

We refer to the rewetting of Ummeras Bog, Monaterevan Co. Kildare that also sits on the Offaly border.

As you are aware, Bord na Mona plan on rewetting 80,000 acres of bog across the midlands in partnership with the EPA.

There is widespread uproar, anger and fear about this project.

The EPA are responsible for ensuring that Bord na Mona satisfy the requirements of their licence.

I will refer again to the EPA information booklet.

There has been no communication from Bord na Mona. The plans clearly acknowledge there will be damage done but they have a carry-on regardless attitude.

The IFA and ICMSA, two of the country's largest farming representative bodies met with the Joint Oireachtas Committee yesterday, 1st March 2021 to discuss the matter and the outcome was there are a lot of unanswered questions.

The EPA need to get involved at this point. Bord na Mona have refused to put anything in writing.

By way of proving my point, I will direct you to the rewetting of Umeras bog. A bog that is completely unsuitable for rewetting

We do not have any issues with rewetting in general when located in the correct and suitable location, however, we have serious concerns regarding the rewetting of Umeras bog based on the fact that it is a completely unsuitable location and the disastrous implications this will have on our property.

This assertion is based on the information taken from the advice of a Hydrogeologist, an Environmentalist, from a booklet submitted by the Department of the Environment, Heritage and Local Government and a second booklet from the Department of Agriculture, Fisheries and Marine.

In a conversation with Joe Ryan of Bord na Mona December 2020, it was agreed that Bord na Mona have a right to carry out rehabilitation on their properties, as long as it did not negatively impact on surrounding properties.

Bord na Mona have been made acutely aware of the damage the rewetting of this bog will have on our property, livestock and farming practices and the dangers that wetlands can pose to the community and to the wildlife that inhabit the area.

Please confirm in writing that Bord na Mona, are knowingly prepared to assume all responsibility and risk associated with the rewetting of Umeras bog.

Brief description

Umeras bog directly adjoins 5 farming properties, Coillte mature woodland and 60 acres of privately owned mature woodland and 30 privately owned turf bank properties on the Umeras side alone.

The bog site is higher than the surrounding properties and there is a downward slope, towards Quinnsboro road where there are 6 houses directly adjacent to the properties that do not satisfy set back distances

At the Northern end of the site, on the Clonbrin road, there are also several houses that do not satisfy setback distances.

In relation to our property, the high bog runs along the Northern area of the site and along the eastern side to Quinnsboro.

From initial conversations with Joe Ryan of Bord na Mona, it was understood that the high bog would not be rewet.

If the high bog is rewet, our property would be affected from the bottom of our property and from the side.

Half our property could be under water for much of the year.

It is noted in the plans that the high bog is '*ecologically and hydrologically linked*' to the private turf banks. The turf banks run parallel to our property separated only by our small, agricultural lane private right of way. Our property is also '*ecologically and hydrologically linked*' to the Bord na Mona site. If Bord na Mona anticipate damage to the privately owned turf banks, they are very much aware that our property will also be affected.

Karst Limestone areas have a high risk of hydraulic leakage. Water cannot be controlled underground.

We strongly oppose the rewetting of the high bog.

On the advice of an independent Hydrogeologist, Umeras bog has been identified as an unsuitable location for a wetlands.

There is also a booklet available online supporting this conclusion which I will refer you to.

Site Restrictions as per the Department of Agriculture, Fisheries and Food

1.A proposed ICW shall not be considered for: Sites where the minimum design requirements (Clause A.4) cannot be achieved

This refers to areas where there is a high risk of hydraulic leakage for example in karst limestone areas and areas known to collapse ie. Umeras bog

2 Sites within 60m up-gradient of any well or spring used for potable water

I would suggest that the houses directly adjacent the Bord na Mona entrance would not satisfy this requirement and a Hydrogeology assessment would be necessary here

3.Sites within the inner protection zone of a public groundwater supply source, where the vulnerability rating is classified as extreme.

