



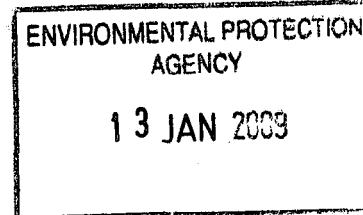
Eastern Regional Fisheries Board
 Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
 Our Natural Heritage

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

Sub ①



Your Reference – W0251-01
 Our Reference – BB/DD/01

January 12th, 2009

Re: Waste Licence Application, John Morrin, Eadestown, Naas, Co. Kildare.

Dear Mr. Reilly,

In relation to the above waste application, please find below a list of the Board's observations:

- The development is located within the catchment of the River Liffey, one of the foremost salmonid fisheries in this region. Surface waters from the proposed development area potentially drain directly to the upper River Morrell (located on the site), one of the most productive tributaries of the R. Liffey in this area.
- The River Morrell is exceptional among most urban rivers in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout in addition to resident Brown trout (*Salmo trutta*) populations. This highlights the sensitivity of local watercourses and the Liffey catchment in general. Fishery habitat is regarded as particularly good for all salmonid life stages throughout much of the Liffey system. Only clean, uncontaminated water should leave the site and drain to the river network.
- The potential for pollution of surface waters from both suspended solids and hydrocarbon elements and groundwaters (from landfilling activities) is significant. Drainage principles (including SUDS strategies) as outlined in the Greater Dublin Strategic Drainage Study (GSDSDS) should be incorporated. Best practice should be implemented at all times in relation to any activities that may impact on riverine or riparian habitats. Any discharges to surface streams present on the site must not impact negatively on the salmonid status of the system. Comprehensive surface water management measures must be implemented at the construction and operational stages. On-site attenuation ponds should allow for the settlement of fine/particulate materials out of potentially discharging surface waters. Petrol/oil interception (and possibly hydrobrake controls) should be in place on primary surface water discharges to protect receiving freshwaters in terms of water quality (and possibly

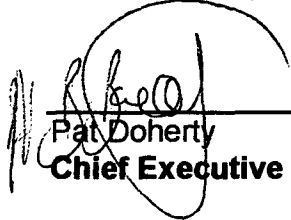
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quantity if flooding is an issue, although beyond the remit of this authority). Silt fencing of discharge streams would also be recommended during construction.

- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (<http://www.fishingireland.net>) be consulted when planning to undertake works on this site. The maintenance of habitat integrity (both instream and riparian) is essential in safeguarding the ecological value of this important urban natural resource. Any works directly affecting watercourses or riparian habitats in the area must first be submitted to the Board for assessment and approval.
- Weekly and preferably daily visual inspections of storm water would be recommended for inclusion in the licence conditions.
- Surface water biological monitoring is recommended at both the upstream and downstream extents of the site on the Morrell to account for any potential impact from local activities.

Yours sincerely,


Pat Doherty
Chief Executive Officer

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