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14 October 2019

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Dursey Island Cable Car and Visitor Centre Project
SPA 004155; SAC 002158; Natural Heritage Area 000086

Dear Minister;

We write to seek the intervention of your Parks and Wildlife Service Development Application Unit in a development proposed by Cork County Council for the Dursey Island Cable Car and Visitor Centre Project in west Cork.

Cork County Council have applied to An Bord Pleanala to construct two new cable cars to Dursey Island capable of carrying 200-300 passengers an hour each way with an extensive visitor centre on the mainland. The current capacity is 6 people for a 10 minute crossing. The project includes the construction of 16 passing bays in the 4 km spur from the main Beara peninsula road and is designed to increase visitors to 80,000 per year. [1]

The island is designation is primarily for choughs, listed on Birdwatch Ireland's Birds of Conservation Concern in Ireland (BoCCI) Amber list and on Annex I to the Birds Directive, as well as being protected under the Wildlife Act. The chough was specifically cited by the European Court of Justice in 'The Birds Case' and was included in the Programme of Measures to settle that case:

> The Court further referenced certain bird species as being of particular concern either because of declining numbers or insufficient protection measures afforded to ensure their continued survival. In response, Ireland has identified and classified all suitable locations on the basis of available scientific information within the suite of 154 SPAs for the following species: Red Throated Diver, Hen Harrier, Merlin, Peregrine, Golden Plover, Chough, Kingfisher and Corncrake. [2]

The Local Area Plan General Development Objectives for Dursey Island says that:

> 'This Island is surrounded by the Kenmare River Special Area of Conservation and parts of the Island are within the Beara Peninsula Special Protection Area. This plan will protect the favourable conservation status of these sites. Development proposals as set out above should not be located within the SPA. Development on the island will only be permitted where it is shown that it is compatible with the requirements of the Habitats Directive and the protection of these sites' [3]

The choughs on Dursey Island have recorded a 30% decline since the last survey in 2003, according to the Natura Impact Statement. [See Appendix 4, 'Total Number of Choughs recorded on Dursey Island'.]

Tourism is a well-established adverse factor in the survival of choughs, resulting in 'a severe decrease in the area available for foraging in choughs and a reduction in the time allocated to foraging. This translates into reduced summer juvenile survival and, we predict, reduced population viability.' 'Tourism in protected areas can threaten wild populations: from individual response to population viability of the chough Pyrrhocorax pyrrhocorax'. [4]

Tourism is repeatedly identified as a potential threat to the choughs of Dursey Island:

> "*The potential risks to local bird population of current levels of visitors using the site are mainly centred on the risk of increased disturbance to Choughs which use the maritime grasslands along the peninsula to feed*". [5]

Published scientific literature is at one in relating survival rates to the adverse influence of tourism, as is demonstrated in the paper quoted above ['Tourism in protected areas can threaten wild populations'] based on Ouessant Island, the Parc naturel régional d'Armorique and a UNESCO biosphere reserve .

> 'In summer, the foraging probability of choughs was negatively correlated with the number of visitors. As a result, the time allocated to foraging during peak tourist season, adjusted to day length and prey availability, was 50% lower than expected.'
>
> 'Juvenile survival rates were lowest in August, the peak tourist season, and varied significantly across years. August survival rate and therefore annual survival were negatively correlated with the number of visitors on the island in August and, except for a minor negative effect of rainfall, were not influenced by other environmental variables.'
>
> 'Our results indicate that the presence of visitors on Ouessant Island resulted in a severe decrease in the area available for foraging in choughs and a reduction in the time allocated to foraging. This translates into reduced summer juvenile survival and, we predict, reduced population viability.'

> 'The most obvious physiological mechanism causing the observed excess juvenile mortality is severe undernourishment, due to the reduction in feeding time budget. On Ouessant, three ringed juveniles were found freshly dead in summer without any external parasite or wound. All three exhibited abnormally low weight (162 g, 184 g and 180 g vs. 261–295 g for healthy ringed fledglings) and had suffered severe weight loss since they were ringed 1 or 1 months earlier (–53 g, –94 g and –135 g, respectively). In addition, undernourishment may have acted in synergy with a production of corticoids, often associated with human disturbance (see Sapolsky 1992), to reduce juvenile survival.