Yet to be determined by a Hydrogeologist

4.Sites within 300m up-gradient of a public supply (>10m³ /day or >50 persons)borehole, where an inner protection zone has not been identified

I would suggest the private dwellings located on the bog to the North of the site would not satisfy this requirement. Yet to be determined.

5.Sites where construction of the ICW may negatively impact a site of natural heritage value without carrying out an appropriate assessment as required by the Habitats Regulations

6.Sites where construction of the ICW may negatively impact a site of cultural heritage value

7.Sites within 25m of a dwelling.

I would suggest that this requirement is not satisfied. Yet to be determined.

8. Sites within the crown area of mature tree root systems

If the high bog is rewet, Coillte woodland which is located directly at the edge of the high bog would be exposed to Ammonia toxicity. As of January 28th 2020, Coillte had not been contacted by Bord na Mona in relation to this risk.

A private woodland owner also has woodland at the edge of the bog, and this would also be exposed to Ammonia toxicity.

9. Sites underlain by karst Limestone, where the possibility of collapse cannot be ruled out

As described in the Bord na Mona plans, the majority of the underlying geology at Umeras Bog is dark limestone and shale, with the southern and eastern tip of the bog underlain by limestone and calcareous shale. The bog has a history of moving and countless cattle have been lost to sinkholes.

10. Sites where adequate land area is not available

75% of Umeras bog is identified as 'bare peat' and of 'low ecological value'. The remaining 25% refers to the high bog and we strongly oppose to the rewetting of the high bog. However, it is described as 'moderate value' because of the habitats that are present. Where Bord na Mona expected to find sphagnum moss, none was found. There are no environmental or bio-diversity benefits to rewetting Umeras bog.

11. Sites within 15m of a karst feature Sites in close proximity to a watercourse (no less than 10m from the initial and second ponds and no less than 5 m for subsequent ponds).

12. Sites that cannot be adequately protected from flood damage.

Umeras bog is expected to have a high-water table when rewet. The bog is already higher than the surrounding lands with a downward slope. The surface of the bog is Limestone open to erosion, cracks, fissures, collapse, and sinkholes. Water cannot be controlled on this surface.

I am very aware of the assurances given to the IFA and I would like to draw your attention to an assumption made by Bord na Mona in the plans that I presume would be common to all the plans throughout the midlands.

Could Bord na Mona please clarify what is meant by the following:

'no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land'. This is followed by *'it is a key assumption that it is expected that weather conditions will be within normal limits over the rehabilitation plan timeframe. Long periods of wet weather have the capacity to significantly affect ground conditions and constrain practical ground interventions.*

From a legal perspective, this infers that Bord na Mona are aware of the damage that will be done to properties. It could be assumed, that from reading the above, if the weather gets any wetter than it is now, (and Ireland is getting wetter every year), it would appear that Bord na Mona will not take any responsibility for damage done to properties as it will fall outside the scope of their responsibility.

How is normal rainfall measured?

What is a prolonged period of heavy rainfall?

Clearly identify the rehabilitation plan timeframe.

This also applies to the private turf banks where Bord na Mona acknowledge *that the private turf bank properties are' ecologically and hydrologically linked to the area owned by Bord na Mona. However, it is beyond the scope of the rehabilitation plan to address turf cutting issue on Umeras bog that are outside of the control of Bord na Mona'*.

Again, Bord na Mona acknowledge there will be damage to private property but appear to refuse to take responsibility for damage done.

In the Zoom consultation with Conor Feighery , community liaison officer, Alex Copeland, Bord na Mona Ecologist and Doreen King, project planner, 28th January 2021, Bord na Mona also acknowledged that when the drains are slowed down and /or blocked , turf production could stop within the year.

Will these property owners be compensated for the loss of their property?

Can they simply step in and destroy property without even advising them of the risks?

It is important to note from the outset, that **we are not seeking compensation after the damage is done.** We want to ensure that Bord na Mona will ensure to put all flooding prevention measures in place. We do not want our property wet over any time of the year. Any flooding of our property would result in unworkable land and decreased income. This would significantly reduce the value of our farm.

