

Noeleen Roche

From: Licensing Staff
Subject: Submission No 478 Martin Clynes

From:
Sent: 27 August 2015 22:55
To: 'licencing@epa.ie'
Subject: Dublin Port application for licence to dump dredged material - S0024-01 13/07/2015

50 kincora Grove
Clontarf, I
Dublin 3

27 august 2015-08-27

To: EPA

As a regular swimmer and walker in and around North Bull Island, and as a professional biologist with an interest in wildlife, marine life and the environment, I am writing to express concern about the proposal from Dublin City Council (S0024-01, 13/07/2015) for large scale dredging in Dublin Port and for dumping the dredged material off the nose of Howth

First of all re dredging - most people accept the need for development of the port to give better access to Cruise ships etc, and I am not objecting to this per se
However the dredging will inevitably cause short- to medium- term deterioration in water quality with associated hazards for swimmers, marine life, and birds, and EPA should require regular monitoring which should in turn feed into the RATE at which the dredging work is done

More importantly, the site of dumping is a major cause for concern.. Dumping in this region has previously resulted in substantial silting along the south side of the North Bull Wall, and onto the Bull Island itself, and the lagoon between the Bull Island and the mainland. Dumping should occur much further out and careful analysis of currents and final destination of the silt needs to be undertaken to minimise effects on amenity for humans and impact on birds, marine mammals and fish, and also shellfish and the general marine ecosystem. The levels of heavy metals and other toxins in the dredged material also requires consideration and monitoring – I suspect we are talking about something midway in the spectrum between river mud and toxic waste

Any careful reading of Dublin Port's submission, and their cavalier dismissal of possible health, safety and environmental effects therein, should sound alarm bells for the EPA - it is certainly causing concern across a broad spectrum of those who use the bay and its environs

I ask the EPA to please read the Dublin Port submission carefully and critically, and to look for evidence and data to support their assertions and proposals.

.. It seems to me that they have prioritised cost cutting over considerations of human health and safety, the amenity value of the Bay, and impact on the marine environment, flora and fauna

Nobody wants to block reasonable development, but we rely on EPA to balance this with due regard for proper anticipation of consequences of dumping in a particular location, for human health and for the environment

Yours sincerely

Martin Clynes B.Sc, Ph. D

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