



**BY EMAIL ONLY**

**Director of Environmental Protection**

EIA Ordinance Register Office

Environmental Protection Department

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13 March, 2020

Dear Sir/Madam,

**Environmental Impact Assessment Report for  
Upgrading of Remaining Sections of Kam Tin Road and Lam Kam Road**

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

**Protection of Water Quality and Stream/River Habitats**

1. As the above-captioned Project will encroach several sections of natural streams/rivers and man-made channels in Kam Tin and Shek Kong area, surface runoff and effluent generated from the works areas of the Project during construction phase should be prevented from discharging into stream/river channels directly. Also, washing of equipment, vehicles and clothes are not allowed in streams/rivers.
2. 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.
3. The foundations of roads on stream/river banks and culverts connecting streams/rivers should be constructed by precast concrete parts. "Pour in site" concrete moulding should be avoided.
4. For streams/rivers with natural beds and/or banks, disturbance or destruction of natural banks and beds should be avoided by provision of wider distance between bridge foundations.

**Tree Protection**

5. According to the above-captioned EIA report, 2049 trees were surveyed within the project boundary from September to November 2018. However, extensive tree collapse occurred over the territory during the passage of Severe Typhoon Mangkhut near Hong Kong on 16 September, 2018. We would like to enquire whether this tree survey included the collapsed trees caused by Typhoon Mangkhut. If the original positions of these collapsed trees are assessed as directly impacted by the Project that need to be felled or transplanted, replantation should be considered to restored the original environmental benefits provided by those collapsed trees.
6. In order to prevent damages to the retained trees involved in the Project, protective measures should be in place and strictly observed by the contractors which include but not limited to:
  - (a) Avoid pruning of main branches, pressing the tree roots and soil around tree roots, and injury to tree trunks, main branches and bark.

- (b) Avoid storage of fuel, chemicals and sewage near to the trees.
- (c) Avoid any open-burning, especially under tree canopies.
- (d) Avoid unnecessary excavation and root cutting.
- (e) Avoid hanging heavy objects on the branches

**Hill fire Prevention**

- 7. As hill fires are quite frequent on the slopes near to the Project area. Also, substantial lengths of roads involved in the Project encroach or are near to Conservation Area and Country Parks, measures to prevent hill fires should be formulated that include but limited to
  - (a) Smoking ban in works areas.
  - (b) No storage of inflammable chemicals in the works areas.
  - (c) No ignition and open burning in works areas.
  - (d) Proper clearance of refuse in works areas.

**Prevent Waste Dumping**

- 8. Proper treatment of C&D materials generated from the Project can reduce wastes and avoid fly-tipping in farmlands, fishponds or rural areas nearby. However, in construction phase, the C&D wastes will be generated in different sections of the involved road segments. Therefore, trip-ticket system may not be effective to ensure the proper treatment of C&D waste generated from scattered, small construction sites without firm hoardings and surveillance personnel.
- 9. We urge the proponent should further clarify to EPD how to ensure proper collection, storage, transportation and treatment of C&D waste in addition to trip-ticket system.

Thank you for your kind attention.

Yours faithfully,



CHENG Luk-ki  
Director  
GREEN POWER