The authors of the EIS use this paper to ***support*** their project, in spite of universal subsequent confirmation of the paper's central thesis:

> 'In that study, Choughs selected areas with short swards created by high visitor numbers, but survival of young was lowest when tourist numbers were greatest because inexperienced birds had trouble finding sufficient food when disturbed frequently. Anecdotal observations in Cornwall suggest that even adults move away from preferred feeding areas when visitor pressure is high, from April to October. [6]

While admitting that 'the same methodology cannot be applied to calculate a carrying capacity for Dursey Island' – note Ouessant has a population of 900 and is a mass tourism destination from France with its own airport - they admit in the EIS itself that 'the three known nest sites at the western end of the island [redacted] are potentially vulnerable in this respect' and that 'due to the increased visitor numbers as a result of the proposed development, it has the potential to cause increased disturbance (increased human activity affecting foraging behaviour) leading to reduced breeding success.'

The NIS states clearly

> 'Since the proposed development is likely to cause a significant increase in visitor numbers on Dursey Island and on walking routes in the vicinity of the proposed development on the mainland (at Garinish Head and Crow Head), human disturbance is considered to present a risk of adverse effects on the resident chough population.'
>
> And
>
> 'Considering all of the above, in the absence of effective controls on the numbers or behaviour of visitors to the island during the operation of the proposed development, human disturbance has the potential to adversely affect the conservation status of the resident Red-billed Chough population.'

The EIS further highlights the critical fact of the chough decline on Dursey Island:

> 'There has been a decline in the number of breeding pairs recorded on Dursey Island between the previous surveys in 1992 and 2002/03. The cause of this decline is

ultimately unknown. However, the potential impact of human disturbance as a result of increased visitor numbers cannot be ruled out as a contributing factor.'

The EIS, NIS, and published literature suggest no other factors, such as the condition of the grazing sword, to account for the decline on Dursey Island.

While the 'Zone of influence' of the development is defined as 500 metres and a 500 metre 'buffer' is listed, the documentation supplied suggests that the 'flush distance' ['the distance at which a foraging bird or flock will fly off when approached [i.e. disturbed] by a person or group of persons'] is 50 metres, although the scientific evidence records that nesting choughs forage for 300 metres from nesting sites. [7]

The Bird Survey highlights the presence of large flocks of chough which occur on Dursey Island, especially in the summer months, pointing out that that 'The extreme western end of the island is a key foraging and flock-forming area'. It records that 'In most westerly derelict house; pair seen flying in and out and foraging in vicinity with 3 juveniles observed and fledging later confirmed during nest watches'. [8] [Appendix Figure 2: NIS Plate 2.14 Key areas of chough habitat on Dursey Island]

A visitor study undertaken shows that this extreme western end of the island is visited by more visitors than any other area (26%) [See Appendix Figure 1 Plate 2.16 Heat map illustrating the end point of walking routes taken by visitors to Dursey Island during June and July 2019].

No mitigation is proposed other than 'minimum impact behaviour' (MIB) signage and routing visitors through the more strenuous side of the looped walk first on the grounds that 'Travelling in this direction, walkers undertaking the Tillickafinna/Signal Tower Loop will have had plenty of 'photo opportunities' and will have completed the most strenuous portion of the trail (the 'high route') by the time they reach Tillickafinna and, for these reasons, may feel less inclined to venture further westward.' [9]

The EIA proposes no prohibition on visitors to protect the bird, as this would be counterproductive to the proposal as restrictions are required most in the peak tourist months of July and August. 42% of visitors leave the path when reaching the extreme western end of Dursey Island.

In fact, the capping of the numbers proposed at 80,000 – 12,500 maximum a month – are figures without any scientific authority. The West Cork Island Development Plan 2012 – 2020 specifically listed the production of a Visitor Management Plan as an immediate action but it has never to our knowledge been prepared.

