



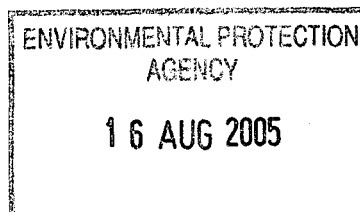
221-1
 Eastern Regional Fisheries Board
 Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
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Ann Bosley
 Environmental Protection Agency,
 Office of Licensing and Guidance,
 PO Box 3000,
 Johnstown Castle Estate,
 Co. Wexford.

Sub (1)



Your Reference – 221-1
 Our Reference – BB/DD/86

August 10th, 2005

-Re: 221-1 Waste Licence for Dublin City Council Labre Park Civic Amenities Site, Ballyfermot, Dublin 10.

Dear Ms. Bosley,

In relation to the above waste licence application, please find the Board's observations outlined below:

- The proposed development is located within the catchment of the Camac River, an important urban salmonid system. The Camac is a tributary of the River Liffey which supports both salmon and trout populations in this area. Development is proposed which potentially will impact directly on these watercourses via surface water discharges.
- Ground preparation and associated construction works, including large-scale topographic alteration and the creation of roads and buildings (as proposed), have significant potential to cause the release of sediments and pollutants into surrounding watercourses. Pollution of the adjacent freshwaters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this freshwater system. A comprehensive and integrated approach for achieving surface water protection during plant construction and operation should be implemented as described in EIS section 13.
- On-site attenuation ponds should allow for the settlement of fine/particulate materials. Petrol/oil interception and hydrobrake controls should be in place on primary surface water discharges to protect receiving freshwaters. Silt fencing of discharge streams would also be recommended during construction. Diffuse sources of pollution should be addressed and managed

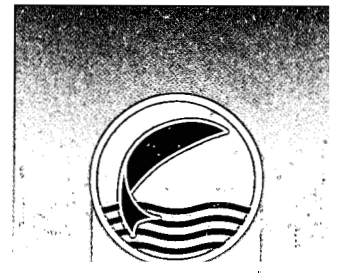
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by implementing best practice in pollution control in the long term at this site (e.g. Sustainable Urban Drainage Systems guidance).

- The EIS mentions the pumping of groundwater from construction areas into surface waters. Any such discharge could prove highly detrimental to water quality in surface waters and should be referred to the Board and all competent authorities for assessment before proceeding.
- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (<http://www.fishingireland.net/erfb/protect.htm>) be consulted when undertaking any works on this site, particularly in the vicinity of surface water features. The Board requests that it be informed at least 3-4 weeks in advance of any diversion work to be carried out during channel alterations of any kind.
- Water quality monitoring of both surface waters and ground waters should be undertaken on a regular basis as standard practice.
- It should be stressed that although the EIS identifies the absence of rare or protected species at the site, salmonid species are present in the Camac River channel downstream of the site. Any discharge from this site has the potential to impact the Camac and Liffey Rivers downstream.

I trust you will take our observations on board when assessing this application

Yours sincerely,

Brian Beckett – Fisheries Environmental Officer, Dublin District.