The effects of rewetting last forever.

We have carried out extensive drainage over the years and want to keep our land as it is today. Hydrological and Hydrogeological assessments must be carried out on the Bord na Mona property, our private property and that of the private turf bank holdings parallel to our property. We want the results of all assessments carried out to be made public knowledge before rewetting commences.

In a Zoom consultation as mentioned above, Alex Copeland stated that the boundary drains would be slowed down as opposed to blocked.

Before any rewetting commences, Bord na Mona must **clarify the difference** between slowing down and blocking a bog drain.

We have acquiree the right for water to pass freely through Bord na Mona property and if there is a backlog of water on our property after rewetting, we will seek damages against Bord na Mona regardless of flooding prevention measures and assessment results.

Could Bord na Mona, clearly identify the perceived environmental benefits and benefits for bio-diversity specific to Umeras bog if rewetting is carried out.

In the Bord na Mona plans, bog is **75% bare peat and of 'low ecological value'** . Nothing will grow here. This is a commonly known fact.

The **remaining 25% refers to the high bog and is described** as 'moderate value' because of the habitats that are present. Where Bord na Mona expected to find sphagnum moss, none was found. There are no environmental or bio-diversity benefits to rewetting Umeras bog. I understand that Bord na Mona state that sphagnum moss 'could' appear in 30 - 50 years, but significant damage to properties now, must be weighed against a small possibility that a small amount of sphagnum moss could grow.

There is a strong belief in the community that Bord na Mona intend on rewetting Umeras bog and walking away.

This is showing both Bord na Mona and the EPA in an unfavorable light.

There have been no independent sightings of rare or wetland birds in Umeras bog.

Countless independent surveys have been carried out over the years.

However, there are protected, and endangered animals found on Umeras bog to include the badger, red squirrel, and hare.

These animals have lived on and around Umeras bog undisturbed. Human interference and the fact that these are dry land animals will drive them out onto surrounding properties. Badgers and fallow deer are noted in the Bord na Mona plans as being plentiful in Umeras bog. There is a massive concern among the farming community that this will increase the risk of TB in the area.

On the other hand, shortly following the announcement of Bord na Mona plans, the Government announced a TB eradication program.

This is a major concern to Environmentalist groups.

Bord na Mona plan on rewetting 80,000 acres across the midlands. This is a significant project with far reaching consequences and should not be carried out under the cover of Covid.

We join with other farmers and the IFA in requesting the rewetting of bogs to be postponed until such time open and transparent communication can be had.

Could Bord na Mona or the EPA answer the following questions:

1. Confirm Bord na Mona's plans if Bord na Mona property is sold in the future
2. Could Bord na Mona also outline their plans in relation to the prevention of livestock entering the site when rewet. Any loss of livestock will be sought against you
3. When the bog is rewet, the site 'will not be fit for man nor beast' as described by one farmer who attended the IFA virtual meeting.
Could the IFA detail their proposed health and safety measures in relation to this bog and how they plan on fencing off the site from public access and livestock
4. Could you provide the names of the persons who drafted the plans for Umeras bog
5. Confirm that Umeras bog will not become a designated area in the future

This project can only succeed if there is trust and transparent, ongoing communication.

I would hope that Bord na Mona will recognise that the rewetting of this site will hold no value to them, the environment or bio-diversity going forward and revise their plans to a less destructive rehabilitation plan.

We do not trust that Bord na Mona will pass on our concerns to the EPA as they are required to do and that is why I am forwarding mine directly to you.

Have Bord na Mona made you aware of concerns to date, outside of the uproar in the media??

Ummeras bog is not a suitable bog for rewetting. The results for our property, would be catastrophic on the advice of a Hydrogeologist.

Other less destructive, environmentally friendly alternatives must be considered.

The EPA need to step in and take some control of the situation here. There are more ways to rehabilitate than rewetting