According to the Strategic Environmental Assessment of the County Development Plan 'The SPA protects Chough feeding and breeding sites, as well as areas where birds flock in the wintertime.' Yet even by the developer's minimalistic and unenforceable 50 metre protection zone, '22% of total foraging area will be lost'.

Dursey Island is also protected by an amendment to the 2012 Development Plan which was specifically brought in to safeguard the County's natural assets from the dangers of tourism:

> 'Tourism related developments will not normally be considered in environmentally sensitive locations unless it can be demonstrated that that there will be no adverse environmental impacts both in the short and the long term from the proposed development. This section also needs to state that development proposals will not be considered in Natura 2000 sites.'

We urge you to ensure that this is indeed the case and that your Parks and Wildlife Service, in the absence of specific Conservation Objectives or Management Plans for the area ensure that 'Those communities that are key contributors to overall biodiversity at a site with their low resilience should be afforded the highest degree of protection and any significant anthropogenic disturbance should be avoided.' [10]

Yours etc.
Tony Lowes, Director

References

[1] https://www.corkcoco.ie/en/news/dursey-island-cable-car-and-visitor-centre-development

[2] Judgment of the Court of Justice of the European Union in Case C 418/04 Commission v Ireland "The Birds Case" https://www.chg.gov.ie/app/uploads/2015/09/birds-case-pom-july-2015_0.pdf

[3] http://corklocalareaplans.com/wp-content/uploads/2017/08/West-Cork-MD-LAP.pdf. Page 214

[4] Tourism in protected areas can threaten wild populations: from individual response to population viability of the chough Pyrrhocorax pyrrhocorax, Journal of Applied Ecology, Volume 46, Issue 3, Christian Kerbiriou, Isabelle Le Viol, Alexandre Robert, Emmanuelle Porcher, Françoise Gourmelon, Romain Julliard. First published: 28 April 2009 https://doi.org/10.1111/j.1365-2664.2009.01646.x https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2664.2009.01646.x

[5] CAAS, 2018b; P 62

[6] British Birds, 2011. The return of the Red-billed Chough to Cornwall https://britishbirds.co.uk/wp-content/uploads/2014/05/V104_N08_P416%e2%80%93431_A.pdf

[7] Management for choughs and coastal biodiversity in Cornwall: the need for grazing Kevin Rylands, Claire Mucklow and Leigh Lock June 2012 The RSPB South West England Regional Office Keble House, Southernhay Gardens, Exeter, EX1 1NT

[8] Bird Survey. NIS Appendix 7

[9] Table 18.4 Mitigation and Monitoring Measures for Biodiversity

[10] NPWS Generic Conservation Objectives]

Appendix 1: Tourisms and bird surveys

Figure 1: Plate 2.16 Heat map illustrating the end point of walking routes taken by visitors to Dursey Island during June and July 2019. 26% visit the extreme end of the island, the prime chough foraging area. 42% leave the established path in this area. [EIS 2.9]

