

Noeleen Roche

Subject: FW: FAO Noeleen Roche RE: S0007-02 / E00021/2015 - Kerry County Council (Fenit Harbour)

From: Manager Dau [mailto:Manager.Dau@ahg.gov.ie]

Sent: 30 April 2015 17:08

To: Wexford Receptionist

Subject: FAO Noeleen Roche RE: S0007-02 / E00021/2015 - Kerry County Council (Fenit Harbour)

Your Ref: **S0007-02**

Our Ref: **E00021/2015**

Environmental Licensing Programme
Office of Climate, Licensing & Resource Use
EPA, PO Box 3000
FAO Noeleen Roche, Programme Officer
Johnstown Castle Estate
County Wexford

Re: Dumping-at-sea scoping, Tralee Bay, Co. Kerry

A chara

On behalf of the Department of Arts, Heritage and the Gaeltacht I refer to the consultation received in connection with the above-referenced case.

Outlined below are the heritage-related observations/recommendations of the Department under the stated headings.

Nature Conservation

Marine Science and Biodiversity

The letter that has been forwarded to the Department of Arts, Heritage and the Gaeltacht gives some detail in relation to the business operations associated with the EPA application and notes some data that would be/has been collected as part of the generation of an application for consent. It has previously been requested that information related to the potential interaction with marine mammals be included in a subsequent application for consent. It does not appear that this information is available currently on the EPA website. For the sake of clarity the following should be included in the assessment:

A baseline description of the presence of marine mammals must be included as part of the submission. The applicant may find useful resources on <http://www.npws.ie/marine/marinereports/> specifically in relation to seals and cetaceans using the surrounding waters. Useful information is also available from the website of the Irish Whale and Dolphin Group (www.iwdg.ie). The presentation of data related to marine mammal species must be of sufficient resolution to predict the likely interaction with marine mammal species over both a spatial and temporal scale. Records of survey should include the months when sampling occurred and the numbers of animals encountered in the vicinity of the proposed development this may be required to supplement existing data sources. Such an assessment should include scientifically supported consideration of potential impacts from the operation of associated vessels/plant, incorporating as appropriate:

- The identification, where appropriate, of measures required to mitigate such impacts.
- It is recommended that a suitably qualified marine mammal ecologist should be involved in undertaking relevant assessments.

Some useful information related to noise producing activity in the marine environment is contained in a document recently published by this Department (<http://www.npws.ie/marine/bestpracticeguidelines/>)

Archaeology

Underwater Archaeology

The Department has considered the Underwater Archaeological Assessment Report (UAIA) as submitted by Laurence Dunne Archaeology Ltd.

Further Information is required on the details of the geophysical survey and we therefore request the following be forwarded to the UAU for considerations:

- A map showing the survey lines and track plots across the Dump Site
- Map with results of geophysical survey shown, including mosaic of sidescan survey
- Map with identified anomalies geo-referenced and plotted on it and overlaid on the Dump Site location

The Department further notes the images of the anomalies as submitted in the UAIA. At least two of the anomalies have the potential to be cultural in nature –SS11_1 & SS18_1. These shall be the focus of archaeological dive inspection to assess their nature and extent. A selection of the other anomalies shall be inspected at the same time to determine their nature and extent and if they are natural or cultural in form. The archaeological dive inspections shall be carried out by a suitably qualified underwater archaeologist and shall be licensed to this Department under the National Monuments Acts, 1930-2004. A report on the underwater archaeological dive inspection shall be submitted to the Department's Underwater Archaeology Unit (UAU) for consideration before any decision is taken on this application.

To note: From the documentation submitted to the EPA that a separate Foreshore Licence is to be applied for with regard to the dredging operation. The UAU shall have recommendations in this regards, by way of archaeological monitoring of the dredging works to be carried out by a suitably qualified underwater archaeologist. We will submit detailed requirements to the Foreshore Licence application when it is submitted.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

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