

BORD NA MÓNA - UMMERAS BOG

Drainage Management Plan



IBE1803
Rp07
February 2021

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
D01	Draft	Various	Brendan Quigley	Grace Glasgow	29/01/2021
D02	Draft	Various	Brendan Quigley	Grace Glasgow	08/02/2021
F01	Final	Various	Brendan Quigley	Grace Glasgow	10/03/2021

Approval for issue

Grace Glasgow



8 February 2021

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EXECUTIVE SUMMARY

Ummeras Bog is located approximately 2.5km south-west of Rathangan, 3km north of Mónasterevin and c.4.5km south-west of Rathangan. The Grand Canal is located to the east of the site. The Slate River flows to the north of the site and meets the Figile, where it then flows south to the west of Ummeras Bog to meet the Barrow.

The rehabilitation measures will generally result in reduced runoff and drainage from the existing peat fields through a mixture of techniques including drain blocking, cell bunding and re-profiling. It is assumed that these measures will not significantly alter the existing topographical catchments.

Three potential impacts were considered: the potential to reduce the drainage function to upstream lands, the potential for increased flows downstream and the potential for increased groundwater levels impacting adjacent lands. There is no potential for increased flows downstream and the rehabilitation of Ummeras Bog, based on evidence from other bogs, will reduce the runoff from the bog by returning the peatlands towards its natural water retention function. The avoidance of reduced drainage function to upstream lands depends on Bord na Móna actively retaining the drainage routes which traverse the bog boundary upon which drainage of adjacent and upstream lands is dependent.

The potential for increased groundwater levels and to a lesser extent marginal alteration of the topographical catchments has been assessed based on a precautionary approach. With gravity drainage routes retained it is assumed that groundwater levels will reach the surface of the re-profiled peat fields but no higher than this. In this scenario adjacent lands which are at a lower level than the bog could potentially be impacted and the vulnerable area has been defined through a zone of influence approach.

Each of the land parcels has been assessed based on its vulnerability to increased groundwater levels within the bog. In most cases there exists a boundary drain separating the rehabilitation area from the potentially vulnerable lands. Best evidence has shown that these drains provide a positive gravity drainage function and through retaining them they will prevent any groundwater impacts on adjacent lands due to the hydrogeological break / cut-off they provide.

There are some limitations with this approach namely the effect of backwater levels and the lack of detailed survey of the boundary drainage network. Given the low level of risk at Ummeras it is appropriate in most cases that the DMP measures involve survey, monitoring and continued retention of the boundary drainage network. A suite of measures is identified in order to mitigate any deterioration in the drainage to adjacent lands should monitoring of these lands indicate a groundwater or drainage impact on these lands. In one instance, namely the reach along the south boundary of the bog it is recommended that new boundary drain is created to ensure a hydraulic break is created between the bog and adjacent lands. Together with the retention of the boundary drainage network these measures will ensure the rehabilitation measures do not negatively impact the adjacent lands.

1 INTRODUCTION

Ummeras Bog is part of the Kilberry Bog Group. Bord na Móna operated peat extraction within the Kilberry Bog Group under IPC Licence (Ref. P0506-01) issued and administered by the EPA. Condition 10.2 of this licence requires the preparation of a Rehabilitation Plan for permanent rehabilitation of the boglands within the licensed area.

It is proposed by Government that Bord na Móna carry out enhanced decommissioning, rehabilitation and restoration under the Peatlands Climate Action Scheme on peatlands previously used for energy production. This proposed Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved and significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered.

A key issue for Bord na Móna is the potential hydrological impact rehabilitation of this bog may have on the bog, surrounding lands and lands downstream which may be hydrologically linked to the bog. Rehabilitation measures generally seek to increase groundwater levels and surface water retention such that they are closer to the surface to encourage peat formation, the associated ecological benefits and carbon sequestration capacity. While in general terms this will reduce the volume of water released from the bog following a rainfall event, the impact on flood run-off is not well understood. Furthermore the increase in the local water table could result in negative impacts to surrounding lands if mitigation measures are not applied (e.g. to agriculture).

This Drainage Management Plan (DMP) for Ummeras Bog seeks to establish the baseline hydrological performance of the bog and the surrounding drainage network. The plan sets out the characterisation of the bog and surrounding lands, the existing performance of the drainage network and the level of flood risk. The plan identifies the potential hydrological zone of influence of the bog and the objectives, risks and opportunities associated with the rehabilitation of the bog. The plan assesses the potential impact of the various rehabilitation measures which are proposed on the local drainage network and flood risk. It sets out, where necessary, mitigation measures required to reduce impacts to an acceptable level. The plan sets out the measures which are required to be delivered in advance or in parallel with the rehabilitation plan as well as the long term operation and retention of the drainage network and associated infrastructure. The plan assesses the level of residual risk, the potential impact due to climate change and the adaptability of measures in response to these climate change impacts.

1.1 Bog Details

Ummeras Bog is located approximately 2.5km south-west of Rathangan, 3km north of Mónasterevin and c.4.5km south-west of Rathangan. It straddles the border between Co. Offaly to the north and Co. Kildare to the south. The surrounding landscape is dominated by farmland, largely consisting of improved grassland. There is some conifer plantation on older cutover bog and other peatlands in the local area. The Grand Canal is located to the east of the site. The Slate River flows to the north of the site and meets the Figile, where it then flows south to the west of Ummeras Bog to meet the Barrow.

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Ummeras Bog is somewhat isolated from other Bord na Móna properties, although Derrylea Bog is located 2.5km to the west of it. There is a small isolated section to the north-east of the main bog. This area was never developed by Bord na Móna and contains old and active cutover bog. There are property constraints affecting this section.

Bord na Móna started to level and cut drains at Ummeras Bog in 1973. Sod peat moss was originally harvested in 1980 and then harvesting of milled moss peat began in 1989. A works area is located at the south-west corner of the main section. A permanent railway runs along the southern boundary of the site into the works area. Horticultural peat moss has been harvested from this site although in recent years there was a switch to harvesting of milled fuel peat.

Industrial peat production has now completely ceased at Ummeras Bog. The entire bog is not within the ownership of Bord na Móna and domestic turf cutting is having an impact on the bog, both within and outside the BnM boundary.

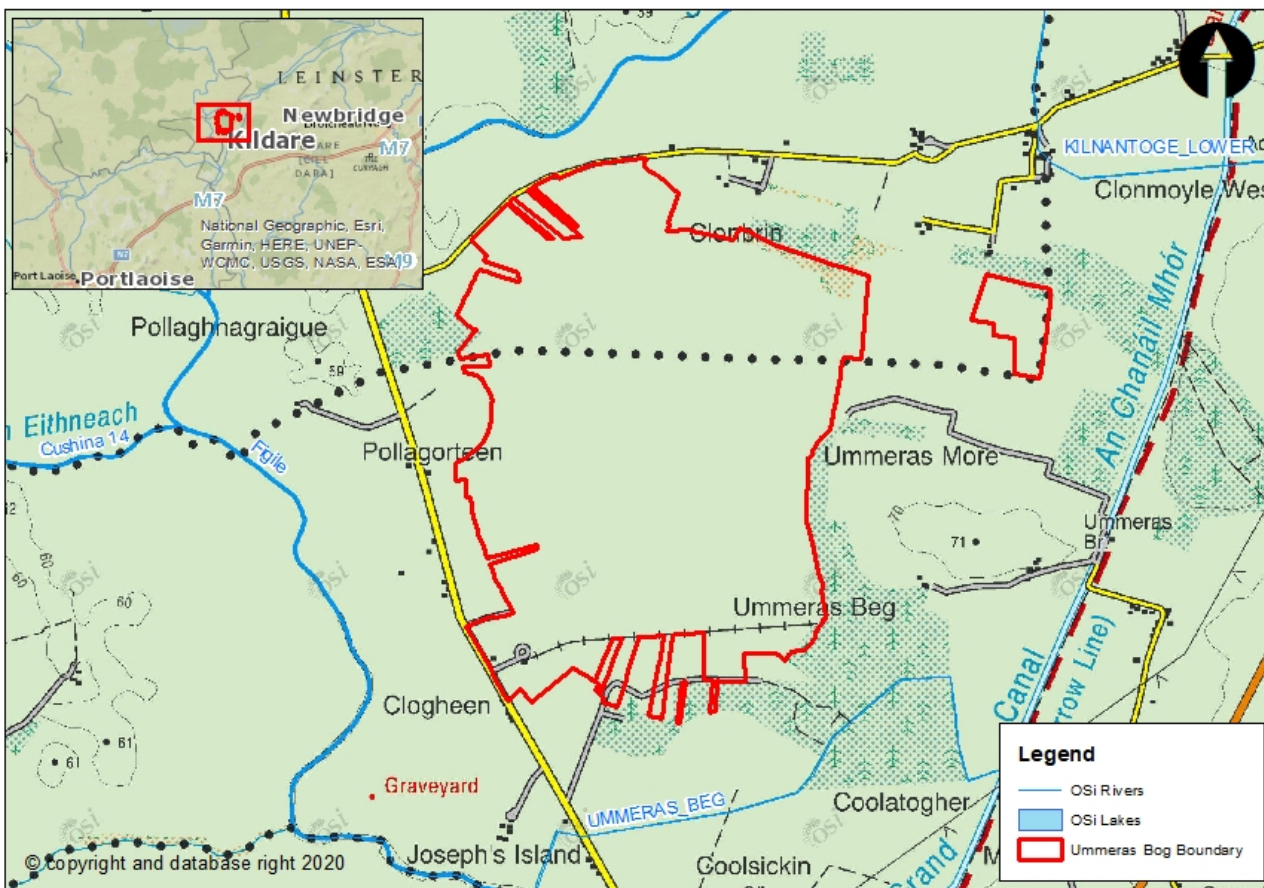


Figure 1.1 Location of Ummeras Bog

2 BASELINE ASSESSMENT

Through cessation of peat extraction and implementation of the Ummeras Bog rehabilitation plan there is the potential to impact the adjacent land. The extent of the impact will depend on the existing baseline characteristics of the catchments which drain the bog and the adjacent lands.

The purpose of characterising the catchment area is to develop an understanding of how the catchment currently operates and drains. The characterisation also investigates the risks, constraints and opportunities to the operation and drainage.

2.1 Study Area

To characterise the catchments a study area was determined encompassing the total catchment area draining the bog and adjacent lands through the bog. The drainage under the influence of Ummeras Bog discharges into external drains at various locations. In addition to these discharge points there is one inflow location where the adjacent agricultural land drains into the boundary drain of Ummeras Bog. A review was carried out to delineate the external drains around the bog as presented in Figure 2.1 along with their associated hydrological catchment area.

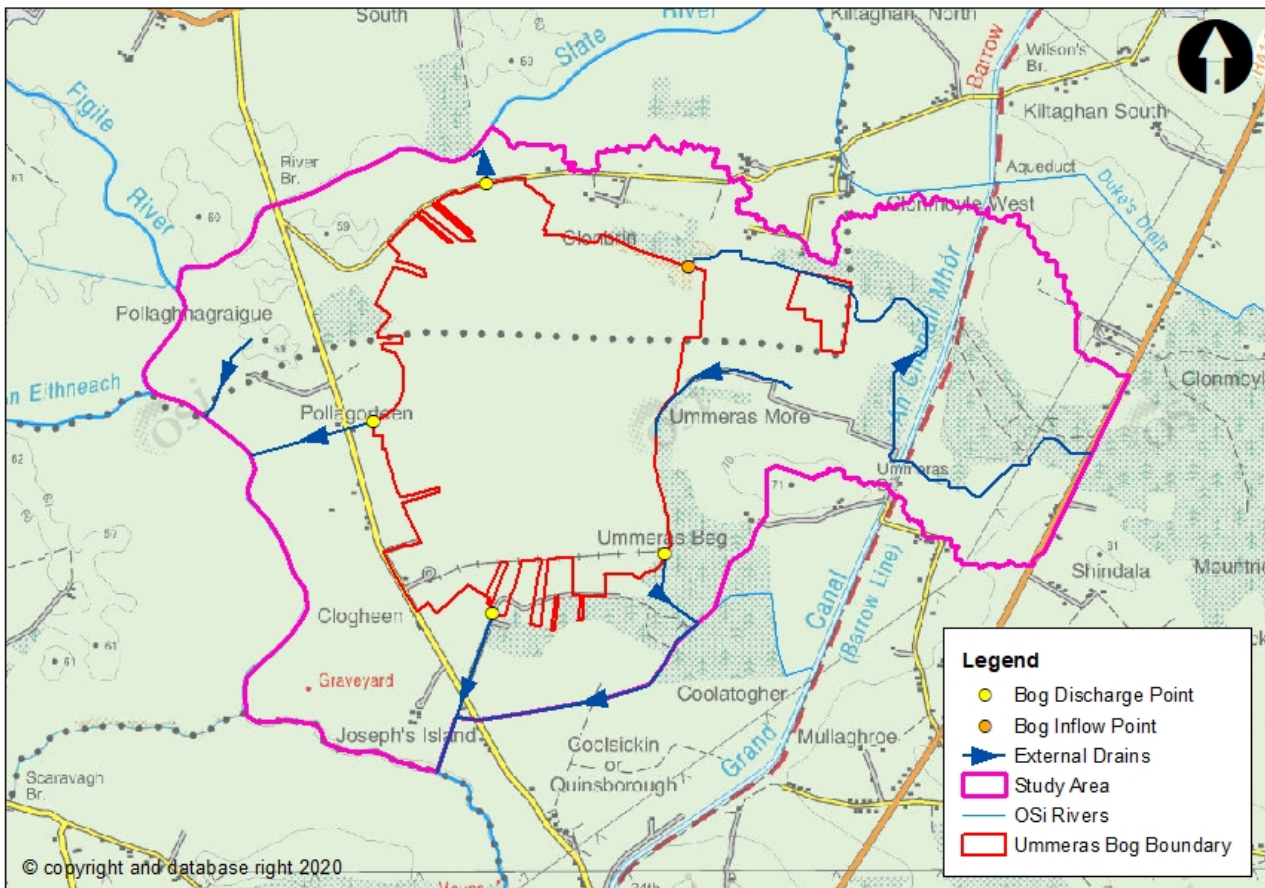


Figure 2.1 Study Area for Ummeras Bog

2.2 Catchment Runoff Characterisation

A hydrological analysis was carried out within the study area to delineate the sub catchments of the bog drains and the external drains. The recent Bord na Móna drainage survey was reviewed, and the bog sub-catchments confirmed. Sub-catchments of the external drains were identified using ARC GIS tools. The sub catchments are presented in Figure 2.2.