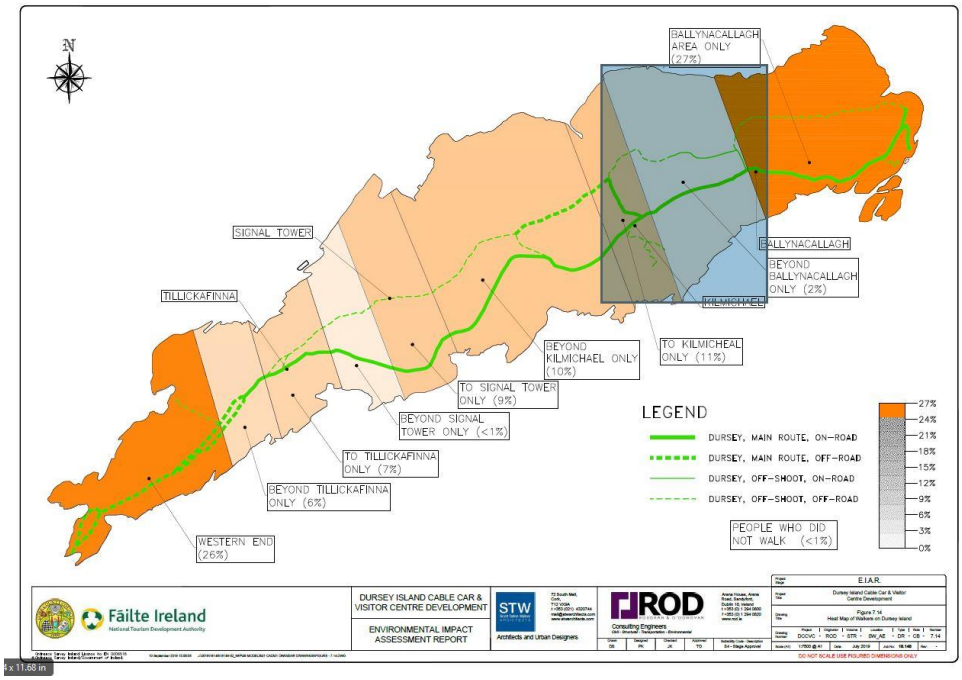

Figure 2: NIS Plate 2.14 Key areas of chough habitat on Dursey Island [Locations of nest sites removed]

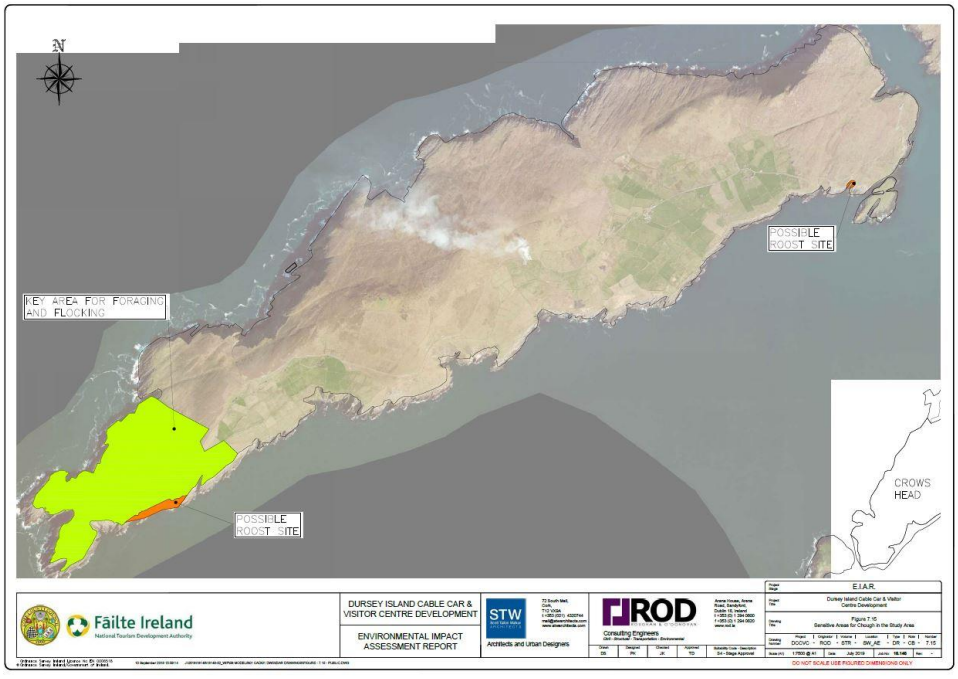

Figure 3: Plate 2.2 in the NIS shows the existing walking route cutting through the prime chough habitat

