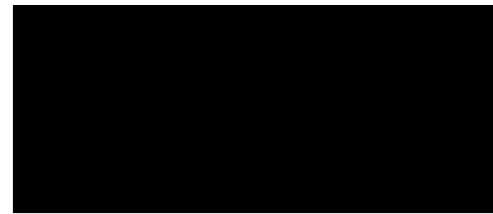


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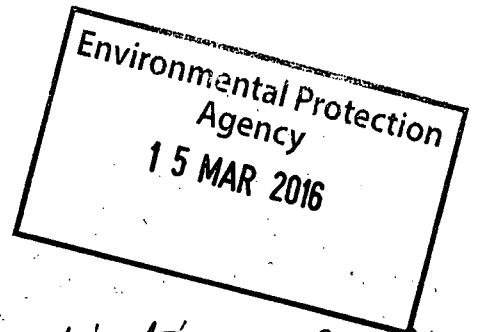


& MERRION RESIDENTS
ASSOCIATION
founded 1963



12/3/2016.

To: Office of Environmental Sustainability,
EPA Headquarters,
Johnstown Castle Estate,
Co. Wexford.



Re. Dumping at sea permit application no. S0024-01

Dear Sirs,

The revisions to the Natura Impact Statements lodged by the applicants in sections 2.1.2.1 are mainly concerned with the manner of disposal of class 2 sediments in CAD cells (Confined Aquatic Disposal) at the site west of the Burford Bank - 6 cells in all.

Basically the proposal seems to be to construct a series of sub-aqueous berms to contain the contaminated dredge material for initial capping with fine sand & subsequently with coarser material.

A report by Craig Vogt of 2009 refers to the need to allow a consolidation period for deposited class 2 dredge material of at least 140 days before capping can take place. There would presumably be an additional time interval before permanent capping occurs with heavier material, and the next cell is in use.

- Is it proposed to cap the cell/s during the dredge period of October to March?
- If uncontaminated dredge material is to be used for capping how is the order of dredging to take place?
- On page 6 of the additional information, reference is made in para. (6) to capping with fine sand in the event

of storm forecasts with locally available material. Is it proposed to store quantities of fine sand for such an eventuality?

d) Is dumping of uncontaminated material to take place at the site beside the CAD cells prior to final capping of the separate cells?

Regarding cumulative impacts & extended duration of dredging and dumping associated with the number of proposals in Dublin Bay, it is difficult to ascertain for how many years there will be sequential winter, summer, winter dredging & dumping.

e) Are different areas of the disposal site to be allocated separately to each of the proposals?

We note that the case studies referred to on page 5 refer to projects in totally different settings & that some are in connection with construction of artificial islands or reclamation projects.

In the context of the overall ecosystem of Dublin Bay we consider that the timescale of the recolonisation of affected areas to be of considerable impact.

Yours sincerely,

Lorna Kelly, P.P. SAMRA.

P.S. (I apologise for hand writing this - the computer has just gone down!)