

Additional Response to Responses to Additional Comments Received from the Public by the National Environment & Planning Agency

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In reading the Responses-to-additional-comments-received-from-the Public-CD&A-March PDF from CD&A, it is clear that the responses given by CD&A to concerns submitted by public commenters do not aim to actually address concerns and show either woeful negligence or ignorance by both CD&A and NEPA. The comments submitted by the public for the environmental and human health of the area go beyond an academic exercise. On page 2 of the response PDF, the authors state that the commenters do not designate between CCPA and Cockpit Country (CC), and I would remind NEPA that most species do not either. Any area that is mined adjacent to CCPA will be negatively impacted by mining activities and no environmental remediation is a substitute for simply not allowing the mining to occur in the first place. Furthermore, it is odd that this response document from CD&A includes on page 3, “The review contains a number of conjectures and speculative statements without providing any supporting evidence”. This statement alone shows that the public comments must not have been reviewed in detail knowing that comments submitted previously had a full list of citations from peer-reviewed sources when appropriate. Many responses provided to concerns did little more than to point back to pages of their initial EIA and demonstrated the lack of understanding of the science being discussed. For example, the response from CD&A to the comment concerning the disruption to biodiversity on hills (pg. 28) demonstrates that the point being made was missed by CD&A. While the mining may be focused on the low-laying areas, the activity of mining would be disruptive to the entire area because those low-laying areas act as conduits between the hills as is commonly known in several ecological concepts that have been demonstrated by decades of research starting with the Theory of Island Biogeography (MacArthur and Wilson 1967). It is such a fundamental concept to understanding how ecosystems function and how biodiversity flourishes in island and island-like environments. The response to comment goes into detail about soil fertility which was not the subject of the comment in the first place. This is a red herring response to the comment which only aims to mislead rather than address the actual comment which addressed concerns about habitat connectivity and biodiversity.

The most concerning part of this is that NEPA is willing to rush this EIA and approve any permit for SML-173 to jeopardize the environmental and ecological health of one of their most important resources. Although SML-173 is outside the boundaries of the government-designated CCPA, the ecosystems are interconnected and human boundaries are artificial. There are many species range overlaps between the area designated as CCPA and SML-173 which would indicate that these areas are intertwined ecologically. Many of those species cannot be found elsewhere on the island of Jamaica. Jamaica has hundreds of endemic species which cannot be found anywhere else in the world. Instead of valuing their ecological resources, it is apparent through this rushed review of the EIA and the response to public comments to the EIA

that NEPA has been negligent in taking these concerns seriously, and CD&A's EIA is indefensible at this time until NEPA further reviews public commentary and a third neutral party is able to conduct a legitimate environmental impact assessment.