

ORIGINAL

EPA Chan

BRENDAN PRICE

on

behalf of LORNA KELLY
& COMPLAINING RESIDENTS.

DUBLIN WASTE TO ENERGY PROJECT

E.P.A. ORAL HEARING

WILDLIFE BRIEF.

Environmental Protection Agency
 22 APR 2008
 ORAL HEARING
 RECEIVED

OH Sub No. 19 (A)

Recd From: Brendan Price

Brendan Price April 2008

B. Ag. Sc.

Council M. Biol. Int. Sch.

Furor Pro Biol

DIRECTOR Irish Seal Sanctuary

GARRISTOWN

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Co. DUBLIN

My NAME IS BRENDAN PRICE AND I'M A ¹
WORKING BIOLOGIST AND WILDLIFE REHABILITATOR,
WITH OVER 30 YEARS EXPERIENCE. I WAS ASKED
BY THE RESIDENTS TO COMMENT ON THE ECOLOGICAL
IMPACT ASSESSMENTS OF THIS DEVELOPMENT AND IT'S
POTENTIAL IMPACT ON WILDLIFE, ECOLOGICAL AND PUBLIC
HEALTH AND RAISE PERTINENT QUESTIONS. I WAS
THEREFORE SURPRISED TO FIND THE INFORMATION PRESENTED
BY DEVELOPER CONSULTANTS, PIECEMEAL, DATED, INACCURATE,
SELECTIVE (IN SOME CASES UNAVAILABLE TO E.P.A.) AND
MOSTLY DRAWN FROM PROTECTED AREAS BEYOND THE
DEVELOPMENT AND NOT FROM THE IMMEDIATE IMPACT ZONE.
THE PRESENTATIONS FOR THE DEVELOPMENT ARE MORE
CONCEALING THAN REVEALING AND PLAYING ON THE
PREMISE "WHAT THE EYE DON'T SEE, THE HEART (OR MIND)
WON'T GRIEVE". ON THIS REALIZATION AND THE CHAIR'S
REQUEST I NOW PUT THE CASE "THE ABSENCE
OF EVIDENCE IS NO EVIDENCE OF ABSENCE". I WILL
TRY TO FILL SOME OF THESE INFORMATION GAPS AND
PROVIDE AS REQUESTED BY EPA AND CHAIR CONTEMPORARY
REFERENCES AND RELEVANT SOURCES OF INFORMATION
FROM DIRECT IMPACT ZONE.
AS A HUMBLE WORKING WILDLIFE REHABILITATOR, I
WALK THE BAY AND THE WALLS REGULARLY. ALMOST
EVERY YEAR I PICK UP SEAL PUPS (INCLUDING NEW
BORN) FROM THE BAY. MY VETS, AS WOULD BE
EXPECTED FIND A DEGREE OF ANTIBIOTIC RESISTANCE
IN THESE AND IRISH SEA ANIMALS. EARLY CFB
WORK (EUGENE DIXON) FOUND ELEVATED LEVELS OF