The FSU catchment characteristics provide an overview of how much rain a catchment receives, how impermeable the catchment is and how quickly the water will runoff the catchment due to topography and drainage. Table 2.1 summarises the FSU catchment descriptors for the sub-catchments identified in Figure 2.2.

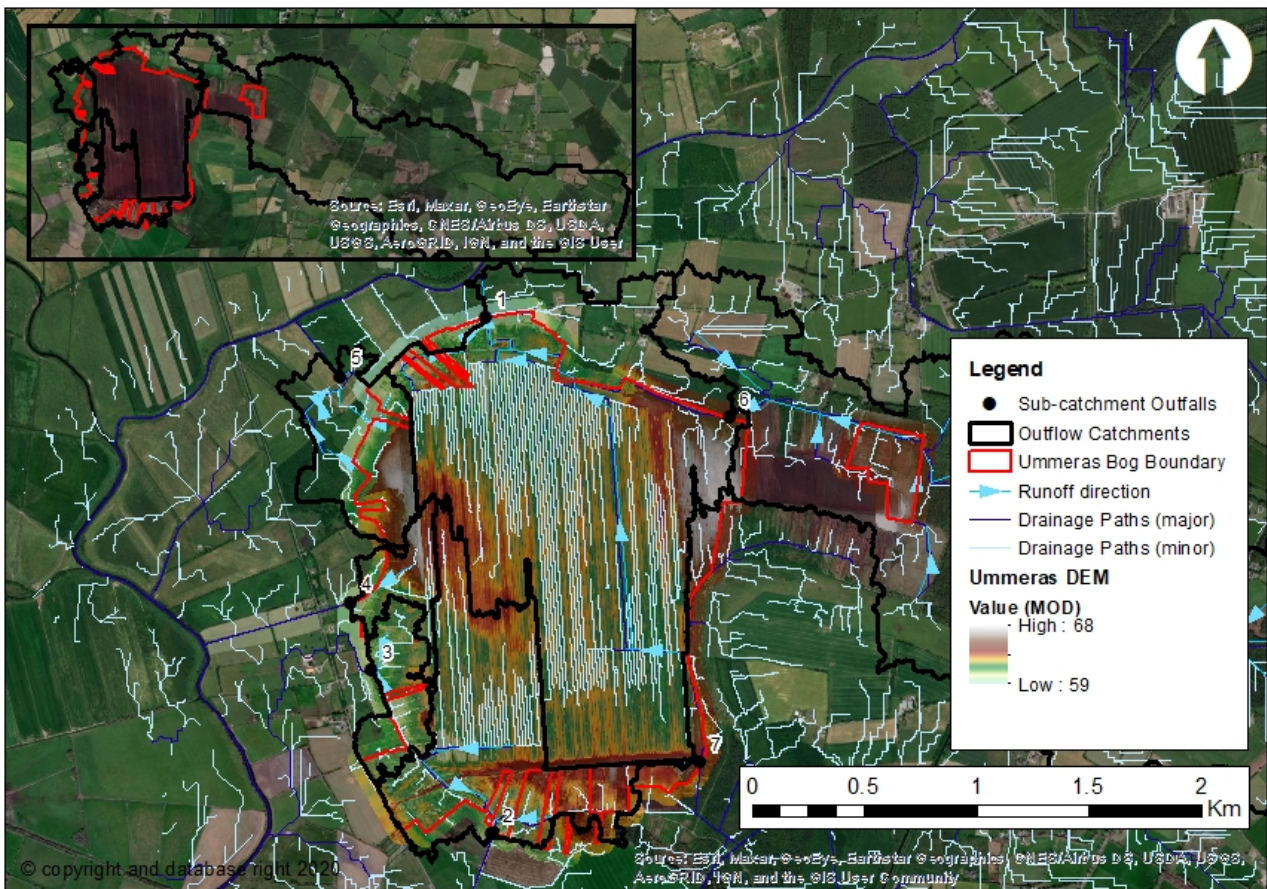


Figure 2.2 Drainage Networks and Sub-Catchments Draining Ummeras Bog

There are six sub-catchments draining Ummeras Bog and adjacent lands ranging in area from 0.18km² to 9.59km². The catchments are all subject to relatively low amounts of annual average rainfall. The Baseflow Index for all of the catchments ranges from 0.6 to 0.63 representing a fairly permeable catchment. The catchments range from flat to very flat.

The Index Flood Flow (Q_{med}) values, which represent the typical peak flood flow which might be anticipated (a 50% chance of being exceeded in any given year), for each of the sub-catchments have been calculated. This is based on two different methods, the Flood Studies Update (FSU) 5 variable equation designed for small and

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/ or urbanised catchments in Ireland, and the RPS derived Peat Q_{med} equation, derived in support of the Drainage Management Plan project for SAC sites on behalf of NPWS. Both methods result in very similar Q_{med} values where the proportion of arterial drainage (ARTDRAIN2) is assumed to match the proportion of the catchment managed by Bord na Móna (drained).

Table 2.1 Physical Catchment Descriptors of Sub-Catchments Draining the Bog

Sub-Catchment Number	Area (km ²)	SAAR (mm)	BFI	FARL	ARTDRAIN2	PEAT (%)	S1085 (m/km)	FSU5 Q _{MED} (m ³ /s)	Peat Q _{MED} (m ³ /s)	
1	9.59	815.32	0.623		1	0.545	54.5	2.156	1.563	1.254
2	0.75	832.01	0.618		1	1.000	100.0	2.437	0.158	0.167
3	0.18	828.98	0.598		1	1.000	100.0	2.631	0.044	0.049
4	0.13	828.98	0.599		1	1.000	100.0	0.522	0.022	0.037
5	0.34	815.55	0.625		1	0.928	92.8	2.688	0.076	0.078
6	7.45	815.32	0.623		1	0.438	43.8	2.398	1.271	0.961

2.3 Hydrogeological and Soil Characterisation

The majority of the underlying geology at Ummeras Bog is dark limestone and shale, with the southern and eastern tip of the bog underlain by limestone and calcareous shale. The underlying soils and sub-soils are classed as 'Raised Bog Cutover Peat'. A glacial gravel ridge has become exposed in the mid-eastern part of the site.

Lacustrine deposits (lake deposits) are also present under the peat (lacustrine shell marl) at the northern end of the site. The peat is underlain by glacial deposits interbedded with glacio-fluvial deposits over limestone bedrock in places. The glacial deposits generally consist of grey gravelly clay/silt.

The Study Area is generally overlain by peat soils with peaty gleys transitioning to surface water gleys on higher elevations. All of these soil types represent fairly impermeable soils however the areas to the western extent of the bog where marl is exposed represent strong potential for transfer of groundwater and surface water flows. The western and northern extents of the Study Area adjacent to the River's Figile and Slate are also covered by marl type alluvial soils which are considered highly permeable.

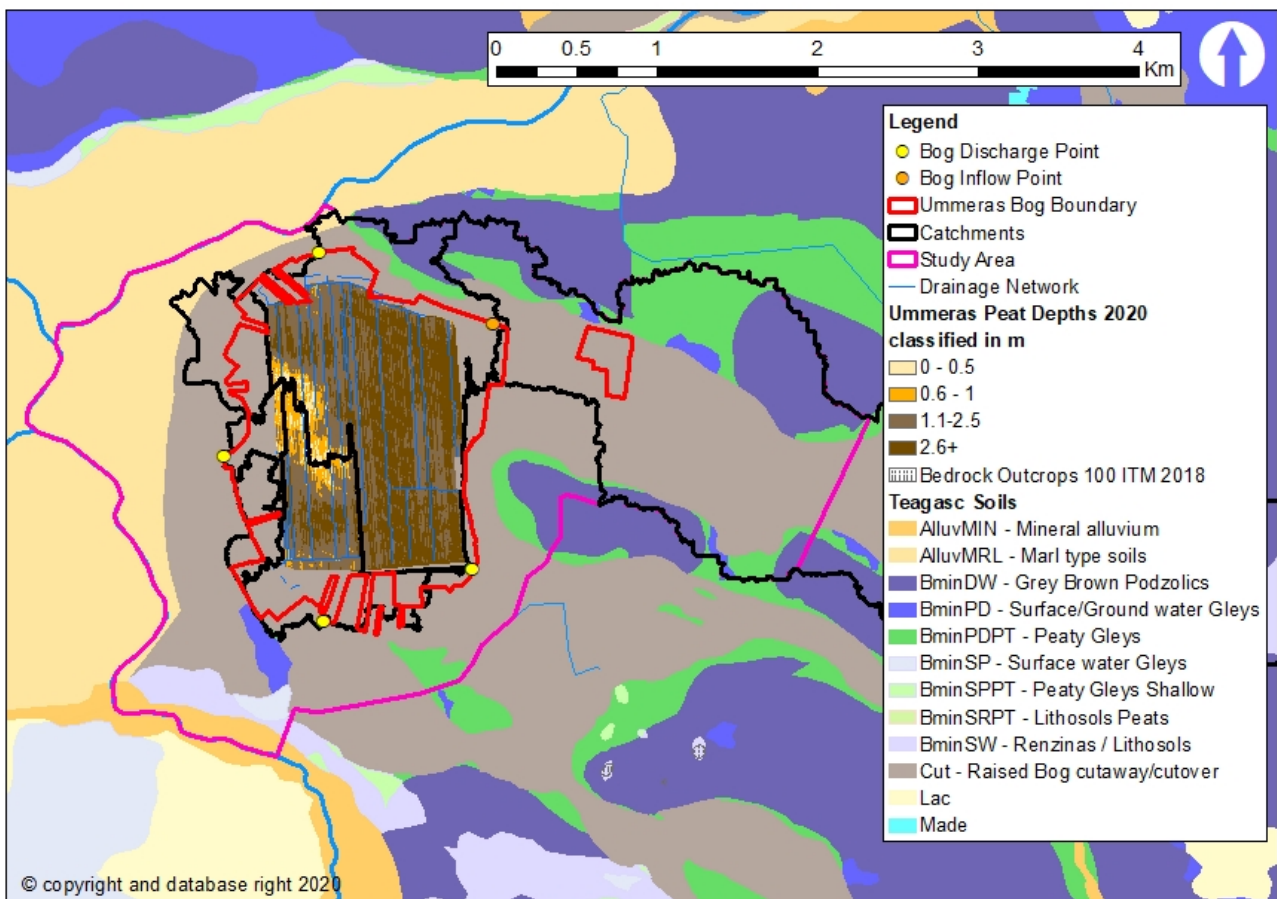


Figure 2.3 Hydrogeological and Soil Characteristics of Ummeras Bog

2.4 Morphological and Hydraulic Characterisation

A desk top review was carried out of bog drains and external drains. Morphological and hydraulic features were identified.

The external drains are generally small with gentle bed slopes. Aerial photography shows no signs of erosion or deposition however given that the drains are considered small with gentle bed slopes there would be a risk of deposition, and therefore reduced land drainage efficiency. Risk of deposition would occur where there is potential for an erosion or debris source from the surrounding land and where there is potential head loss in the channel due to instream features. Figure 2.4 details the reaches of the external drains where there are potential erosion or debris sources and where instream features may facilitate deposition. The figure shows that due to the location of commercial forests, woodlands and disturbed peat in the surrounding lands there are existing potential sediment sources that could enter the external drains. Given the presence of culverts, sharp bends and inflows along the external drains there would be a potential of sediment settling and deposition occurring. The potential for Ummeras Bog being a sediment source to the external drains is considered low due to the presence of silt ponds at all discharge points and that peat extraction activities have ceased.

A review of the bog drains was carried out. The Bord na Móna drainage survey details the open drains, pipes, silt ponds and discharge points. All discharge points have a silt pond located upstream which will reduce the amount of sediment leaving the bog as water is drained. The drains in the bog have very gentle bed slopes and pass through numerous pipes before discharging from the bog. It would be expected that the bog drainage network would be sensitive to drain and pipe alterations and the boundary drain which receives an inflow from the adjacent land, as shown in Figure 2.4, needs careful consideration. A reduction in this drain's capacity has the potential to impact on the agricultural land that drain into the bog.

