

Grainne Power

Subject: FW: Sligo Dumping at sea submission from IFI
Attachments: Sligo Dumping at Sea IFI.pdf

From: Barry Kelly [<mailto:Barry.Kelly@fisheriesireland.ie>]
Sent: 06 August 2015 13:06
To: Wexford Receptionist
Subject: Sligo Dumping at sea submission from IFI

Hi,

I've attached a submission from IFI on a permit application from Sligo County Council regarding dumping at sea (S0023-01). I apologise that it took me this long to get it to you but I hope it can be included in the decision making. I have put it in the post today also.

Kind Regards,

Barry

Barry Kelly
Acting Fisheries Environmental Officer
Inland Fisheries Ireland - Ballina

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Reg No: S0023-01

31 July 2015

Environmental Licencing Programme
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford.

Re: Dumping at sea permit application from Sligo County Council

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is the state body responsible for the protection, management and conservation of inland fisheries and the sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. In relation to the above application for a dumping at sea permit, IFI would like to make the following comments:

It is understood that this application is regarding the disposal of 250,000 cubic metres of dredge material from capital and maintenance dredging at the Sligo Harbour Shipping Channel to an offshore dump site in outer Donegal Bay approximately 34 nautical miles (63 km) north west of Sligo Port and approximately 17 nautical miles (31.5 km) south west of Malin More Head. The proposed dump site is located in approximately 90 metres of water.

Hydrodynamic modelling undertaken as part of the study to investigate the impact of the dumping operation on sedimentation and suspended sediment loads in the area of the proposed dumpsite concluded that there should be no significant impact to water quality or fisheries interest outside of the immediate vicinity of the dump site itself. "The majority of the dumped material will be deposited and remain within 2 kilometers of the dump site and only a small amount of material will be transported further off shore by residual current. Some material will migrate towards the east under the influence of tidal action, but all particles will settle within 5.5 km of the dump site".

It is noted that no mitigation is possible to reduce the extent of the affected areas, however the Natura Impact Statement describes the significance of this impact, and concludes that as the impacts are temporary in nature with recolonisation occurring within a year, there is no significant impact arising from the deposition of the dumped sediments.

The proposed dump site area provides limited potential for recreational sea angling due to its distance offshore and there will be no impact on commercial salmon fishing as drift netting for salmon has ceased since 2007. After reviewing all associated reports and documentation accompanying this application and considering the dump sites location offshore and depth of water involved, IFI has no objection to this dumping at sea permit application.

Maintenance and Capital Dredging Programme Comments

IFI would like to restate its concerns in relation to the dredging operation itself. IFI provided a submission on the foreshore licence application made by Sligo County Council for the maintenance and capital dredging of Sligo Harbour. IFI is obliged to protect the species under its legal remit and must view the proposed dredging maintenance programme in the light of potential impacts to fish and fisheries habitat. Inner Sligo Harbour is classified as having "Good Ecological Status" in the Western River Basin Management Plan and the outer harbour is classified as having "High Ecological Status". These statuses must be protected.

The adjoining Lough Gill SAC is of considerable importance for the presence of four Red Data Book fish species that are listed on Annex II of the E.U. Habitats Directive - Brook Lamprey (*Lampetra planeri*), River Lamprey (*Lampetra fluviatilis*), Sea Lamprey (*Petromyzon marinus*) and Atlantic salmon (*Salmo salar*). The three migratory species of the above – salmon, river and sea lamprey use the Sligo Harbour navigation channel during migrations to and from Lough Gill SAC. This issue of migratory fish passage is of particular concern and IFI are concerned there may be periods when it would have issues with maintenance dredging being continued. Of particular importance is the downstream migration of salmon smolts that occurs primarily in the March-May period in Irish rivers. IFI would have conservation issues in regard to salmon, should low freshwater flows in the Garvogue River coincide with ongoing dredging in the navigation channel and the downstream migration of salmon smolts through Sligo Harbour into a zone of elevated suspended solids. The Garvogue estuary is relatively short and salmon smolts are required to modify their metabolism in moving from freshwater to an increasingly saline environment. A further pressure in the form of elevated suspended solids may be problematic for the species. Salmon stocks have improved in the last couple of years in Lough Gill. Restrictions have been lifted on anglers and IFI aim to maintain this improvement in salmon stocks into the future.

A further migratory species *Anguilla anguilla* (European Eel) is present in the Lough Gill system. Having undergone a sharp decline in recruitment from 1980, European eel is now listed as critically endangered on the International Union for Conservation of Nature Red Data List. European eel use the navigation channel area during migrations to and from their distant breeding grounds. All possible measures should be taken to minimise disturbance to this species during migration through the estuarine environment as the next classification level in the Red Data List is "extinct in the wild".

Monitoring Programme

IFI welcomes the proposals to undertake monitoring in regard to Suspended Solids and dissolved oxygen levels during the dredging process as provided for in Section 6.8.1.1 of "Assessment of impact on the environment: impacts on fisheries".

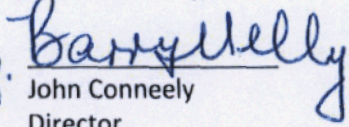
Dredging methods and mitigation measures

Apart from prohibiting dredging in the March – May period, one option to be considered would be to impose a prohibition on dredging within the entire narrow channel area from the current waste water treatment works upriver to the upstream extent of works during the March – May period. Descending smolts would have an expanse of tidal water in which to reside that would have limited suspended solids pressure. Whatever excavation method is used to remove sediment from the area of maintenance, the material removed is placed into barges for removal off-site and subsequent disposal. The material excavated will contain a high volume of water and as the barge is filled, overspill of water back into the channel will occur. This is commonly accompanied by high levels of suspended solids washing out. Use of back hoe dredger will reduce the volume of water

going into the barge. A strategy that allows filling of barges with bed material while reducing the amount of suspended solids spilling out with the decanting water will reduce the levels of suspended solids to the aquatic environment.

Undertaking maintenance during periods of low tide may also contribute to management of suspended solids with dispersal focused into the fairway and reduced escapement into the wider estuarine area. This is of benefit to juvenile life stages of a range of estuarine/marine fish species whose young stages use the estuary as nursery waters. The young fish disperse onto the sand flats previously exposed at low tide, to feed with the filling tide. Reduction of suspended solids dispersal during the flowing tide would provide further protection to these juvenile fish assemblages.

Yours Sincerely,

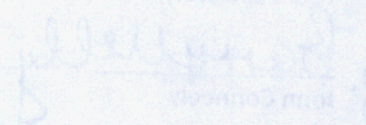

pp. John Conneely
Director

Epa-DAS-0715

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being into the paper. A strategy that allows filling of boxes with lead means that the amount of suspended solids falling out with the dusting water will reduce the level of suspended solids in the spent water.

The same principle during periods of low flow may also be used to manage the suspended solids with respect to lead. The lead will be reduced to a level that will be within the limits of the water. This is of benefit to lead in the water in terms of reducing the amount of lead that is being added to the water. The lead will be reduced to a level that will be within the limits of the water. The lead will be reduced to a level that will be within the limits of the water. The lead will be reduced to a level that will be within the limits of the water.

Yours Sincerely,

Mr. Mark Conroy
Director
EPA

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