

December 9, 2019

To whom it may concern,

Verdant Isle is proposing to demolish 32.5 acres of prime coral reef habitat. The damage will be permanent, and adjoining reefs will also be destroyed. The company can never compensate for deliberately destroying reefs by claiming to grow corals somewhere else. Those claims are false.

The company is pretending that permanent damage to reef habitat doesn't matter, because they claim that they can grow corals somewhere else. But no-one has ever restored the biodiversity of a damaged reef – their promises to grow new reefs are deceptive and unfounded.

Vaughan's technique for growing coral tissue has never succeeded in growing more than a handful of corals outside of an aquarium. There is no scientific evidence that coral tissue the size of a postage-stamp could ever repopulate a single acre of coral reef.

An acre of a healthy coral reefs typically contains over a million corals. Verdant Isles's claim that they can remove 30-50% of the corals isn't remotely credible. The vast majority of the corals will be left behind to be destroyed by the dredger. Others will be shattered by attempts to move them, and many will die of the shock of being relocated elsewhere. In any case, a coral reef has many, many 1000s of species per acre, not just the corals. The entire habitat will be destroyed, irreparably.

The benthic survey undertaken by CSA Ocean Science Inc. on behalf of the Cayman Islands Government "in support of the project" is incomplete and grossly inadequate. Large areas in the southern portion of the proposed dredge site were not surveyed at all. A proper mapping survey should have been conducted to accurately count the number of hard and soft corals (see <https://link.springer.com/article/10.1007/s00338-017-1624-3>), and to quantify other benthic (e.g. sponges) and motile species (e.g. molluscs, crustaceans, echinoderms, and fishes).

Sincerely,



Terry Hughes FAA, Director