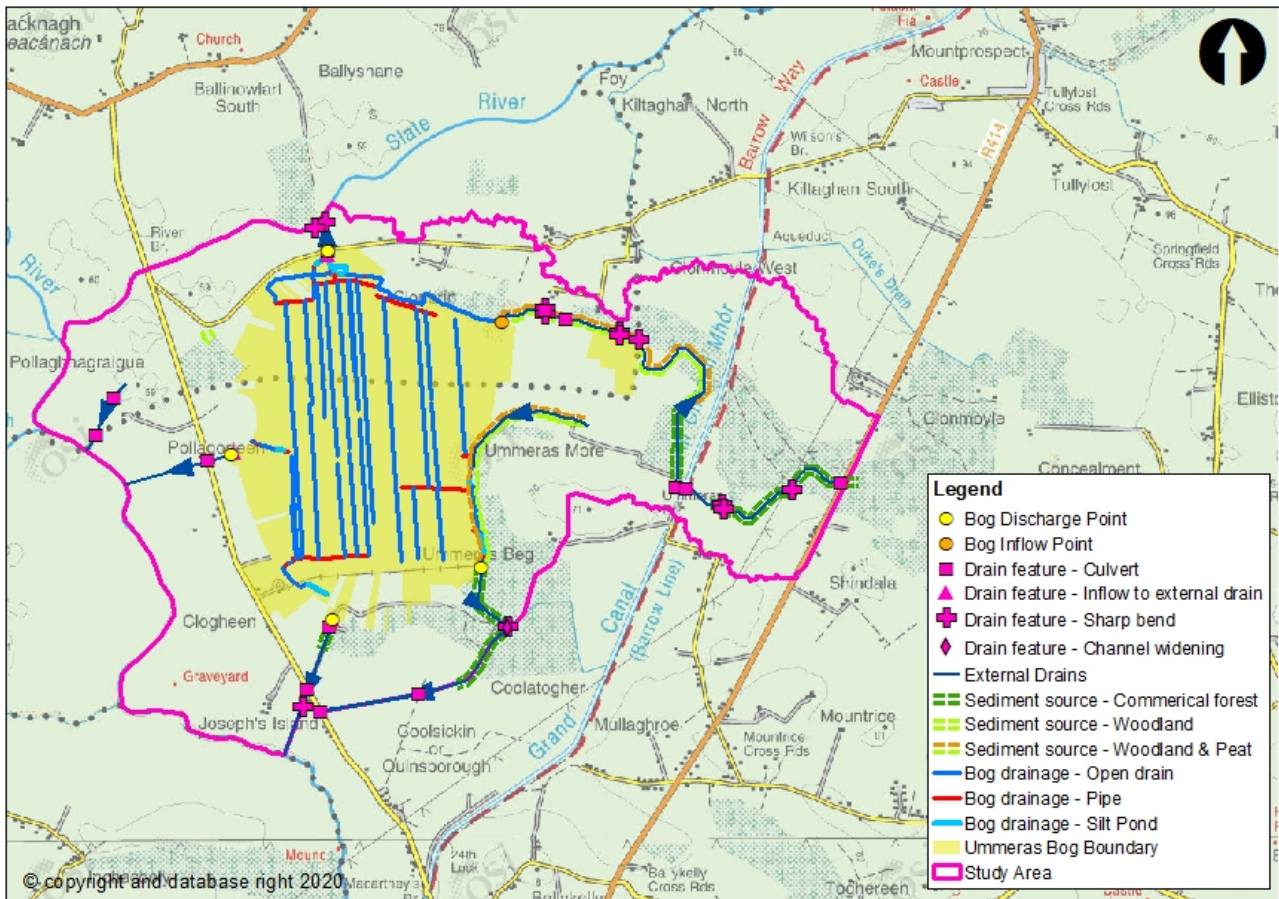


Figure 2.4 Morphological and Hydraulic Characteristics of Ummeras Bog and environs

2.5 Land Use Character

The majority of the land within the study area is peat bog and pasture. The remaining areas of the study area consist of coniferous forest, arable land and transitional woodland shrub. The CORINE land use dataset was used to identify landuse types. This dataset was then reviewed using aerial photography to establish landuse amendments or land use alterations. The review found that additional woodland areas are located in the study areas and some peat bog has been improved. There are some minor roads and properties located in the study area also.

The pasture land is mainly used for livestock which provides food production. The majority of the peat bog outside the Bord na Móna bog shows evidence of being harvested for domestic fuel production. Other areas of peat bog are undisturbed which contribute to carbon storage and biodiversity. The woodland areas are likewise providing carbon storage and biodiversity albeit as a different habitat to the peat bogs. The minor roads within the study areas service properties and provide access to the pastures, forests and peat bogs.

In addition to the land use the Figile River corridor runs adjacent to the Bog.

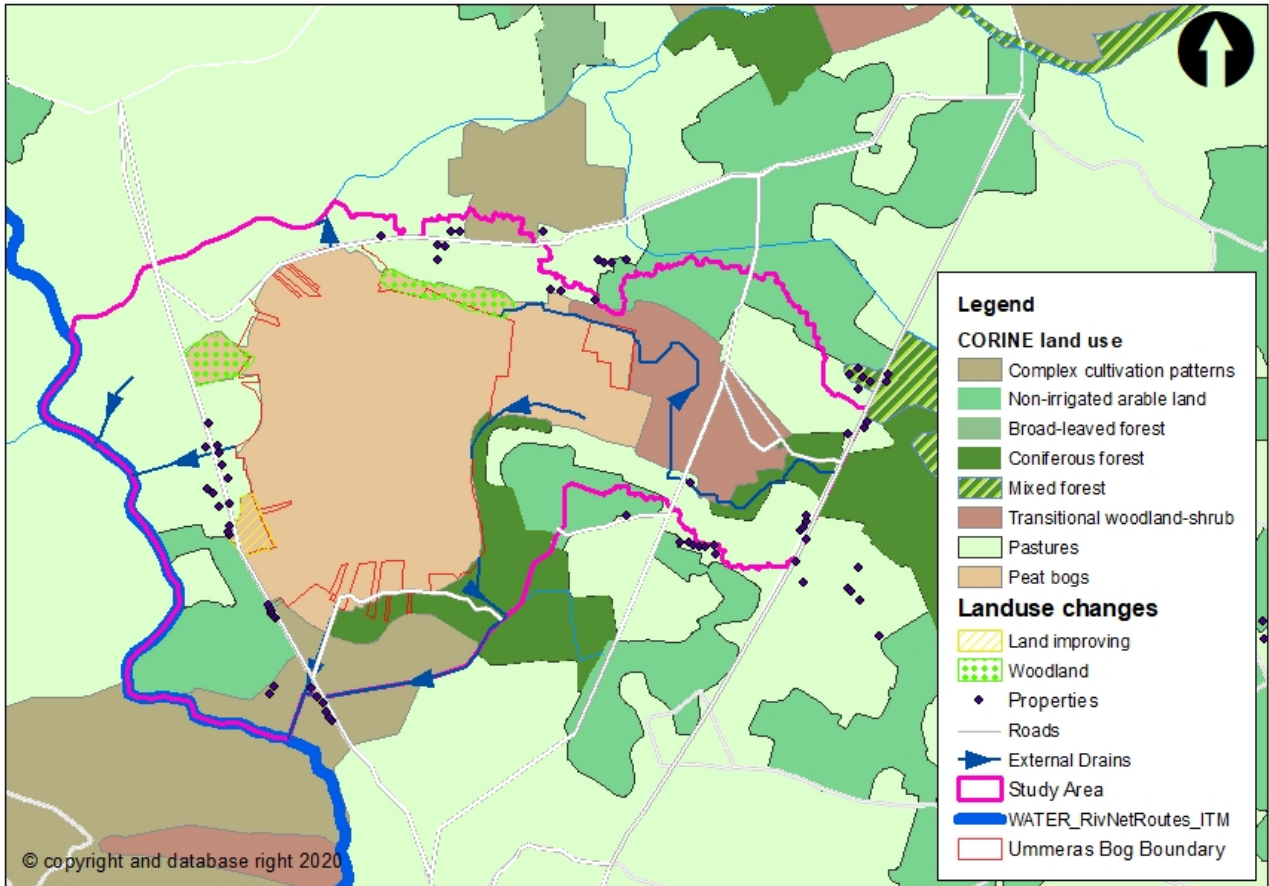


Figure 2.5 Land Use Characteristics of Ummeras Bog and environs

2.6 Flood Risk

A number of sources of flood risk information are available, both predicted and simulated, in proximity to Ummeras Bog. These include:

- CFRAM Study maps setting out the predicted fluvial 10%, 1% and 0.1% Annual Exceedence Probability (AEP) fluvial flood scenarios
- Evidence from the OPW website www.floodinfo.ie on historic flooding
- Anecdotal evidence from Bord na Móna

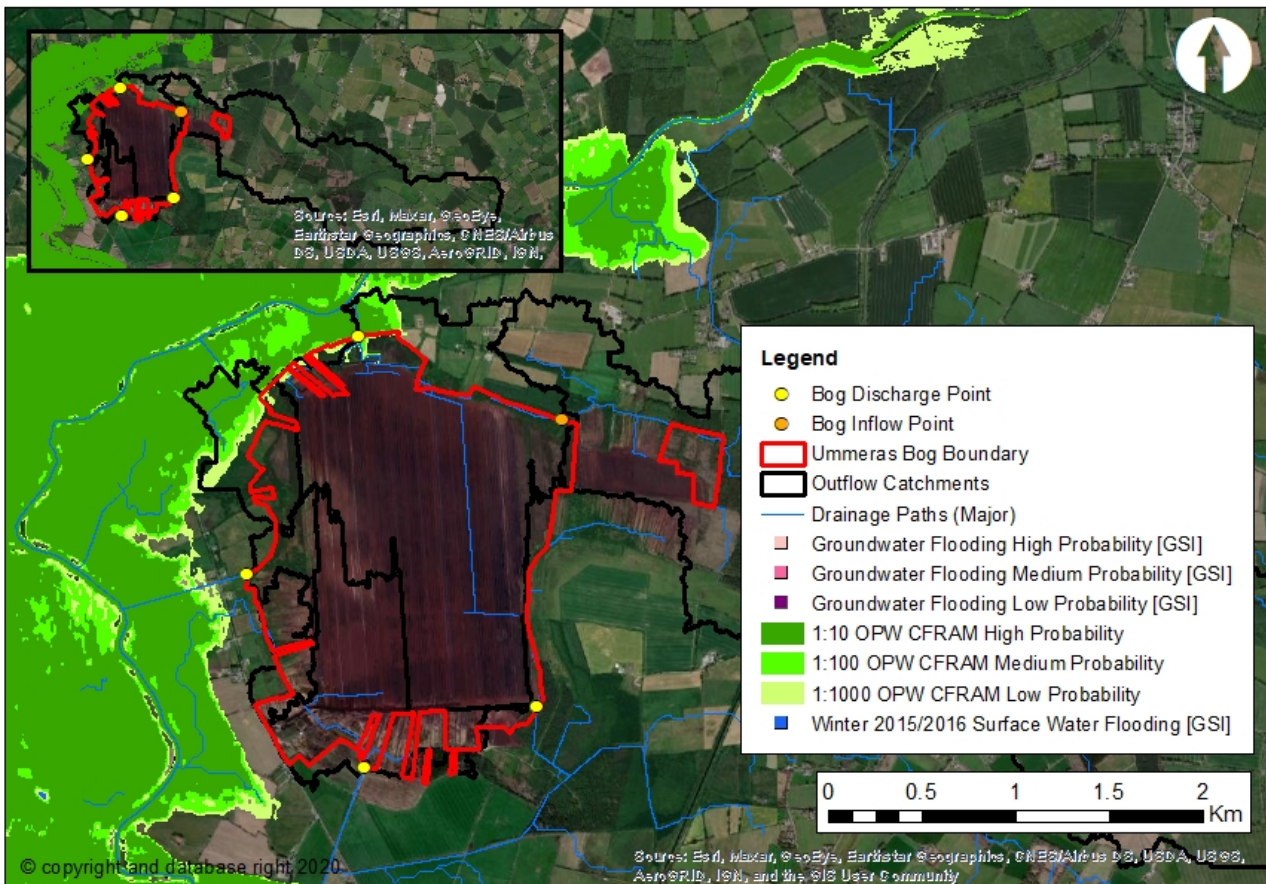


Figure 2.6 Flood Risk at Ummeras Bog

OPW CFRAM flood maps show flood risk from the Figile and Slate rivers extending to the bog boundary but does not encroach into the bog. No surface water or ground water flooding has been predicted or recorded. No observations from Bord na Móna have identified any areas of flooding.

Further information from the OPW www.floodinfo.ie website indicates records of historic flooding to the south and east of the bog as shown in Figure 2.7. No specific information is given on this flooding but rather it is labelled as recurring flooding. It is not reflected in the CFRAM extents however these do not capture hydraulic analysis of the flood risk from smaller tributary watercourses of the Slate / Figile rivers.

