



18th May 2021

Mr. Vincent O'Malley,
Transport Infrastructure Ireland,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

via email to: [REDACTED]

Re: Submission of Natura Impact Statement to the Minister for Tourism, Culture, Arts, Gaelacht, Sport and Media pursuant to the requirements of Regulation 42(9)(c) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

*Lot 2 – Munster Bridges Term Maintenance Contract No. 3 – Culvert Inverts – Group 3
(Derryreag Culvert)*

Dear Mr. O'Malley,

The Department is in receipt of your email dated 6th April 2021 in respect of the project referred to above and has reviewed the Natura Impact Statement (NIS) referred to the Minister in this regard.

The revised Natura Impact Statement (NIS) has been reviewed by the National Parks and Wildlife Service (NPWS) of this Department, in the context of issues raised in our previous correspondence in relation to this matter in August 2020. There are two issues of concern which remain.

1. The project is maintaining the *status quo* in terms of the structure of the culvert, with a fall at its outlet. The appropriate assessment should assess any possible effects of otter mortality due to maintaining the current culvert structure, and assess if otters are likely to cross the road rather than travelling up the culvert during high flow conditions. Also, the possibility of inserting ledges to allow otter access to the downstream outlet of the culvert should be considered. It cannot be ruled out that the otters using this stream are not otters from the cSAC river downstream to which the conservation objectives apply, hence the need to consider this in the appropriate assessment.
2. An ecological clerk-of-works is recommended to be on-site during critical works periods (especially involving initial cleansing, placement of silt control measures, excavation, concrete pouring and use of chemicals), to ensure compliance with mitigation measures, and liaison with IFI staff if required. The sites should be

An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra,

90 Sráid an Rí Thuaidh, Margadh na Feirme, Baile Átha Cliath 7, D07 N7CV

National Parks and Wildlife Service,

90 North King Street, Smithfield, Dublin 7, D07 N7CV

[REDACTED]



examined for breeding otters, 50m upstream and downstream of the culverts, prior to works being implemented at a particular culvert. TII guidelines should be followed in relation to otters.

Yours sincerely,

Gerry Clabby
Head of Ecological Assessment

