

Subject: FW: FW: Port again !

From: Brendan Price [redacted]

Sent: 17 August 2015 22:12

To: Media; Wexford Receptionist; complaints@epa.ie

Subject: Fwd: Port again !

FAO: EPA.....ISS shares divers' concerns and below some observations and comment made for BP et al.

P.S. I certainly do wish Rush Sewage complaint pursued also Ref:870, and not all happy with response. The discharge is ongoing criminal action on daily basis and unsatisfactory to be referred to offenders, I.W.A and Fingal Coco.....

Regards Brendan

Please see references in submission below re; spoil removal and dumping

ABR and RFI.....Dublin Port Development Impact on seals and other creatures??? Data deficits ?????

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The NIS, EIS, Avian Impact Assessment, Marine Mammal Impact Assessment et al are extremely confined by their scoping (Dublin Port, Shipping Channel and Dredge Disposal Site), as though a line could be drawn around the development and beyond it unaffected by plume, sediment transportation, silting, accretion, turbidity, light dilution with knock on effects for re-colonisation, recovery of benthos, fish nurseries and up the ecosystem. The experts consulted as much as agree with this and point to the limited survey data and timeline throughout. For the marine mammals this is greatly understated. If a line indeed was to be drawn, it should encompass the UNESCO site, SPAs and proposed MPA. Bord Pleanala (BP) are correct to seek further information and indeed the responses still fail to address data deficits. This development is not confined by the Liffey Walls and spoil site but at the heart of the 3 estuaries and Bay, all of which will be affected by the outfall and limited mitigation measures.

As to the seals, the Irish Seal Sanctuary(ISS) though cited, was not invited to contribute. Statements such as,"There are only a relatively small number of seals that regularly use Bull Island as a haul -out" and development "will have no long term, significant adverse effects" on seals et al. can not be cited as fact when in the 1st instance both species are observed all year round and with pups present and in the latter ongoing observations of disturbance demonstrate how flighty they can be. It would be highly significant, were they to disappear from the Bay or any part of it. The snap shot sightings and observations cited in the studies are no substitute for year round monitoring and at variance with the experience of year round observers. This is reflected in the consultants recommendations for ongoing monitoring and the baseline, pre-works needs be established in first instance.

The presence and activity of seals in the Bay is year round and they are a highly significant , mixed colony, recorded from the time of the Rotschild reports a century ago. Dalkey Island holds the first recorded remains of Grey Seals (World's 1st Protected Species)for Ireland. The seals are a year round ,long recorded presence....feeding, breeding and hauling out, very vulnerable to disturbance and further loss of habitat. They are highly significant residents of UNESCO site, only one of it's kind within confines of capital city and linked to the greater Dublin Bay community. Any disturbance must be regarded with concern, closely monitored and subject to review and mitigation. It is significant the dredging schedule fails to note their October to March breeding season and presence of growing pups, whose mortality is highest in this period. Sea going smolts are noted but not returning salmon or presence of lampreys. It is incorrect to dismiss the seals as a small, part time presence in the Bay arising from insufficient survey and monitoring.....absence of evidence is not evidence of absence and you will find the experts and NPWS agree with me on data deficiency and I heartily concur with them on their recommendation for Marine Mammal Observers (MMOs) and would propose this be increased year round (not just during works but for recovery periods also) to extend to a full time ecologist for the lifetime of the project with additional conservation rangers in each L.A. area. In budgetary terms this is minuscule and is the least acceptable level of monitoring and mitigation....

I have adressed my observations largely at the seals, in some ways perceived as robust and resilient residents of the Bay, fragile in others....and as indicator species of benthos, water quality, disturbance etc. they certainly merit closer consideration and monitoring. The risks they highlight and adequacy of mitigation measures to be tested, further underline their importance.

The EIS, NIS and associated wildlife "studies" are disjointed , stand alone, expert opinions.....informed and valuable in their own right, the report fails to adopt an ecosystem approach to ABR or respond adequately to BP's RFI or mine. The Precautionary approach would indicate further information and better mitigation/contingency planning required.

As a footnote I'd add the Divers concerns for turbidity and safety raise many similar concerns, from which to extrapolate. Wildlife, recreational users and residents would appear under represented in this process.

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The author has 30 years experience of seals and long association with Bull Island and Bay population

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