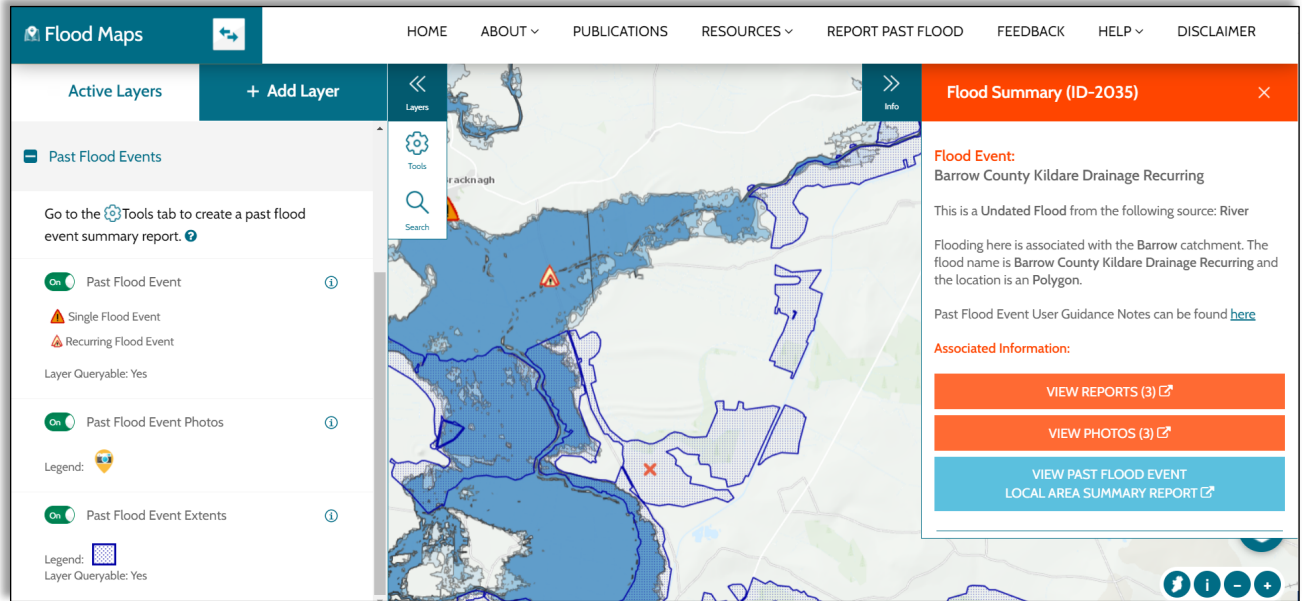


Figure 2.7 OPW Historic Flood Records on top of CFRAM Mapped

2.7 Summary

The drainage network sub-catchments within Ummeras Bog and its environs were used to delineate the study area for the Ummeras Drainage Management Plan. The overall catchment area was characterised within the context of hydrology, hydrogeology, morphology, landuse and flood risk.

A detailed drainage network delineation was carried out. Drains within the bog and external drains were identified. The assessment showed that the northern and eastern section of the bog discharge to the north to the Slate River a tributary of the Figile River. The South Western sections of the bog discharge directly to the Figile River.

The catchment area is considered to be relatively small, flat, fairly permeable with a low annual rainfall. Peak flood flows range from around 0.16 – 0.28 m³/s per square kilometre (1.6 – 2.8 l/s per hectare) for the Q_{med} event to 0.46 – 0.79 m³/s per square kilometre (5 – 8 l/s per hectare) for the Q₁₀₀ year plus climate change event.

The bedrock within the catchment is limestone, however no karst features were identified in GSI records which could influence groundwater movement and flooding. The soil on top of the bed rock is mainly peat with some other soils on the higher ground all of are typically impermeable. However the presence of highly permeable marl both within the bog and on the floodplains of the Figile and Slate River’s represent a potential route of transfer between surface water and groundwater.

The morphological and hydraulic characteristics of the external drains were assessed. No signs of erosion or deposition could be observed. Areas of deposition risk were identified along each drain. Culverts, bends, inflows and channel widening were identified as potential factors for sediment deposition. Woodlands,

commercial forest and bare peat adjacent to the drains were identified as potential sources of sediment. Given that the drains are relatively flat the risk of deposition in the external drains is considered high.

The land use was assessed within the study area. The majority of land is peat bog, some of which has been drained for agricultural purposes. Pasture land makes up a significant proportion of the study area also. The remaining land is made up of coniferous forest, arable land and transitional woodland shrub. The land provides important services such as food production, domestic turf cutting, carbon storage, biodiversity and habitat creation.

Table 2.2 summarises the constraints, risks and opportunities identified as part of the baseline assessment.

Table 2.2 Potential Opportunities / Constraints

Land Parcel / Feature	Risk or Opportunity?	Details
Agricultural land	Constraint	It is important to maintain the productivity of agricultural land surrounding the bog
Peat bog	Constraint	Where turf is still being extracted from other bogs adjacent to Ummeras Bog conditions should be not be made worse.
Roads	Constraint	Minor roads are located in the study area providing access to a properties, agricultural land and peat bogs. Access to these roads should be maintained.
River Figile and Slate	Constraint	Multiple bog discharge points connect Ummeras Bog to the Figile and Slate rivers. No activity should adversely impact this area.
External drains	Risk	Risk of deposition in the drains is considered high due to potential sediment sources in adjacent lands and features within the external drains. External drains may be sensitive to change.
Bog rehabilitation plan	Opportunity	To improve water quality discharging from the bog; stabilisation or improvement in water quality parameters (e.g. suspended solids)
Bog rehabilitation plan	Opportunity	To reduce carbon emissions from the bog and to set bog on a trajectory towards naturally functioning peatlands habitats. Ummeras has potential to develop embryonic Sphagnum-rich vegetation that has potential to be a carbon sink.
Bog rehabilitation plan	Opportunity	To improve biodiversity by vegetating bare peat and creating more habitat for flora and fauna.
Bog rehabilitation plan	Opportunity	To reduce runoff and restore a more natural runoff regime, thus contributing to flood risk management.

3 BOG REHABILITATION PLAN

The Ummeras Bog rehabilitation plan¹ consists of the following measures as summarised in Table 3.1 and presented in Figure 3.1.

Table 3.1 Ummeras Bog rehabilitation measures

Restoration	Description of measures
Deep peat restoration	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes
	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows
	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows
	Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows + drainage channels for excess water + Sphagnum inoculation
Dry cutaway restoration	Blocking outfalls and managing water levels with overflow pipes
	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment
Wetland creation	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes
	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes
Other	Maintain silt ponds

¹ For further details see Ummeras Bog Cutaway Bog Decommissioning and Rehabilitation Plan 2020 report

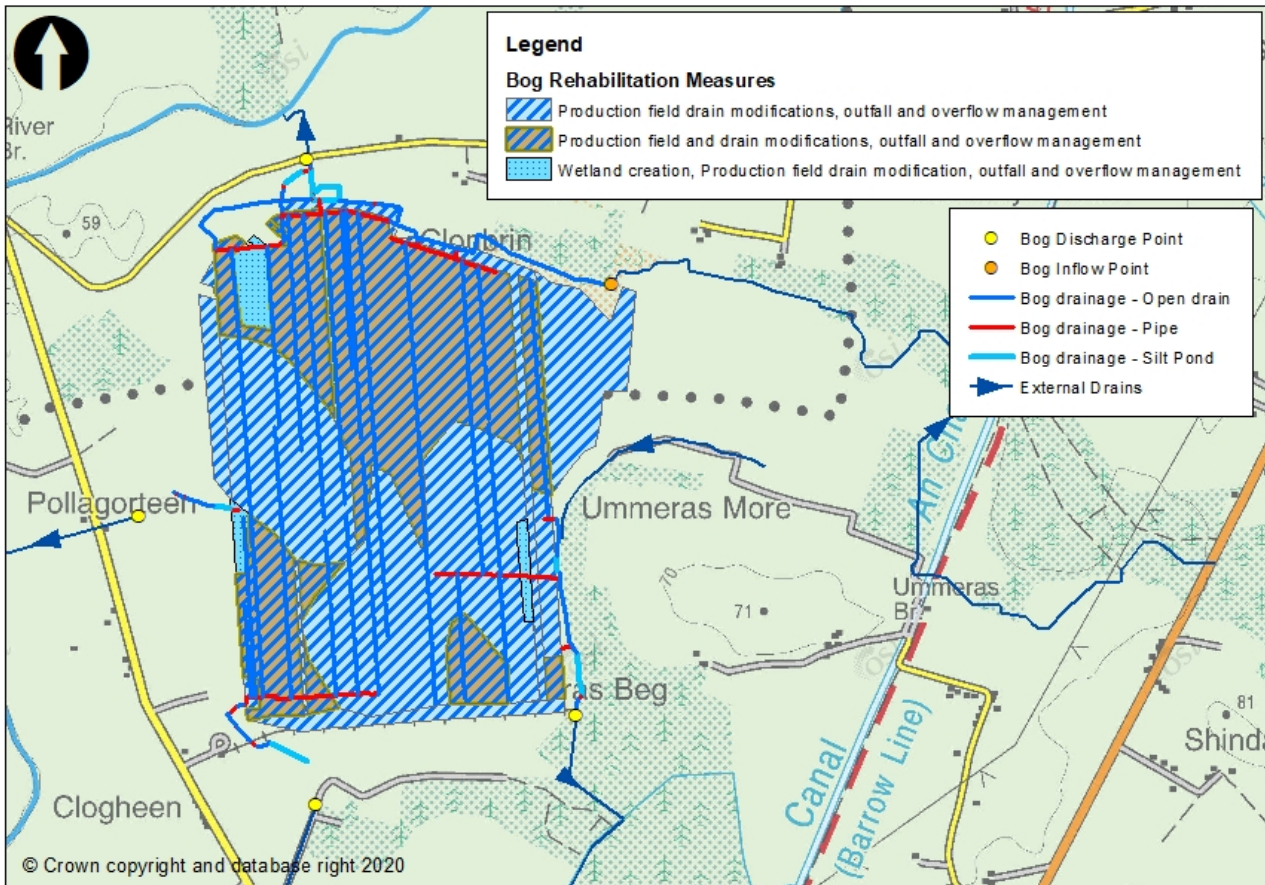


Figure 3.1 Ummeras Bog Rehabilitation Plan

Each measure while designed to promote the rehabilitation and re-wetting of the bog will have a potentially positive and/or negative impact on the adjacent land. This section identifies and assesses these potential impacts.

3.1 Impact Screening

Table 3.2 summarises the rehabilitation measures proposed for the Ummeras Bog and their potential impact to adjacent land.

Table 3.2 BRP measures proposed at Ummeras Bog

BnM rehabilitation measure	Description	Potential Impact	Potential Impact Description
Berm Construction	low level berm is proposed across the bog in order to retain water within the bog to help raise ground water	Positive & Negative	<p>Reduced runoff from the bog discharge points resulting in less flow in the external drains located downstream.</p> <p>Raised groundwater levels to the bog surface will create a hydraulic gradient across the bog into the adjacent land. Ground water levels</p>

within this hydraulic gradient will potentially rise. The effect will be greatest immediately beside the bog.

<p>Drain blocking, cell blocking, berm and field re-profiling</p>	<p>Existing production field drains within the bog areas that convey surface water away from the former peat production fields towards the bog discharge points will be modified to reduce conveyance or removed altogether by infilling.</p>	<p>Positive and negative</p>	<p>Reduced runoff from the bog discharge points resulting in less flow in the external drains located downstream.</p>
	<p>Surface water runoff through the bog will be slowed allowing the bog to store more water</p>		<p>Reduced conveyance at bog inflow point resulting in increased water volume in external drain located upstream if conveyance channels through the bog are blocked.</p>
<p>Blocking outfalls</p>	<p>Most production field drain systems drain into a headland pipe running perpendicular to the peat field. This intersection is known as an outfall.</p>	<p>Positive and negative</p>	<p>Reduced runoff from the bog discharge points resulting in less flow in the external drains located downstream.</p>
	<p>By blocking the outfalls each production field drain will be prevented from operating resulting in the ditch storing water and raising the groundwater level in the bog. This will allow the bog to store more water and bring the groundwater level to the surface.</p>		<p>Raised groundwater levels to the bog surface will create a hydraulic gradient across the bog into the adjacent land. Ground water levels in lands within this hydraulic gradient will potentially rise. The effect will be greatest immediately beside bog.</p>
<p>Managing overflows with overflow pipes</p>	<p>This measure is usually combined with blocking outfalls which cause groundwater levels to rise. As the bog fills up it will want to overtop at the lowest part of the bog boundary. Overflow pipes control the location this occurs and where the overtopping water is discharged to.</p>	<p>Neutral</p>	<p>The control features will determine the location of the discharge from the bog. However the flow leaving the bog once it is full will be the same as prior to remedial works.</p>
			<p>Overall the volume of water discharging from the bog will be reduced but will contribute to raised groundwater levels within the bog and potentially within the zone of influence (subject to mitigation).</p>
<p>Drainage channel for excess water</p>	<p>This measure will work in conjunction with the overflow faetures. Where suitable drainage channels do not exist or are of insufficient capacity along the bog boundary, a new or upgraded drainage channel will be provided.</p>	<p>Positive</p>	<p>Drainage channels of sufficient capacity will ensure any overtopping water from the bog does not enter adjacent land. Drainage channels will also act as a hydraulic break in groundwater limiting the impact of bog measures to the groundwater in adjacent lands.</p>
	<p>These drainage channels will convey all flows from the bog to suitable watercourses.</p>		

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Sphagnum moss inoculation	This measure will propagate sphagnum moss within the bog. Sphagnum moss will cause bog regeneration as it grows and layers.	Positive	<p>Sphagnum moss can hold up to 10 times its weight in water. As such this measure will store water reducing the runoff from the bog into the exterior drains. This will help retain the external drainage efficiency which adjacent land relies on.</p> <p>This measure may also contribute to runoff reduction and wider catchment FRM goals but in a piecemeal way.</p>
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Silt ponds	Existing silt ponds will be maintained to store runoff water from the bog and allow any suspended peat to settle out of the water before it is discharge to the external drains.	Neutral	<p>Maintained capacity from the bog discharge points to the external drains and river located downstream.</p> <p>Maintained quality of water being discharged from the bogs into the external drains or river.</p>
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Wetland creation	Areas prone to flooding are designated for wetland creation. Standing water will be allowed to occur resulting in increased water storage. Establishment of reeds and other rhizomes will form part of the wetland creation.	Positive and Negative	<p>Reduced runoff from the bog discharge points resulting in less flow in the external drains and river located downstream.</p> <p>Raised groundwater levels to the bog surface will create a hydraulic gradient across the bog into the adjacent land. Ground water levels within this hydraulic gradient will potentially rise. The effect will be greatest immediately beside the area where the wetland is created.</p>
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3.2 Impact Assessment

Three potential impact sources were identified; groundwater rise, increased runoff from the bog and reduced drainage capacity into the bog. These impact sources have the potential to make the adjacent land wetter and drain less efficiently. An assessment was carried out to delineate the zone of influence resulting from these potential impact sources. Figure 3.2 presents the areas which are at potential risk.

