the letter dated September 26th, 2010 in the Gleaner from Drs.Karl Aiken and Mona Webber of UWI . NEPA contents that it will be restored, but this demonstrates considerable ignorance of the complexities and fragility of such habitats. All advice JET has received from experts states that the key to dune restoration and health is sufficient horizontal space for the dunes to wax and wane with bad weather and seasons, to repair themselves, in other words. It is clear that the work already done on Palisadoes will greatly reduce horizontal space.

The Protection of the Palisadoes Spit from bad weather

1. One contention has been that these works are necessary for the protection of the road itself. The road was already protected by the previous works which built the revetment. That work was never completed – the revetment was supposed to be covered with dredged sand and then re vegetated. There were supposed to be boardwalks and other amenities on the constructed dune. All that was necessary was that this work be completed.

Priorities for development projects

1. In the wake of TD Nicole, all around us we see devastation to roads, bridges and other types of infrastructure. Why is this project a priority? Are there not a dozen roads more in need of elevation – the Mandela Highway springs to mind? Are there not many more roads clogged with traffic which could be expanded? Other, critical roads that are unusable after a storm – the Sligoville alternative route to the Rio Cobre gorge, for instance? What would happen if we spent J\$5 BILLION in adjoining communities? How many clinics, schools and community centres could we build? What if we spent J\$5 BILLION on paying our teachers, policemen and nurses? What if we spent J\$5 BILLION on kidney dialysis or X-ray machines, or CAT-scan equipment? Are there not a thousand more important things that we need and are told we cannot have because we do not have the money?

What should have been done instead

1. The vulnerable part of Palisadoes road (between Harbour View and the airport) had already been protected by the revetment, but that work was never completed. It should have been finished. The soft shoulders should have been repaired and the sand replaced on the sea side of the revetment. Re vegetation of the dunes should have been done. The board walks should have been built – this would have kept people off the dunes and allowed recreational opportunities. More mangroves on the harbour side should have been replanted.
2. We could have bought heavy equipment to clear the road after storm events dumped sand on the road for what, US\$5 million? These could then have been deployed immediately after storm events to clear the road of sand and would have been available for other uses as well.
3. Due to the projections for sea level rise, there are some areas of the road – SOME – that could have been raised without the devastation that has been unleashed on a fragile protected area.

AND IT IS NOT TOO LATE TO DO THOSE THINGS NOW – BEFORE THE PALISADOES STRIP HAS BEEN MADE INTO A ROAD BETWEEN TWO SEA WALLS... EVEN THE CHINESE AMBASSADOR SAYS THE ROAD CAN BE STOPPED IF JAMAICA DOES NOT WANT IT... WHO DECIDES WHAT JAMAICA WANTS? IS IT JUST MINISTER MIKE HENRY AND THE NWA?