- DIOXINS AND HEAVY METALS IN THE IRISH SEA. THE
DIOXIN SAMPLING POINTS IN ELEANOR MAYES BRIDGE (LARGE)
COME FROM OUTSIDE THE IMMEDIATE IMPACT ZONE. THE
BIOCIDES LEVELS PRESENTED BY DORTE RASMUSSEN (INCLUDING
CHLORINE/HYPOCHLORITE) DO NOT APPEAR TO GIVE TOTAL
CUMULATIVE LEVELS OR REACTIONS WITH ORGANIC MATTER
AND WHEN YOU CONSIDER SYNERGENIC CONCERNS AND THE
FACT THAT THE ENTIRE RIVER IS RECYCLED BETWEEN
THESE INTAKES, THIS DATA IS VITAL. IT RAISES THE
QUESTION, WHAT RESEMBLANCE THE RECYCLED RIVER,
HAS TO THE ORIGINAL AT ALL? MARINE FACILITIES
AND AQUARIA HAVE STOPPED USING CHLORINE/HYPOCHLORITE!
AS THIS HEARING PROCEEDS, A SEAL, MAYBE TWO, ARE
UP FEEDING ON AN OCCASIONAL SALMON AT THE FISH
COUNTER/PASS AT ISLAND BRIDGE, YET ALL THE CONTRIBUTORS
CULMINATING WITH JOHN BROPHY HAVE SAID THIS IS
NOT A SALMONID RIVER BUT THERE ARE SALMON IN
IT! ACCORDING TO NAS'CO, MARINE INSTITUTE, CFB
AND ERFB, THIS IS A VERY IMPORTANT SALMON
RIVER, ACCORDING FURTHER STATUS BY D.C.C.'s
OWN BIODIVERSITY PLAN, C.O.R.D., W.F.D., HABITATS
DIRECTIVE et al AND MUST BE RESTORED TO
SALMONID QUALITY. THE ERFB DO NOT AS
JOHN BROPHY SAYS SUGGEST, RATHER STATE (IN
DOCUMENTATION THAT HAS NOT BEEN PROVIDED E.P.A.)
"ALL MEASURES NECESSARY SHOULD BE TAKEN TO
ENSURE PROTECTION ... BY COMPLETE IMPACT
AVOIDANCE" etc, THIS INCLUDES THE 27
OTHER SPECIES OF ESTUARINE FISH PRESENT
TO SAY NOTHING OF OTHER FAUNA AND FLORA AND

ECOLOGICAL INTEGRITY, NEITHER IS THE OTTER MENTIONED, DIVERS, GRAYS, MINGAUER IN THE CHANNEL FEEDING. ALL THIS INFORMATION IS AVAILABLE FROM N.P.W.S. AND BIRSWATCH IRELAND, WITH WHOM NO FORMAL CONSULTATION TOOK PLACE! A BABY PORPOISE DIED AT THE TOLL BRIDGE C. 3 YEARS AGO; AN ADULT CORSE WAS EXAMINED BY MYSELF ON S. SIDE OF POOLBEG CHIMNEYS 2 SUMMERS AGO AND THEY ARE PRESENT THROUGHOUT THE YEAR IN THE BAY (PERS. OBSERVATIONS). THEIR PRESENCE IS REGULARY RECORDED BY IRISH WHALE & DOLPHIN GROUP AND A JOINT STUDY BY NPWS / IWDG, IS IMMINENT. THESE SPECIES HAVE BEEN DISMISSED OR OVERLOOKED IN THE SUBMISSIONS.

AS TO THE THERMAL PLUME AND ICONIC SALMON ET AL, THIS WORK HAS NEVER BEEN DONE TO SATISFACTION AND DR KEN WHELAN (NASCO + MARINE INSTITUTE) ADVISE WOULD BE TO REQUEST A SPECIAL SCIENTIFIC STUDY IN THIS AREA. THE CONSULTANTS FAILED TO ANSWER THESE QUESTIONS; THEIR CONCLUSIONS ARE BASED ON POOR + DATED DATA OFTEN IRRELEVANT TO THIS DEVELOPMENT. THE MODELLING (MIKE 3) IS OBVIOUSLY FLAWED AS THE THERMAL PLUME BY SIMPLE CALCULATION EITHER SPANS THE RIVER OR THERE IS A PARTING OF THE WATERS! THE EFFECTS OF TIDAL SLACKS ARE NOT BUILT INTO THE MODEL; THE MOVING PICTURES ARE AT VARIANCE WITH THE FIGURES AND BOTH ARE AT ODDS WITH THE REALITY OF A RECYCLED RIVER, WERE THIS TO BE ALLOWED, I HOPE THIS IS OF ASSISTANCE TO E.P.A. AND WOULD SUGGEST

Any Degree Of Precaution At All, Would (4)
Require At Least 12 Months Of Monitoring
Prior To Any Development, Not Random
Sampling Within A 12 Month Period. The Character
Of An Estuary And The Living Organisms Within It
Or Using It Requires This. The Effects Of
This Development (The Spikes, The Stratification, The
Compression Effect) Could Destroy The Unprotected
Area For Ever, With Consequent Impact On The
Protected Areas. I Do Hope You Will Consult
Further With Marine Institute; C.F.B.; E.R.F.B.; N.P.W.S.;
I.W.D.G.; Bird Watch.

Signed

Brendan Price

Brendan Price,

21/4/2008

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