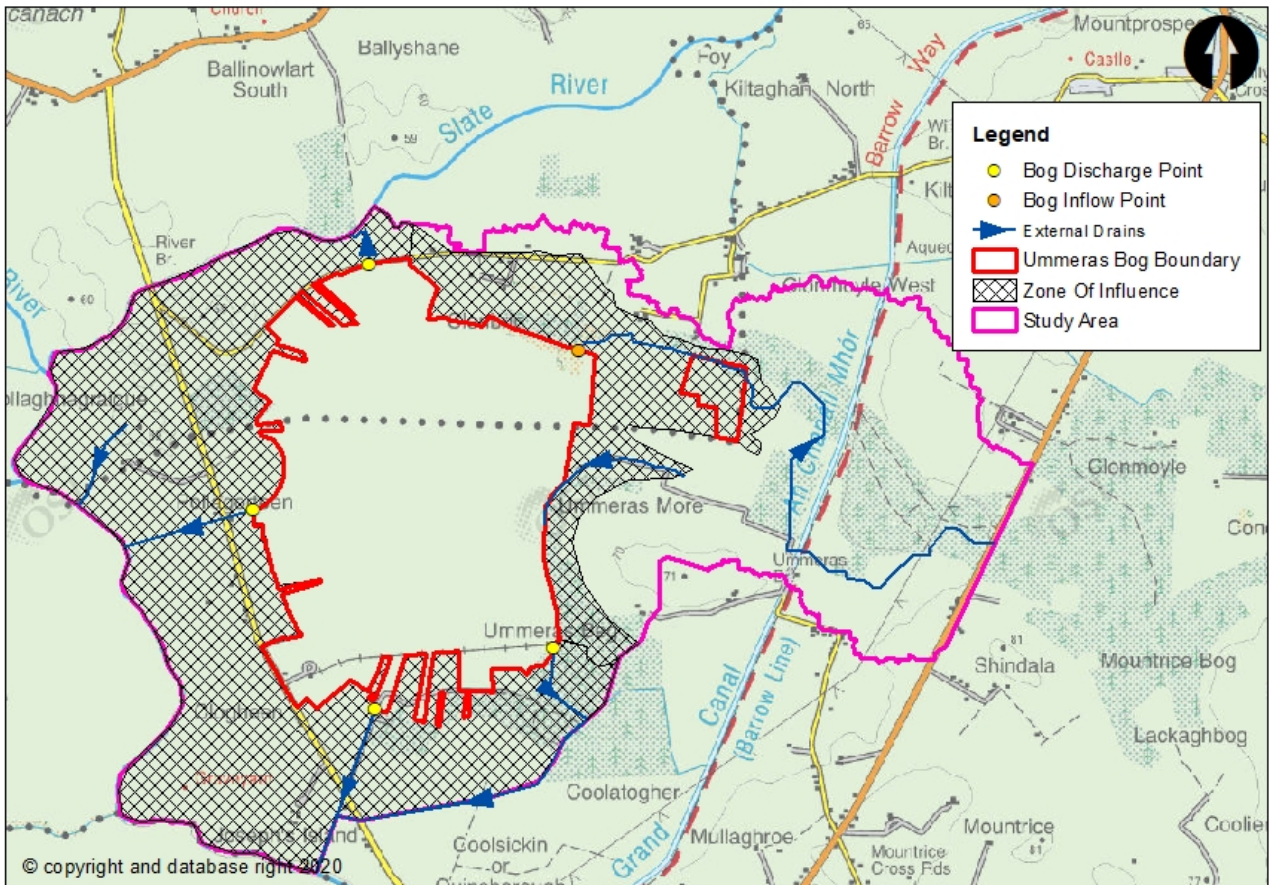


Figure 3.2 Ummeras Bog Rehabilitation Plan – Zone of influence

3.2.1 Groundwater Impact

The impact of rehabilitation measures on groundwater levels within and adjacent to the bog is difficult to assess quantitatively in the absence of long term monitoring data and hydro-geological models of the bog. Nevertheless it can be assumed that groundwater levels will rise within the bog itself given that this is an objective of the rehabilitation measures – to restore the hydrological conditions for peat formation. It can also be assumed that the maximum level which groundwater will reach outside areas zoned as wetland is the surface of the peat fields post-rehabilitation. This is because topographical flow paths for surface water out of the bog (by gravity) will be retained and the bog is not dependent on a pumping regime to ensure ponding does not occur. For areas zoned as wetland the maximum water level will be above surface level as water ponding is promoted through rehabilitation measures.

Groundwater rise in lands adjacent to the Ummeras Bog was assessed firstly by estimating the potential rise in groundwater within the bog. The drainage system in the bog is, on average, 1.5m deep. It can be expected that groundwater would rise by 1.5m to bring it to the surface in non-wetland areas. Water level rise in wetland areas is expected to be greater and will be determined by the higher surrounding bog fields or the construction of a berm and by the outlet control to the wetland area. As the groundwater rises in the bog a head water difference will be created between the bog and adjacent land forming a hydraulic gradient (see Figure 3.3a and 3.3b). Groundwater will flow across the hydraulic gradient. This flow will be dependent on the porosity of the ground it flows through and the head difference. This will determine the extent of the zone of influence and the area of potentially wetter ground. Where external drains are located in the zone of influence they will act as a hydraulic break or groundwater cut-off and reduce the zone of influence (see Figure 3.3c). This however is dependent on the drain's ability to convey water away. Drains that are inefficient with high water levels (independent from the bog rehabilitation measures) will also raise the groundwater and the adjacent lands to the bog would be wet (see Figure 3.3d). The avoidance of the drain full condition is dependent on maintenance of a positive gravity drainage function of the boundary drains through monitoring and maintenance.

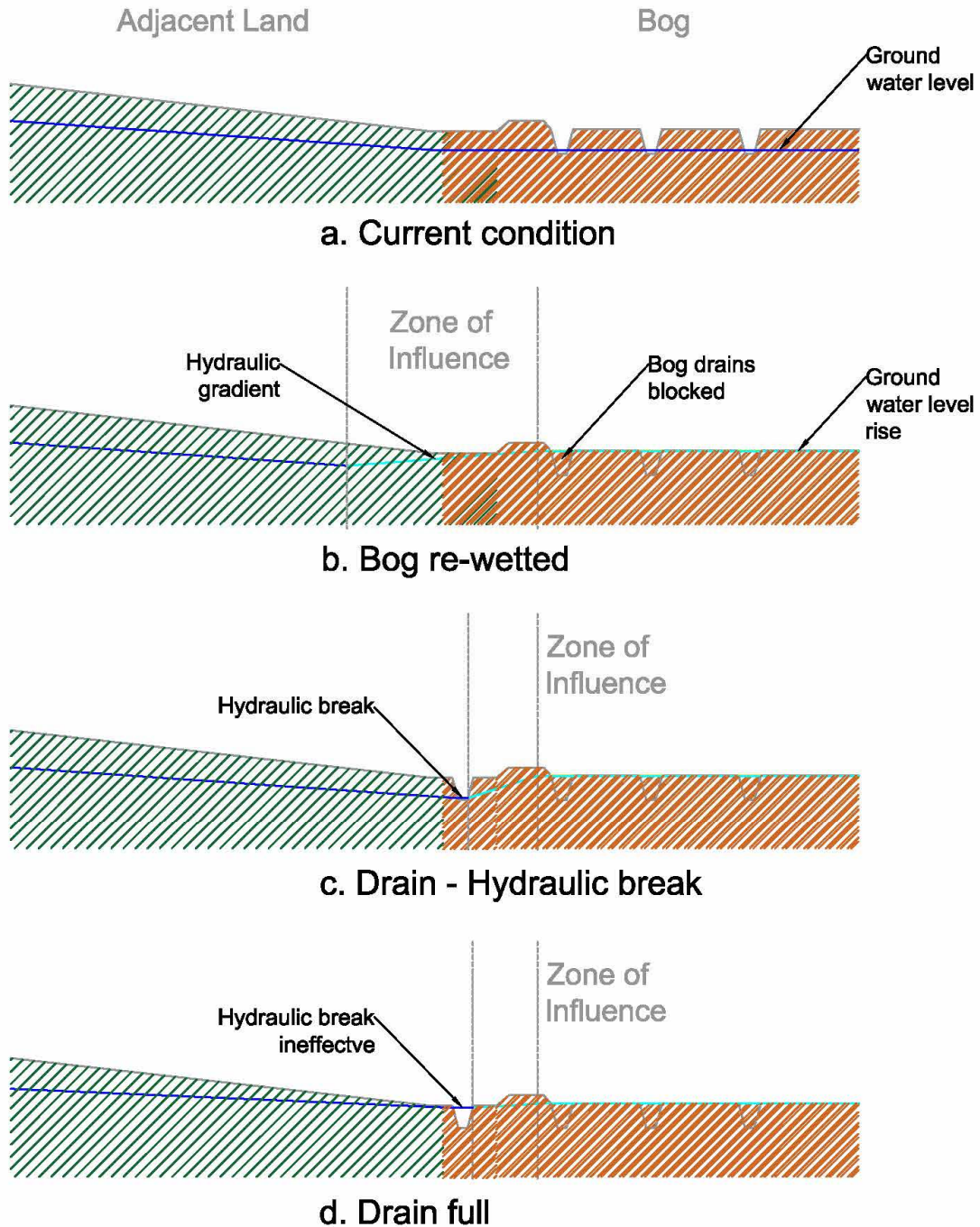


Figure 3.3 Conditions affecting groundwater

A complete survey of the boundary and external drains which provide the groundwater cut-off function to agricultural lands was not available for Ummeras Bog. It is assumed that these drains would be able to convey Q_{med} (2 year return period) flows under non-backwater conditions which would be typical of natural watercourses in Ireland. Therefore under non-flood conditions it is expected that the external drains identified around Ummeras Bog will act as a hydraulic break to any hydraulic gradient created by bog re-wetting. However there is a risk that should the flow regime in any external drain be changed post rehabilitation that the land adjacent to the drain would become wetter.

There is also a risk that as the bog fills with water and wants to discharge, that unintended discharge locations would occur. A review of the bog boundary was carried out. No low points were identified that may become an unintended discharge location. The south west boundary of the bog discharges via external drains to the Figle River. As such there is a potential risk to the adjacent lands should there be increased flows from the bog owing to elevated groundwater levels. However as previously set out this is based on the ability of the existing boundary drainage network, separating the bog from adjacent lands at a lower level, to provide a positive gravity drainage function in relation to groundwater entering the drain. In other words capacity to convey Q_{med} or 2 year return period flows and a free flow (constantly falling) away from the bog.

Concerns have been raised regarding the risk of rehabilitation may have on groundwater flow pathways. However, it is important to note that Ummeras bog is situated on a dark limestone and shale bedrock, which is classed as a locally important aquifer. This type of bedrock has limited capacity to transmit groundwater, therefore the risk of this occurring is extremely low. No karst features or historic groundwater flooding has been identified in or around the bog. There is therefore no suggestion that the regional groundwater regime would be vulnerable to changes. The rehabilitation plan looks to carefully manage the groundwater levels so that water levels will be at, or very close to, the surface (less than 10cm). In most cases, water levels will be no higher than current winter water levels and no areas of deep water areas are planned within the bog. The head of water that might act upon the bedrock would not be excessive and is unlikely to result in any changes to recharge rates. In addition to this, even in areas where bogs overlay karstified limestone, BnM has successfully carried out rehabilitation works in these bogs. No groundwater flooding through limestone features occurred.

