



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

30 September, 2019

Dear Ms. Cheng,

**Project Profile for
Drainage Improvement Works in Ta Kwu Ling –
Investigation, Design and Construction**

Green Power would like to draw your kind attention to our comments about the above-captioned Project Profile.

1. Green Power appreciates that the project proponent opts for an environmentally and ecologically less damaging way to manage the hydraulic of natural river courses for flood relieve in above-captioned proposed project. However, precautions are still needed to protect the environment and ecology in planning and design, construction and operation phase.
2. Remark [2] in Table 1.1 of captioned document mentions that “*the concept of revitalising water bodies would be adopted where appropriate to promote greening, biodiversity, beautification and water friendliness in addition to achieving efficient drainage.*” We would like to remind project proponent that for natural river courses, artificial greening, beautification and provision of water friendliness facilities may adversely impact biodiversity of river through habitat destruction/alternation, vegetation clearance/tree felling, introduction of exotic and/or invasive species, human disturbance, etc.
3. Removal of bottom sediment comprising unpolluted natural substrate, which is an integral part of aquatic ecosystem, should be avoided as far as possible to reduce the ecological impacts.
4. Trees, especially native species or of ecological/landscape importance, should be retained as far as possible. Fencing and other measures should be in place to avoid damages/disturbance to the trees during construction phase.
5. While meanders are cut off from the original natural river courses alignment, the size of riparian habitats most probably is reduced. Therefore, abandoned meander management to provide wetland habitats, use of natural bottom lining, provision of shallow ponds and aquatic planting bays at the base of the channels should aim at compensating or enhancing the riparian ecology. Moreover, the ecological and hydrological functions of the abandoned meanders should be preserved as far as possible.

6. Surface runoff generated from the site during construction phase should be prevented from discharging into river channels directly. Also, effluent of surface runoff and sewage generated in build-up areas (i.e. open storages, village houses) should not be discharged directly to or expediently connected to the natural sections of river courses and cutoff meanders in operation phase.
7. We urge the project proponent to accord a high priority for preservation, promotion and restoration of local river ecology and water quality in addition to relieving flood risk.
8. The amount of solid wastes, such as C & D wastes, soil and rocks, contaminated soil generated from the proposed project has not been mentioned in the project profile. As most of the areas adjoining the project site are vehicular accessible countryside places and farmlands, any fly-tipping of such solid wastes generated from this project will be hard to combat. Even if such incidents are spotted, reinstatement can seldom be implemented because of various reasons such as land ownership, landuse zoning and etc.
9. Therefore, generation, transportation and disposal of such solid wastes should be under stricter control, especially for contaminated soil. The mitigated measures to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed project should be considered to be incorporated into the specifications of the works contract.
10. In this works project, vehicular crossing should be built or re-provided with legal or statutory approval. No illegal structures or vehicular access should be rationalized or legalized.
11. We recommend (a) conduct a comprehensive ecological survey and propose measures to preserve or restore the aquatic and riparian ecology, (b) remove any point source or non-point source pollution affecting the water quality of natural river courses, (c) cautiously consider the provision of vehicular access in the proposed projects to avoid any potential eco-vandalism.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610200, F: 2314 2661, Email: lkcheng@greenpower.org.hk).

Yours faithfully,



CHENG Luk-ki
Director
Green Power