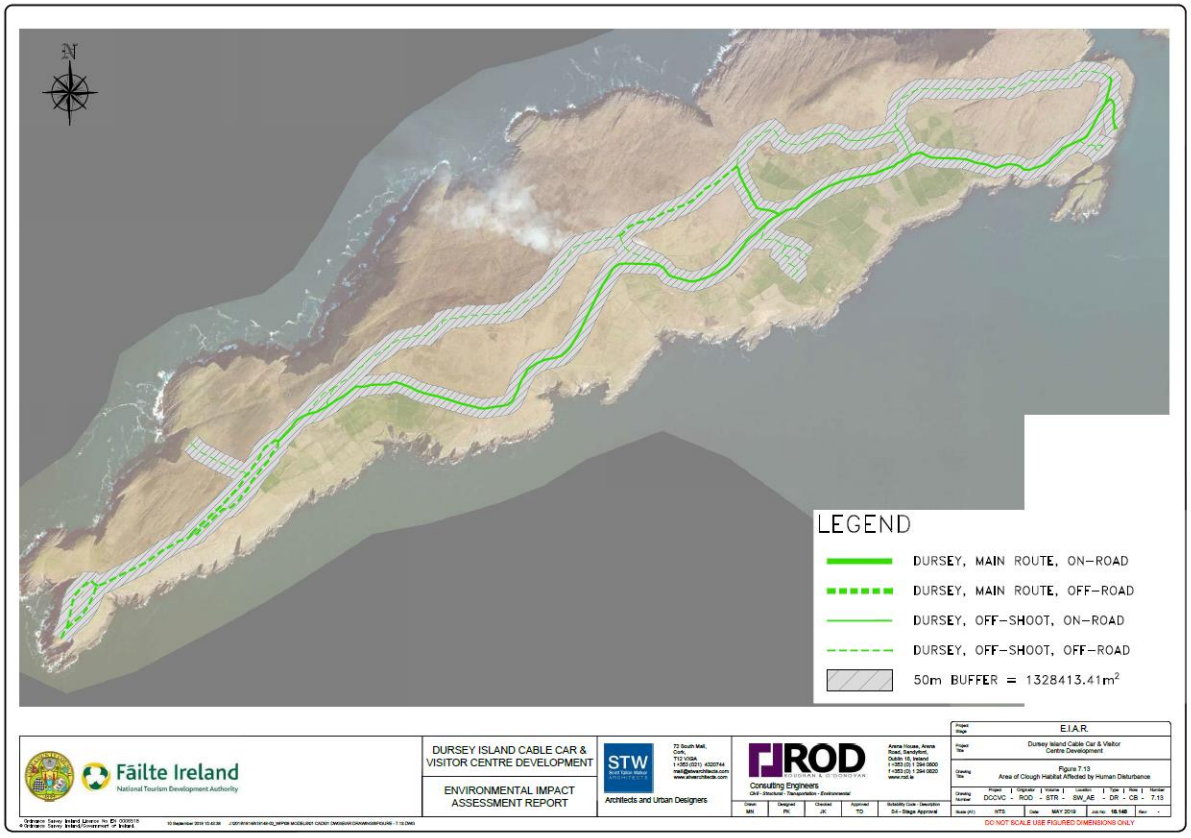

Figure 4: Plate 2.3, NIS shows a 30% decline in the number of choughs since the 2003 survey, corresponding with the increase in visitor numbers and in the absence of other factors, such a grazing condition.

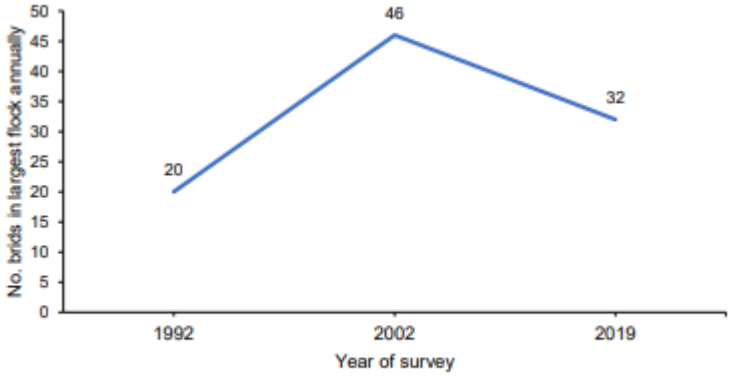

Plate 2.13 **Total number of chough recorded on Dursey Island, 1992-2019. Source: Berrow et al., 1993; Gray et al., 2003; ROD surveys.**