3.2.2 Insufficient Drainage

It is a significant concern for adjacent landowners that restoration and rehabilitation measures could lead to localised impacts in terms of reduced drainage leading to flooding of agricultural lands upstream of the bog.

There is one inflow location to Ummeras bog (Figure 3.2) which connects to a boundary drain which flows north west. Should this drains function and capacity deteriorate, low lying parts of the upstream land may reduce in drainage efficiency. This low lying land was identified and included in the zone of influence (see Figure 3.2).

An assessment of the external drains was carried out in chapter 2. Various features were identified that may reduce the drains flow capacity. Culverts, bends, deposition and flooding backwater were identified as potential features that could reduce flow capacity. The boundary drain which serves the lands in question flows along the northern extent of Ummeras bog and is currently a mix of open drain with culverted sections. The continued drainage of the lands identified is dependent on the continued performance of this drain and as such its ability to freely drain must be retained.

3.2.3 Increased Runoff

Evidence from bogs that have previously been the subject of restoration measures demonstrates that the measures proposed at Ummeras, which are all aimed at reducing runoff and retaining water within the bog, have the effect of reducing the frequency and magnitude of flood events by restoring a more natural

hydrological regime. Restoration / rehabilitation has been successfully applied to numerous Bord na Móna bog sites as well as SAC sites such as Clara Bog (East), Raheenmore Bog, Carrownagappul Bog and Lisnageeragh Bog. Elsewhere, the restoration of peatland catchments in numerous sites across the UK, such as Exmoor National Park in Snowdonia, has demonstrated positive flood alleviation following rehabilitation measures. Monitoring found that this occurred as runoff from the moorland was reduced due to increased storage in the peat.

The risk of increased runoff from Ummeras Bog is low. All rehabilitation measures being proposed will reduce runoff. However there is a potential that if bog re-profiling is carried out as part of the bog rehabilitation measures that the bog sub-catchments will be modified. Changes in sub-catchments could result in certain discharge points draining larger areas. This would result in increased flows that could outweigh the effect of the reduced runoff arising from the rehabilitation. This is a moderately low risk at Ummeras as the re-profiling of the bog will generally result in the same topographical flow paths, catchment watersheds and discharge locations as in the pre-rehabilitation state. However in the absence of a full pre and post rehabilitation runoff model and in line with a precautionary approach it is prudent that all drainage infrastructure from the bog is fit for purpose and retained such that at a minimum capacity to convey high frequency flood events (Q_{med} or 2 year return period) is provided.

3.3 Potential Risk Areas

The assets identified as being at potential risk from flooding or wetter conditions as described in Table 3.1 are shown in Figure 3.4.

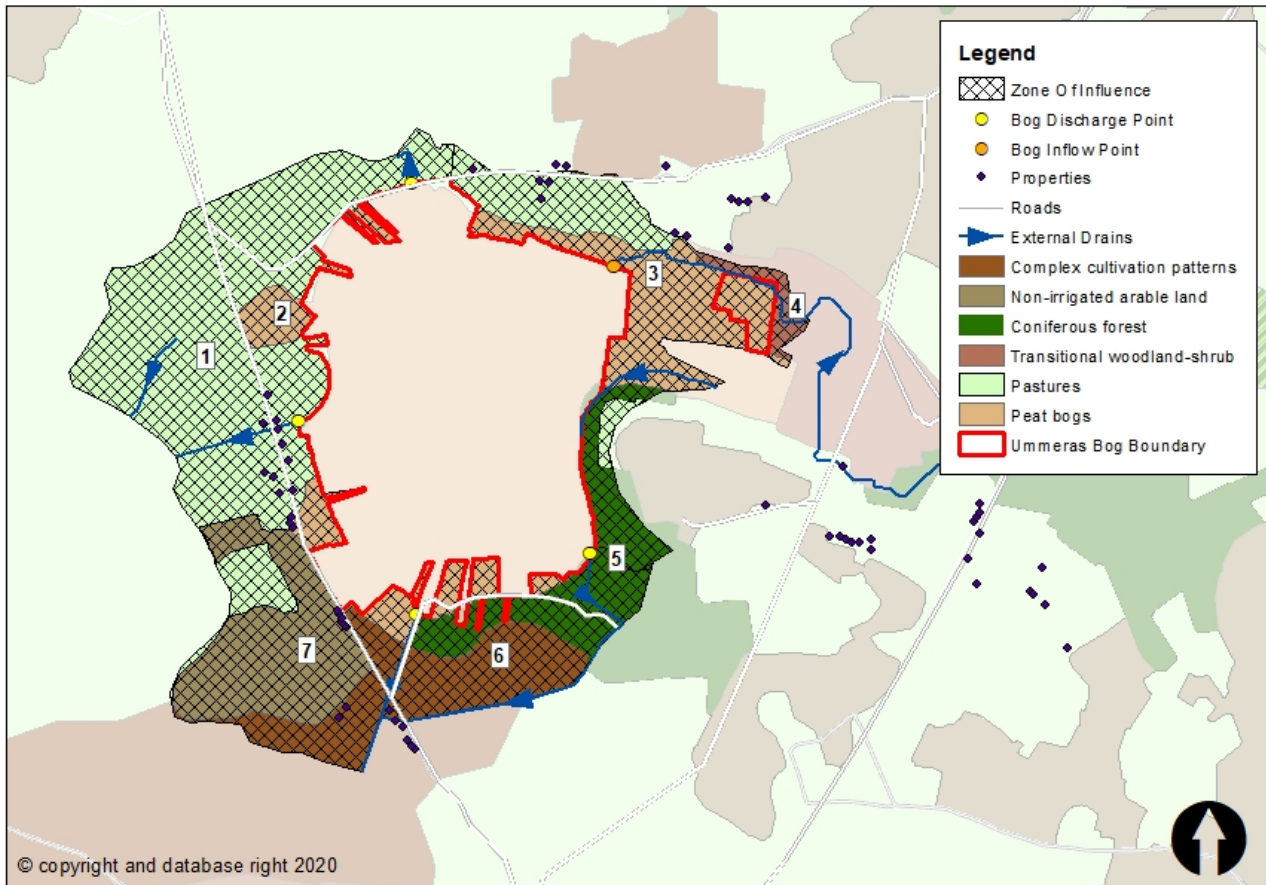


Figure 3.4 Ummeras Bog Rehabilitation Plan – Assets at risk

The assets at risk are set out in Table 3.3 along with the vulnerability, based on the current land use, of the asset. It should be noted that the appraisal of the assets at risk is considering the consequences of flooding or wetter conditions, not the likelihood of flooding or wetter conditions occurring.

Table 3.3 Assets at risk

Item	Asset	Vulnerability to flooding and/or wetter conditions
1	Agricultural land	High Vulnerability. Land would become less productive should it be made wetter.
2	Peat Bog	High vulnerability. Assumed turf cutting. Land would become less productive should it be made wetter
3	Peat Bog and Agricultural Land	Moderate Vulnerability. Land adjacent to bog is peat bog which can tolerate wetter conditions. Bog acts as buffer between Ummeras bog and agricultural land dampening any potential ground water rise.
4	Woodland	Low vulnerability. Land is mainly woodland which could tolerate wetter conditions.

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5	Commercial woodland and agricultural land	Moderate Vulnerability. Commercial trees adjacent to bog require good drainage. Should the ground become wetter the growth rate of the trees may be reduced. Forest acts as buffer between Ummeras bog and agricultural land dampening any potential ground water rise.
6	Peat bog, commercial woodland and agricultural land	Moderate Vulnerability. Commercial trees adjacent to bog require good drainage. Should the ground become wetter the growth rate of the trees may be reduced. Peat bog could tolerate wetter conditions. Forest and bog act as buffer between Ummeras bog and agricultural land dampening any potential ground water rise.
7	Agricultural land	High vulnerability. Land shows signs of improvement with land drains. Land would become less productive should it be made wetter.
8	Roads	Low vulnerability. Road level slightly higher than surrounding land. Risk of flooding is low.
9	Properties	Moderate – High Vulnerability. Although the impact of wet ground conditions or flooding to properties would be considered high, the location of these properties is mostly away from the bog at the limit of the zone of influence or the level of the property is at a higher elevation than the surrounding land. Properties at low elevations are considered high risk. A number of the properties are agricultural sheds which would be more resilient to any potential flood risk.

In addition to the above risks there is a general low risk that should degradation of the bog boundary occur surface water could be released into adjacent lands.

4 OBJECTIVES

The overarching objective of the Ummeras Drainage Management Plan is to facilitate the rehabilitation of bog through management of potential adverse impacts to adjacent land and waterbodies. SMART² objectives were developed for the Drainage Management Plan that provides direction for the overarching objective. These objectives consider constraints, risks and opportunities that were identified in chapters 2 and 3 and are detailed as follows:

1. To manage potential groundwater impacts between adjacent land and Ummeras bog during and after rehabilitation measures.
2. To retain the current drainage capacity of the agricultural land flowing into Ummeras Bog both during and after the rehabilitation measures.
3. To maintain or reduce flows released from the bog at the discharge locations.
4. To reduce sediment entering external drains, the River Figile and River Slate during and after rehabilitation, these measures are to ensure compliance with current discharge limits in IPC Licence.

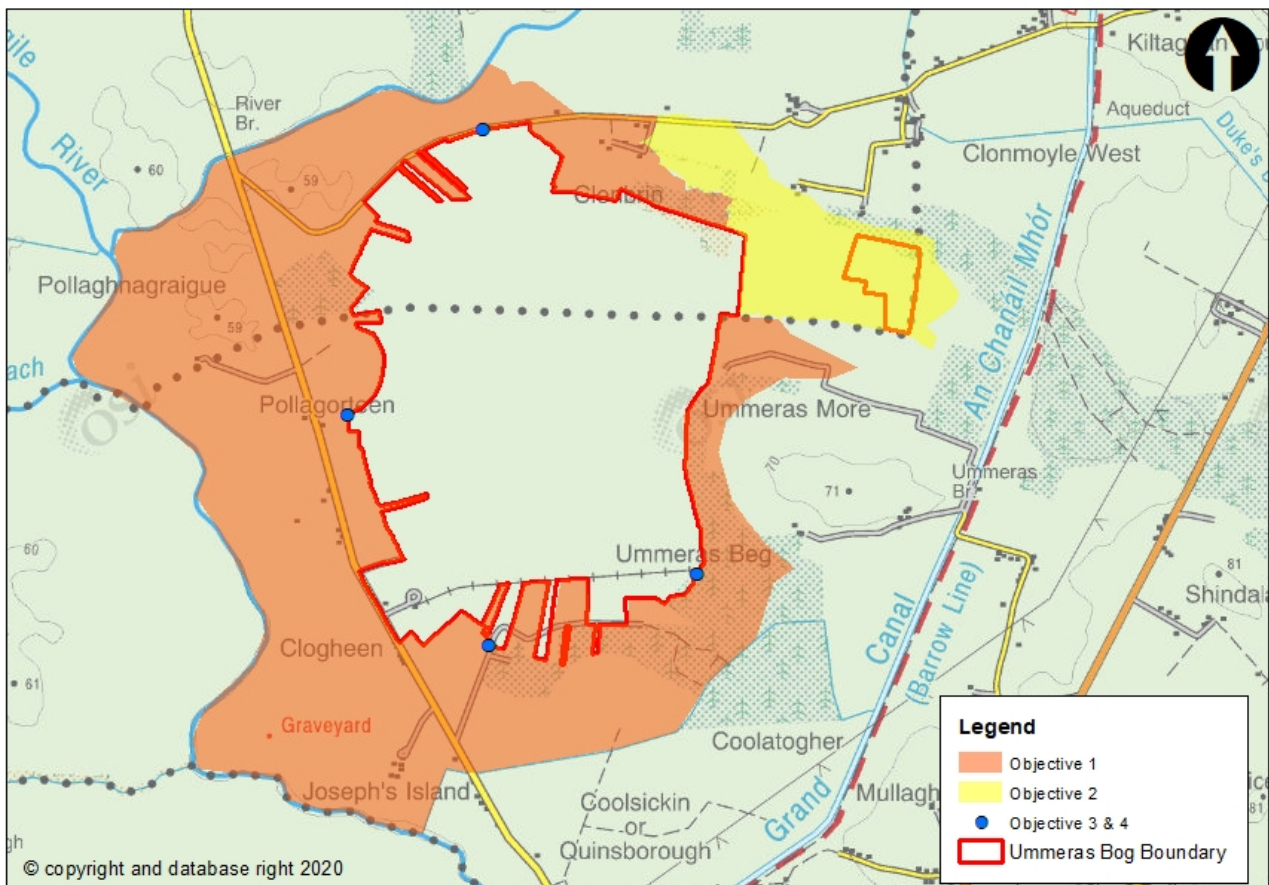


Figure 4.1 Ummeras Bog DMP objectives

² SMART – Specific, Measureable, Achievable, Relevant, Time bound

5 DRAINAGE MANAGEMENT MEASURES

5.1 Key Drainage Features

Drainage management measures were identified in relation to the objectives set in chapter 4 and are described below. Objective 1 considers the potential impact to adjacent land from groundwater rise. Objective 2 considers the existing drainage network flowing into and through the bog. Objectives 3 and 4 consider the control mechanisms to flow discharging from the bog.

