

Wrocław, 19.12.2021

**Road Management and
Maintenance Authority n
Wrocław**

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In relation to the ongoing public consultation on:

Draft Environmental Management Plan for Contract 1B.9 *Modernization of the flood embankment along the Ślężoujście Street with road infrastructure* (further referred to as **DRAFT ENVIRONMENTAL MANAGEMENT PLAN or draft EMP), prepared under Component 1 of the Odra-Vistula Flood Management Project - Protection against flooding of the Middle and Lower Odra, Sub-Component 1B - Protection against flooding of the Middle and Lower Odra**

and having familiarised in detail with the said document, the "Nasze Maślice" Association considers it a gross omission that at the stage of drawing up the Environmental Management Plan (EMP) **no nature inventory was conducted**, in spite of the fact that within Maślice there are areas of high natural value.

The paper only provides that an unspecified group of specialists (no names, no specialisations provided) performed a field inspection (no date specified), and during this inspection no protected species of plants and animals were identified. This statement is far from the truth, as for the embankment under consideration, in fact there is a number of protected species living in its vicinity:

- 1) **more than a dozen bird species** - among others, collared flycatcher, oriole, great spotted woodpecker, blackbird, songbird, great tit, blue tit, chaffinch, blackcap, long-tailed tit, nuthatch, yellowhammer, nightingale,
- 2) **great capricorn beetle** - at least 2 inhabited trees by the pond at the junction of Potokowa Street and Ślężoujście Street and in the forest above the Ługowina river; this species is listed in Appendix II of the Habitats Directive,

- 3) at a distance of approx. 60 m from the embankment, the site of eastern eggar was located (a few cocoons); this species is listed in Appendix II of the Habitats Directive,
- 4) at the modernised embankment grows great burnet, a host plant for the protected Phengaris butterflies (the presence of these butterflies has not been confirmed),
- 5) at a distance of approx. 150 m from the embankment, there is a water reservoir inhabited by several amphibian species including northern crested newt (this species is listed in Appendix II of the Habitats Directive), smooth newt, common toad and common frog.

Taking into account the above-mentioned data, the information contained in the EMP is factually inaccurate and the document is therefore inconsistent.

Thus, the impact matrix table indicates that the investment has no impact on the protected animal species and biodiversity (impact = 0). However, Chapter 6.8.1 provides that the implementation of the Contract affects the local nature and minimising measures are projected. Among them, a nature inventory is planned. It is to be performed prior to the start of the investment. However, if it is done in winter or early spring, the data collected will be of low quality and will not capture all the species.

Also, the assessment made in Chapter 6.8.1 stating the investment will generate no impact at the stage of its operation is beyond comprehension. The authors who published had no knowledge on the local fauna and flora. Part of the construction works is to renovate the road and lay its new surface. So, among others, it will lead to an increase in traffic and car speeding. And it will certainly stand for a significant increase in the mortality of amphibians migrating through the embankment and crossing Rędzińska Street. The issue of amphibian migration and their mortality in Rędzińska Street has been raised for years. The drawn-up EMP should refer to it. At the same time, a series of remedial measures at the stage of the embankment operation should be taken and they should not include only road markers or traffic / speed decelerators.

Tree plantings in the Ługowina area provide a local migration corridor for animals. In line with the table in Chapter 5.16 (Impact Matrix) the road works do not affect migration. Does - in relation to the reconstruction of the bridge structure on the



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Ługowina river - the project include any elements to protect this migration corridor (e.g. reduction of lighting, elimination of barriers, shelves for minor animals)?

Moreover, we would like to remind you of the opinion issued by the Lower Silesian Provincial Conservator of Monuments on Ślężoujście Street (available in full here: www.facebook.com/permalink.php?story_fbid=301101668058640&id=102144857954323), which concluded that the road under consideration ought to be entered in the register of historical monuments. The renovation of this street should take this into account and respect "*the originality and picturesqueness of this road covered with old cobblestones, with granite roadside posts*". Certainly, it would also be beneficial for the nature of Maślice.

We look forward to your response to the above comments.

Regards,



Chairwoman of the Board of
the "Nasze Maślice" Association

Members of
the "Nasze Maślice" Association