Environmental Protection Agency 2 3 JAN 2013

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21 January 2013

The EPA,
The Office of Climate, Licensing & Recourse use.
PO Box 3000.
Johnstown Castle Estate.
Co. Wexford.

Re: Dublin City Council plan to dump tunnel spoil in Dublin Bay.

Dear Sir/Madam,

I am absolutely flabbergasted at the plans of the Dublin City Council's (DCC) plans the dump the spoil from their sewage tunnel into Dublin Bay. How could anyone, in this day and age, propose such a project?

Have they learned nothing about the health of the bay? Have they not spent countless millions treating Dublin's sewage and very successfully too. The bay has, at last, been cleaned up after years of abuse. Swimmers can now use Dollymount and Sandymount strands again, the water visibility is at last good, the sea floor is finally clear of disgusting silt. As a consequence of the clean water shellfish (king and queen scallops) are starting to return to the bay and, maybe, the bay will again become the great plaice fishery it was in the nineteen sixties when I trawled out of Dun Laoghaire..

I started scuba diving in 1962 and have dived almost ever year since. When I started the bay was very clear and a very pleasant place with clear water and many fish. Over the years, through neglect, the water quality slowly deteriorated until it got to the stage where the sea floor was covered with a sludge and small pieces of paper (I will leave it to your imagination what that was). The treatment plant at Ringsend has worked wonders; the sea floor has been cleaned up so that it is now as clean as the west coast. Underwater photography is now again possible around Sandycove and the Muglins. I am coming to the end of my diving career, I am seventy seven next month so these plans will probably not affect me, but I feel for my friends who will continue trying to dive the bay.

What really puzzles me is the lack of joined up thinking between the Government and local government, not unusual I suppose. I quote from the Irish Times.

"Monday, December 3th – Jimmy Deenihan TD, Minister for Arts, Heritage and the Gaeltacht, has today proposed six new marine sites for designation as Special Areas of Conservation (SACs) to protect marine habitats and species listed on the 1992 EU Habitats Directive." One of these areas covers both the sewer outfall area and the dumping of the tunnel spoil area "Rockabill to Dalkey Island Reefs and Harbour Porpoise"

How can the DCC propose dumping spoil in an area that is to be designated as a "Special Area of Conservation" or do they not care? I believe that the spoil consists mostly of limestone dust which will react with sea water to product a white milk-of-magnesia like substance turning the water opaque. The spoil not absorbed by the sea water will spread over the sea floor covering it with a fine silt destroying all life.

I do not object to the DCC from improving their sewage treatment plant but there must be a better way. Apparently the spoil cannot not be used for building or construction, because of excessive dust and pyrites, so it must be dumped at sea. If so, why not dump it beyond the offshore sand banks where the tidal currents will distribute it over a wider area and not be trapped in Dublin by those same sand banks. That is only one suggestion but there must be many ways to use what could be a valuable resource for harbour works or land reclamation.

This is why I am turning to you to object to the granting of planning permission and to prevent the DCC from destroying Dublin Bay. With some rational thought applied to the problem, with a more long term view, there must be a better way.

Written in desperation, I remain

Yours sincerely,

John Hailes,

National Diving Instructor, Irish Underwater Council.

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