An assessment was carried out to identify the key drainage features required to meet the objectives set. Figure 5.1 presents these features. It can be seen in the figure that for groundwater level rise to be managed between the bog and adjacent land that a hydraulic break will be required. To ensure that the land draining into the bog is not impacted the drainage path through the bog will need to be retained. And to ensure that the flow and sediment discharging from the bog is managed the discharge control points will need to be maintained.

Although outside the Bord na Móna bog boundary key external drains were identified. These drains are hydrologically connected to the bog drainage network. While no drainage issues were identified along these external drains, see section 2.4, a risk of sediment deposition was highlighted from sources outside the bog. The maintenance of the existing silt ponds will ensure that the bog will not contribute to an increased risk of sediment deposition arising from rehabilitation. Should this occur drainage from the bog could be impeded and adjacent land could become wetter.

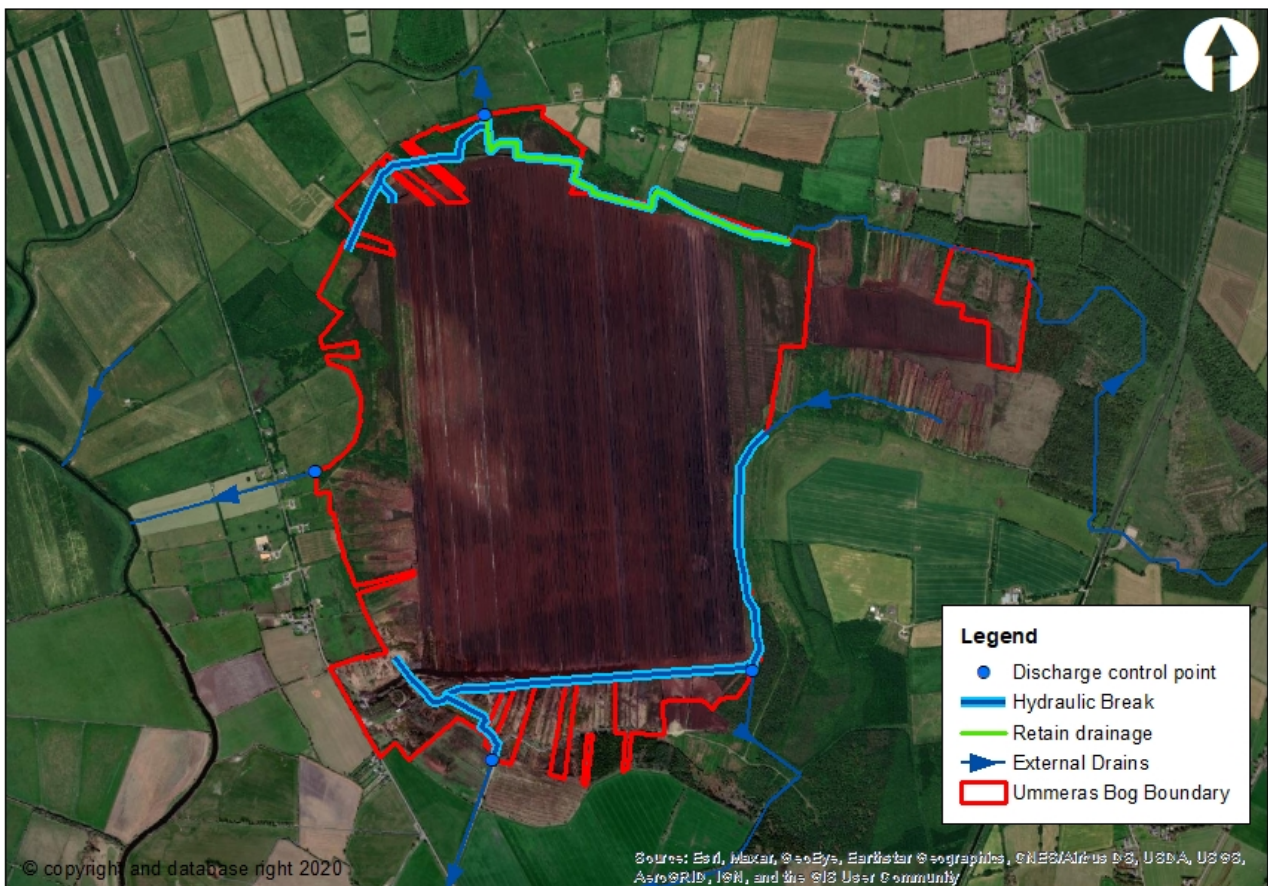


Figure 5.1 Key drainage features for Ummeras Bog

When identifying measures to provide the key drainage features a review was carried out of the drains. The review found that there is limited data available for boundary drains to the bog and external drains within the adjacent land. While data is available for internal drains this was found to be limited also. It was therefore required to produce a Drainage Management Plan that could offer a suite of measures whereby the most appropriate measures can be selected based on the level of robustness and on-site observations. The DMP would therefore allow the bog to be managed and adapted as the rehabilitation plan progresses and is retained in the future. The following sections describe the suite of measures that can feasibly be implemented for the Ummeras Bog Drainage Management Plan.

5.1.1 Boundary Drains

Boundary drains can provide hydraulic breaks between the bog and adjacent land, see Figure 3.3. In most areas of the Ummeras Bog there are existing boundary. Available information indicate that these drains are suitable to provide hydraulic breaks and can be designated as such and retained in the future. Observing and recording the suitability of the boundary drains is recommended and where they are found to be not functioning as predicted upgrade works will be required. This would involve modification of the drain to make them larger/deeper/wider/steeper. This may be only in specific locations along the drain or an entire reach may require upgrading. Where there is no boundary drain present a new drain can be excavated in order to create the hydraulic break required. In these cases a channel of specified dimensions and slope will be required.

5.1.2 Bog Rehabilitation Modification

Where a boundary drain is not suitable to act as a hydraulic break or where none exists it may be possible to review the bog rehabilitation plan to provide the required mitigation measure. This can take the form of sacrificing rehabilitation of the last peat field, closest to the adjacent land where an existing field drain could act to provide the hydraulic break function. The field's drainage network would be retained keeping the groundwater to current conditions and providing a groundwater cut-off in relation to the adjacent land.

5.1.3 Internal Drain Retention

Drains within the bog that include adjacent land within their sub catchment may need to be designated as key drainage features and retained to ensure that the drainage to the adjacent land does not deteriorate.

5.1.4 Maintenance of Silt Ponds

Existing silt ponds are located upstream of the bog discharge points. They help regulate the flow and level of suspended peat leaving the bog into the external drains and rivers. Bord na Móna have legal responsibility to maintain these silt ponds and ensure their proper functioning capacity under the existing IPC Licence (Ref. P0506-01).

5.1.5 Monitoring

As mentioned above DMP measures were selected based on level of certainty and on-site observations. The most appropriate measure was selected from a suite of measures representing varying levels of intervention. Monitoring of the measure and adjacent land will be required prior, during and after the rehabilitation measures. A monitoring programme can be implemented to observe the impact from the bog rehabilitation to the adjacent land. Monitoring would be observational where the condition of the asset in question is assessed in relation to present day conditions accounting for seasonal variability. Where negative impacts are observed other measures can be implemented that will establish a hydraulic break. Otherwise monitoring should continue until environmental stabilisation.

5.2 Drainage Assessment

A review was carried out of the existing drainage networks falling within the key drainage features as shown in Figure 5.1. These drainage networks were reviewed to the confluence with streams in order to identify potential downstream control features.

The estimated flood flows were compared with the hydraulic capacity of each of the control features which are important to the effective performance of the drainage network.

Two methods have been considered for the derivation of the Index Flood flow (Q_{med}) as set out in Section 2.2. There is a high degree of uncertainty in the estimation of flood flows at the small catchment scale and therefore the largest of the two estimates has been chosen for each sub-catchment in line with a precautionary approach to uncertainty. Flood flows for Q_{med} (50% AEP) and Q_{100} (1% AEP) peak flows for each sub-catchment have been calculated. A generalised growth curve for peat catchments in the midlands has been used, whereby a growth factor of 2.3 has been used to scale up the Q_{med} peak flow to determine the Q_{100} event (100 year return period flood event).

The best projections on the effect of climate change have been applied to determine the Mid-Range Future Scenario (MRFS). This represents a 20% uplift over the present day flood flows.

Table 5.1 Peak Flows in Each Sub-Catchment

Sub Catchment	Q_{med} / 50% AEP	Q_{100} / 1% AEP	Q_{100} / 1% AEP MRFS
1	1.563	3.643	4.371
2	0.167	0.388	0.465
3	0.049	0.116	0.139
4	0.037	0.088	0.106
5	0.078	0.188	0.225
6	1.271	3.077	3.692

5.2.1 Assessment Points

Assessment Points have been assigned at key / critical points within the drainage network identified in Figure 5.1 as providing a key drainage management function. The location of the Assessment Points is provided in Figure 5.2.

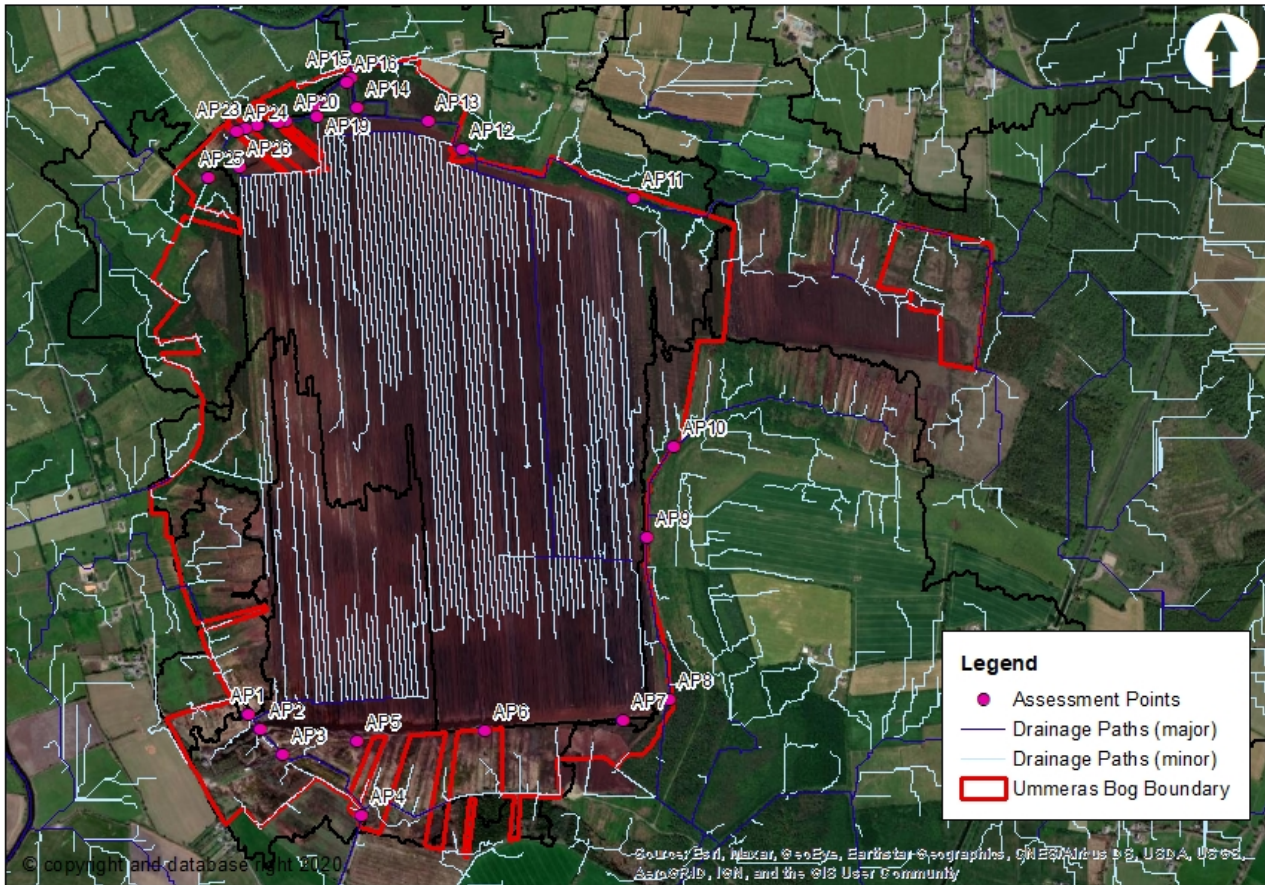


Figure 5.2 Assessment Points at Ummeras Bog

5.2.2 Hydraulic Analysis

The peak flows at each Assessment Point (AP) have been compared to the estimated hydraulic capacity of each of the features. A summary of the flood flows that may be generated at each AP along with their likely capacity to convey these flows is summarised below in Table 5.2. Note that capacity issues at an AP may have knock on impacts in terms of flooding for the AP upstream.

Table 5.2 AP Capacity

Assess. Point	Sub-Catch.	Feature Type	Flood Flow Range (m ³ /s)	Capacity & Recommendations
AP_1	2	Boundary drain	0.004 - 0.012	Likely capacity to convey all flood flows.
AP_2	2	Pipe	0.090 - 0.252	Likely capacity to convey flood flows.
AP_3	2	Pipe	0.099 - 0.276	Likely capacity to convey flood flows.

