

Brennan, PaulM

From: Bucke, Ken
Sent: Tuesday 6 April 2021 10:59
To: Mahoney, Brian; Coggins, Karl; Sheridan, Alan
Cc: Hona, Seppi; Nugent, Ciaran; Collins, Kevin; Dunne, Seamus
Subject: RE: Harvesting pollution incident - Knockacummer Wind Farm Ltd.
Attachments: TFL00376919 Map Notes.pdf

All,

I inspected this site on Thursday in line with Brian's request and I understand that IFI were there subsequently on Friday, as a result of receiving a report.

Following inspection of the site, I walked the EPA stream and took a number of samples which I'll send for analysis later today or as soon as the lab can accept them.

Brian, do you know who the Fisheries Officers might have been so I can make contact with them?

I will write a report, to follow as soon as I get some time, but for the moment the operators have agreed to put in some mitigation at a couple of critical source areas, which should prevent further loss of silt. I would not recommend remediation works or anything that might bring a machine into the area again as this will create further disturbance, particularly as machine operations have ceased in this area. It would be much better at this point, to establish simple mitigation at the stream, the upslope bank of the drain that was crossed and at stages upslope of this crossing point.

As I say, I'll put together a note on it but I'd like to discuss it with IFI to ensure we're on the same page, which I'd imagine we are but as they were there on Friday, I want to ensure we're not giving the operators conflicting messages.

I told the forester that replanting requires a significant setback from the stream in the corner with broadleaves pit planted. There is to be no ground preparation for the rest of the site save for some inverted mounds if necessary in the drier area in the centre of the site.

The issue arose as the site is on peat, with the topography concentrating all the water to one stream in a corner. Drains and relevant watercourses would have become more active as the trees were removed and there was clearly not enough brash available on the site. The difficulty was further compounded by the extensive windblow, making the site difficult to get through and impossible to see what was underneath.

There is an EPA mapped watercourse just outside of the boundary of the site, however there is a smaller stream mapped as rising on the 6" maps, on the western boundary. There are some drains from the site connecting into this mapped rising which were the pathway but they would have been impossible to see walking through the site beforehand would have been impossible. They would not have been picked up on either by a desk assessment of the licence. What should have happened is that prior to commencement, a foreman should have walked the stream on the boundary and identified any areas where the site could connect to the stream, then followed this back to the operational area and installed mitigation. This should be a fairly standard practice and is the first thing I did when I left the site. More often than not, mitigation is not necessarily required throughout a site as long as the receptor is protected in the first instance; it can be bolstered then as required internally as operations progress, particularly on a site that is difficult to get through like this one.

I've attached rough map but I'll include the sample locations in the report.

When I was there, as operations had ceased in this area, the stream was running free of sediment, as was the EPA stream. The substrate in the EPA stream didn't show any signs of sedimentation either, however I do expect to see

an increase in ortho-phosphate downstream of a site like this, which will be short lived as operations continue. There isn't much brash material on the site and there will be no windrowing or concentration of the deadwood material that *is* there, so I wouldn't expect this site to be an ongoing source of phosphorous.

More detailed report to follow.

Best regards
Ken

From: Mahoney, Brian
Sent: Thursday 1 April 2021 14:52
To: Coggins, Karl ; Sheridan, Alan ; Bucke, Ken
Cc: Hona, Seppi ; Nugent, Ciaran ; Collins, Kevin ; Dunne, Seamus
Subject: Harvesting pollution incident - Knockacummer Wind Farm Ltd.

Colleagues,

FYI. Report on a harvesting pollution incident in the Mullaghareirk mtns.

From,
Brian Mahoney