

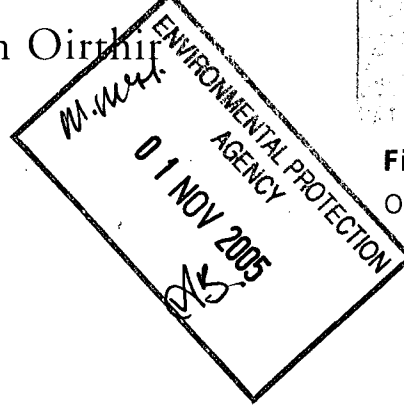


Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage



223-1

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

Your Reference: 223-1
Our Reference: BB/DD/242

October 28th, 2005

Re: Proposed Kilshane Cross Recycling Park EIS.

Dear Miss Bosley,

In relation to the above proposed development and your correspondence dated September 29th 2005, please find the Board's comments outlined below:

- The ERFB does not object to the proposed development from a fisheries perspective however, the development is within the catchment of the Ward River, an important salmonid system. Streams from the proposed site drain into the Ward River around the Owens Bridge area.
- The Ward River is exceptional among rivers in the area in having resident salmon and sea trout populations, highlighting the ecological sensitivity of this particular watercourse and the Ward catchment in general. Electrofishing surveys carried out in September 2003 by the ERFB found a significant population of juvenile salmon in the lower reaches of the Ward around Swords. Sea trout have been found in the Ward upstream of Coolatrath Bridge in the Lower Ward area.
- 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 4.2.
- Substantial potential exists for pollution of local surface waters as a result of foul water loadings from this development (EIS Table 3.2.6).

The Eastern Regional
Fisheries Board
15a Main Street,
Blackrock
Co. Dublin
T: (01) 278 7022
F: (01) 278 7025
E: info@erfb.ie
www.fishingireland.net





Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland

Our Natural Heritage

It should be noted that any waste recycling activities must not have a negative impact on the quality of surface waters and or salmonid habitats in the Ward catchment.

- 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.
- The EIS highlights poor water quality in the Ward system. EPA data collected in 2001 (subsequent to the data referenced in the EIS) has shown an improvement at two of the three EPA monitoring stations. Q3 was recorded at all three sites on the Ward in 2001. This improvement in water quality highlights the importance of comprehensive on-site surface water management in order to continue the protection/improvement of aquatic biological status both locally and downstream.
- The surface water monitoring programme should provide for a visual inspection of any discharges on a daily basis.

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

Yours sincerely,

Pat Doherty
Acting Chief Executive Officer