Assess. Point	Sub-Catch.	Feature Type	Flood Flow Range (m ³ /s)	Capacity & Recommendations
AP_4	2	Boundary drain	0.166 - 0.463	Likely capacity to convey flood flows.
AP_5	2	Boundary drain	0.044 - 0.124	Discontinuous drain. Unlikely capacity to convey flood flows.
AP_6	2	Boundary drain	0.011 - 0.032	No boundary drain at this location (old face bank)
AP_7	2	Boundary drain	0.003 - 0.009	Discontinuous drain. Unlikely capacity to convey flood flows.
AP_8	1	Pipe	0.122 - 0.342	Likely capacity to convey QMED
AP_9	1	Boundary drain	0.111 - 0.310	Likely capacity to convey all flood flows.
AP_10	1	Boundary drain	0.064 - 0.179	Likely capacity to convey all flood flows.
AP_11	1	Boundary drain	1.238 - 3.461	Likely capacity to convey all flood flows.
AP_12	1	Boundary drain	1.408 - 3.938	Likely capacity to convey all flood flows.
AP_13	1	Pipe	1.451 - 4.057	Check pipe capacity when conditions allow.
AP_14	1	Pipe	1.551 - 4.336	Check pipe capacity when conditions allow.
AP_15	1	Pipe	1.557 - 4.354	Check pipe capacity when conditions allow.
AP_16	1	Pipe	0.047 - 0.132	Likely capacity to convey QMED
AP_17	1	Pipe	0.046 - 0.128	Check pipe capacity when conditions allow.
AP_18	1	Boundary drain	0.046 - 0.128	Likely capacity to convey all flood flows.
AP_19	1	Pipe	0.045 - 0.126	Check pipe capacity when conditions allow.
AP_20	1	Pipe	0.017 - 0.049	Check pipe capacity when conditions allow.
AP_21	1	Pipe	0.017 - 0.048	Check pipe capacity when conditions allow.
AP_22	1	Pipe	0.016 - 0.045	Check pipe capacity when conditions allow.
AP_23	1	Pipe	0.015 - 0.042	Check pipe capacity when conditions allow.
AP_24	1	Pipe	0.011 - 0.031	Check pipe capacity when conditions allow.
AP_25	5	Boundary drain	0.066 - 0.191	Likely capacity to convey all flood flows.
AP_26	1	Boundary drain	0.020 - 0.056	Likely capacity to convey all flood flows.

5.3 Identification of Measures

The review of drain capacities found that most open drains are likely to have sufficient capacity to convey flow away from the bog. They would therefore be suitable to act as hydraulic breaks provided they are maintained with their current estimated carrying capacity. One reach along the bog boundary was identified as requiring a higher level of intervention. Section 2.6 indicates how all boundary drains appear to be functioning sufficiently

with no known drainage issues identified along the drain or in adjacent land. Although there is no survey data for some reaches the anecdotal evidence suggests that the boundary drains identified for retention are functional and can be used as drainage management measures. They would therefore be suitable to act as hydraulic breaks provided they are retained with their current estimated carrying capacity. Table 5.3 and Figure 5.3 details the level of intervention required along each reach of drainage network.

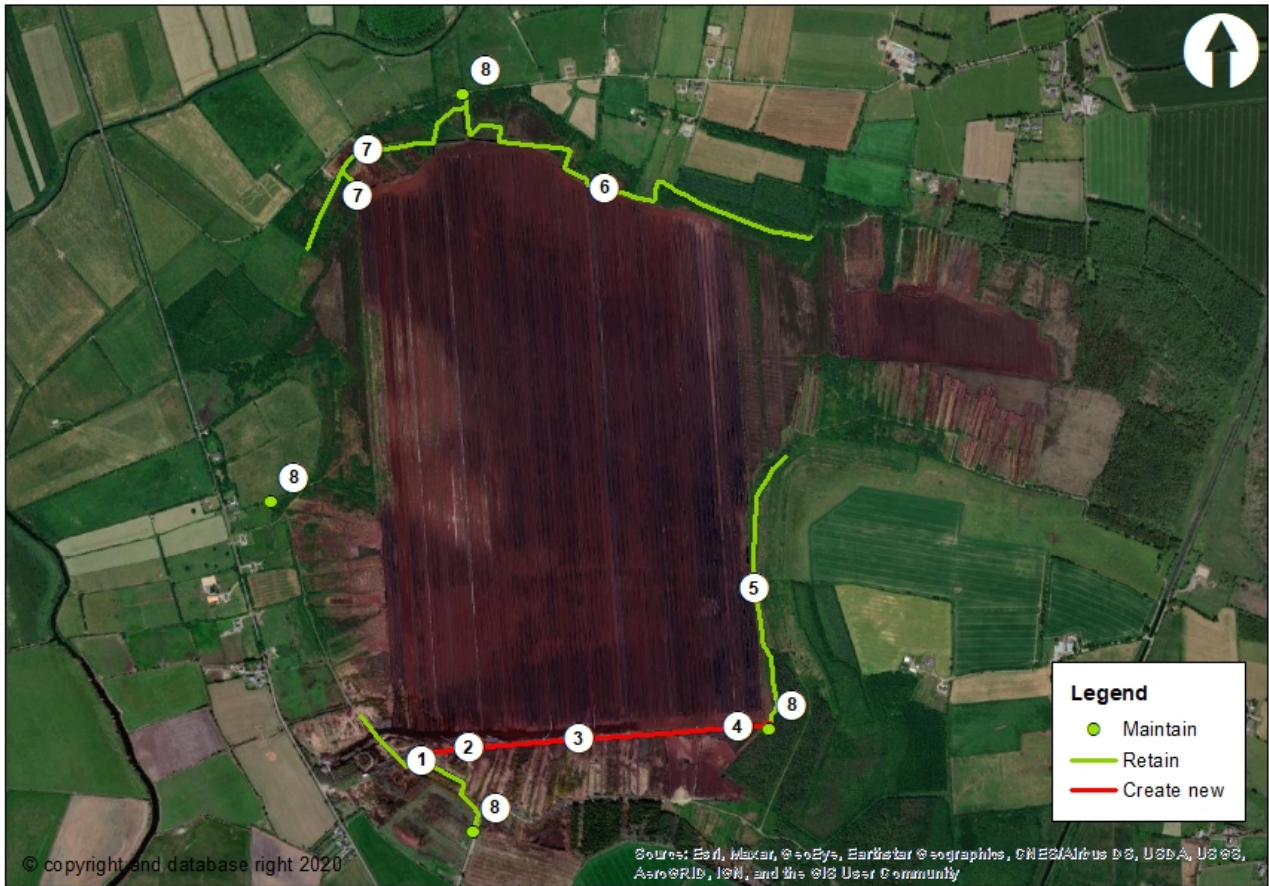


Figure 5.3 DMP measures for Ummeras Bog

DMP measures 2 - 4 refer to the southern boundary of the bog where the boundary drain is intermittent. In some areas there is no boundary drain and the reaches of boundary drain are not connected. A new boundary drain is proposed in this location to act as a hydraulic break to the adjacent land.

The remaining measures are of low intervention consisting of maintaining the existing features or monitoring lands or features.

Table 5.3 Selection of DMP measures

Measures Item	Feature	Function required	Suite of measures Level of intervention			
			Low			High
1	Boundary drain	Hydraulic break	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
2	Boundary drain	Hydraulic break	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
3	Boundary drain	Hydraulic break	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
4	Internal drain	Hydraulic break	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
5	Internal drain	Hydraulic break	Retain drain	Upgrade drain	-	Create new drain
6	Boundary drain	Hydraulic break & Drainage of adjacent land	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
7	Boundary drain	Hydraulic break	Retain drain	Upgrade drain	Maintain outside bog field	Create new drain
8	Silt ponds	Silt and flow control	Maintain pond	Upgrade pond	-	-

5.4 Interaction with Monitoring Plan

As part of the bog rehabilitation plan groundwater level monitors will be installed at Ummeras Bog. These monitors will record groundwater levels over the coming months. It will therefore be possible to ascertain if groundwater is rising within the bog following the implementation of the rehabilitation plan.

This data should be considered during the monitoring measures of adjacent land. When groundwater levels are known to be rising within the bog, monitoring of the adjacent land (as described in Section 5.1.5) should take place on a more regular basis to ascertain if impacts to lands outside the bog are observed.

5.5 Residual Risk and Limitations

The level of flood risk to the bog and the surrounding lands has been shown to be low (Section 2.6). The impact of the proposed rehabilitation measures will generally be to reduce runoff from the bog but this will lead to increased groundwater levels and surface water flooding in the bog itself. There are unknowns in relation to the post-rehabilitation water levels which will be realised, however the Drainage Management Plan seeks to identify the measures that should provide a hydrological cut off between the bog and the surrounding lands.

As indicated in previous sections there are limitations to the assessments associated with the drainage network both within the bog and outside. Factors such as flow estimations of small catchments, lack of survey data limiting drain capacity estimations and high level definition of soil porosity all contribute to these limitations. Nevertheless the measures recommended represent a pre-cautionary approach based on conservative assumptions.

The DMP measures proposed set a baseline approach however a suite of measures in any given location has been provided. This will allow a reactive approach to be taken if required. Should a measure not be operating efficiently a higher intervention measure can be implemented. This will allow Bord na Móna to identify the most appropriate measure while proceeding with drainage function uncertainties.

5.6 Climate Change Adaptability

There is high uncertainty in relation to the effects of climate change, particularly in how it may manifest in terms of small catchment runoff. Ireland is predicted to have drier summers and wetter winters. The most appropriate guidance in an Irish context can be found in the OPW's Flood Risk Management Climate Change Sectoral Adaptation Plan³. For the Mid-Range Future Scenario, representing a central emissions estimate on a 100 year time horizon, it is recommended that allowances for peak flow and rainfall are increased by 20%. If such increases in runoff are realised over the timeframe of establishment of rehabilitation measures this could lead to a perception that bog rehabilitation measures at Ummeras are the cause of increased flood risk.

³ Accessed on 10/12/2020 at

<https://www.gov.ie/pdf/?file=https://assets.gov.ie/46534/3575554721374f7ab6840ee11b8b066a.pdf#page=1>

It is anticipated however that the rehabilitation measures will lead to reduced peak runoff as the water storage function of the bog is increased. This will serve to regulate peak runoff in winter and potentially smooth out the flows in drier periods, essentially acting against the anticipated effects of climate change.

It is therefore anticipated that the bog rehabilitation measures themselves will provide the mitigation of the effects of climate change on runoff and no additional measures will be needed. There are unknowns however in the effectiveness of the rehabilitation measures in this regard and also the severity of climate change impacts. Continued monitoring of the adjacent lands is therefore also crucial to gauge the effectiveness of the BRP measures in mitigating these climate change impacts.

6 SUMMARY OF DRAINAGE MANAGEMENT PLAN

The Drainage Management Plan for Ummeras Bog consists of a series of measures to be implemented at different stages of the rehabilitation measures. Drains along the bog’s boundary were identified as being key drainage paths or hydraulic breaks in order to mitigate against any potential impacts from the bog rehabilitation measures. The effectiveness of all drains acting as hydraulic breaks is dependent on their ability to convey flow which have been outlined in Section 5.3 and deemed appropriate subject to the measures recommended. Factors such as channel size and slope will determine this along with any downstream feature which may control water levels. The external drains which these boundary drains discharge into are also key drainage features that will affect the operation of the drainage network. Measures will range from low intervention to high and consist of monitoring, retention of existing features and creating new features. Maintenance of measures are proposed to the silt ponds within the bog to ensure that discharge from the bog and sediment is controlled. This is a legal obligation for Bord na Móna and will continue at all existing silt ponds. Monitoring of adjacent land was included in the plan. The monitoring will observe adjacent pasture, arable land, bog and woodland for adverse impacts from the bog rehabilitation. Should these impacts be confirmed, higher intervention measures can be implemented to mitigate the impacts. Monitoring measures will therefore be ongoing during and after the bog rehabilitation measures. Continued retention and maintenance of the key drains and silt ponds will also be required after the bog rehabilitation measures. Throughout the process landowner engagement is recommended to ensure both the rehabilitation plan and Drainage Management Plan are understood and to promote collaborative working to manage impacts as they arise.

Table 6.1 Drainage Management Plan

Measures required PRE bog rehabilitation measures	Measures required DURING bog rehabilitation measures	Measures required POST bog rehabilitation measures
Landowner engagement if required via community liaison	Landowner engagement if required via community liaison	Landowner engagement if required via community liaison
Retention of boundary drains (see section 5.1.1)	-	-
Monitoring external drains	IF REQUIRED – Consideration of need for higher intervention measures	-
Maintenance of silt ponds (see section 5.1.4)	Maintenance of silt ponds (see section 5.1.4)	Maintenance of silt ponds (see section 5.1.4)
Monitoring of adjacent land (see section 5.1.5)	Monitoring of adjacent land (see section 5.1.5)	Monitoring of adjacent land (see section 5.1.5)
-	-	IF REQUIRED – boundary drain upgrades beside low and moderate vulnerability land (see section 5.1.1)
-	-	Retention of key drains and pipes