



20 September 2017

Our ref: NMS Response Kilrush Marina dredging & dumping 2017
Your ref: S0020-02

Ms Ciara Maxwell, Inspector, Office of Environmental Sustainability, Environmental Protection Agency

Re: Application for Dumping at Sea Permit for dumping of dredged material in the outer navigation channel for Kilrush Marina by L & M Keating Ltd., Kilrush, Co. Clare.

Dear Ciara,

Thank you for emailing us on the application. Below are the comments and requirements of the Underwater Archaeology Unit of the National Monuments Service in regard to this application.

We have had long dealings with this application and note the Underwater Archaeological Impact Assessment (UAIA) by Geomara as submitted with the Dumping at Sea Permit application. This is a desktop study and recommends the following:

- Geophysical Survey to be carried out for archaeological purposes of the areas to be the subject of dredging and for dumping the dredged material.
- The geophysical survey to comprise side scan sonar, magnetometer, sub-bottom profile imaging.
- Any identified potential cultural material to be the subject of further archaeological mitigation.

A geophysical survey assessment report carried out by Geomara was submitted to the UAU in February 2016 for the inner harbour, and primarily in regard to dredgings for a proposed reclamation area within the main marina, inside the lock gates. It was our understanding thereafter, that dredgings in that area were not taking place.

Neither geophysical survey nor subsequent underwater archaeological diver inspection of identified anomalies appears to have been done for the main navigation channel or approach, which is the area relating to this current application for a Dumping at Sea Permit. The following therefore are the requirements of the UAU, and shall be included as a Condition of any Permit granted.

Archaeological Requirements:

If a geophysical survey has been done, for archaeological purposes, of the area that is the subject of this application, it shall be submitted to the UAU for consideration and further comment in advance of any dredging or dumping taking place.

If one has not been done, then the applicants shall engage the services of a suitably qualified archaeo-geophysicist to undertake a detailed and comprehensive geophysical survey of the areas to be dredged and to be the focus of Dumping at Sea. This shall involve:

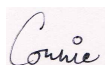
- Application for Detection Device Licence with detailed associated Method Statement.
- Geophysical survey comprising: Multibeam survey, side scan sonar survey, magnetometer survey and sub-bottom profile survey.
- The Geophysical Survey shall be carried out to the specifications and resolution for the detection of underwater cultural heritage; it shall ensure 20m spacing with full overlap, full mosaic and overlay on the marine charts; data shall not be slant corrected.
- The full raw data shall be interpreted by a suitably qualified archaeo-geophysicist experienced in the interpretation of such data for archaeological purposes.
- A detailed report, to include the Desktop study previously undertaken and the full results of the geophysical survey shall be submitted to the UAU for consideration and further comment. The report

shall also make recommendations for further archaeological mitigation if thought necessary (i.e. for any anomalies identified).

Neither dredging nor dumping of material shall take place until this Department has had the opportunity to consider the submitted Further Information and make formal comment on same.

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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Dr Connie Kelleher
Underwater Archaeology Unit
National Monuments Service
Department of Culture, Heritage & the Gaeltacht
Room G19, New Road
Killarney, Co. Kerry

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