



**BY EMAIL ONLY**

**Ms. Maisie Cheng, J.P.**  
**Director of Environmental Protection**  
EIA Ordinance Register Office  
Environmental Protection Department  
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3 October, 2019

Dear Ms. Cheng,

**Improvement of Lion Rock Tunnel Project Profile**

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

1. Green Power objects to the above-captioned Project Profile if the proposed project encroaches  
(a) Beacon Hill SSSI, and/or  
(b) Lion Rock Country Park.

Country Park areas, which are natural asset for well-being and enjoyment of the public, will be permanently lost to manmade and polluting transport infrastructure in this proposed project without any compensation in area and function.

2. The proposed project further isolates the Country Park with the widened Lion Rock Road. Public entrance to Lion Rock Country Park to access to Hung Mui Kuk Nature Trail through Hung Mui Kuk Road is very inconvenient currently and the accessibility for country park visitors will be worsen according to the planned works.
3. Also, the footpaths and picnic areas in Country Park should be well shielded from the nuisance of busy traffic, such as vehicular exhaust gas and noise, during the construction and operation phase of this proposed project.
4. Deterioration of Country Park's environment and functions is well anticipated but no mitigation measures are proposed to address the issues and impacts mentioned in paragraph 2 and 3 above. And environmental and ecological considerations of the above-captioned Project Profile is not comprehensive.
5. All the natural settings of stream courses (i.e. riparian vegetation, especially native, and substratum) should be retained and water channels in the project boundary should be restored with ecologically compatible riparian vegetation and substratum.
6. Surface runoff and effluent generated from the project site during construction phase should be prevented from discharging into stream channels directly. No sewage or polluted stormwater should be directed to natural streams adjoining the project site in operation phase.

7. Hydrological impacts of the proposed project on the streams in vicinity of the project sites are not addressed, e.g. impacts on level of water table, flow volume of existing streams, etc.
8. During construction phase, the main activities that will potentially generate waste include excavation, tunneling (e.g. TBM), demolition and construction of structures. Typical waste types associated with these activities include inert construction and demolition (C&D) materials, non-inert C&D materials, non-recyclable C&D waste, chemical waste and general refuse.
9. The amount of solid wastes, such as C & D wastes, soil and rocks, soil generated from the proposed project will be huge amount. In order to effectively prevent fly-tipping of such solid wastes generated from this project, generation, transportation and disposal of such solid wastes should be under stricter control. 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.

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](mailto:lkcheng@greenpower.org.hk)).

Yours faithfully,



CHENG Luk-ki  
Director  
Green Power