



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)

23 March 2021

Dear Ms. Cheng,

**Environmental Impact Assessment Report for Drainage Improvement Works Near Four Villages
in Yuen Long - Sung Shan New Village, Tai Wo, Lin Fa Tei and Ha Che**

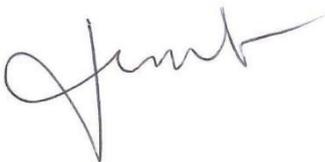
Green Power would like to draw your kind attention to our comments about the above-captioned EIA report.

1. The channel bed and riparian zone designs (Section 5.9.13 to 5.9.22) aiming to retain and recreate the natural stream habitats are appreciated. However, any newly formed man-made landscape in the channel can be subsequently destroyed by the natural water flow especially after a rainstorm. The “Habitat Creation and Management Plan” (Section 5.9.21) should include a contingency maintenance plan to cope with these anticipated destructions.
2. The plant species utilized for the habitat restoration works should be native in Hong Kong and adaptive to the instream and/or riparian environment. The project proponent is recommended to liaise with green groups on the selection of plant species. Active vegetation maintenance is necessary during the operation phase to maintain the ecological function of the restored habitats.
3. The provision of wire mesh along the proposed railings (Section 5.9.23) may trap the wild animals that try to penetrate the mesh. The project proponent should consider another wildlife-friendly barrier such as the wooden plate.
4. The existing trees alongside the major work areas should be preserved as far as possible. A “Tree Preservation and Protection Plan” as requested by the governmental guideline¹ shall be submitted before undergoing the improvement works.
5. The Cheung Po Ecologically Important Stream (EIS) should be isolated from the working areas. Besides deploying barriers along the southern boundary to the work site of the proposed Tai Wo channel (Section 5.12.5), the riparian area of the EIS should be designated as “no-touch zone” to prohibit any construction-associated activities (e.g. construction material storage, worker lounge, etc.).

6. In order to avoid adverse pollution from first flush during rainstorm, regular maintenance desilting is recommended for proposed channels to remove excessive silts, vegetation, debris and obstruction in operation phase (Section 6.7.18). However, such maintenance desilting practice should not jeopardize the ecological functions and implementation of "Freshwater Crab Translocation Plan" (Section 5.9.7) and "Habitat Creation and Management Plan" (Section 5.9.21), especially when "engineers" and "contractors" will be in charge the conservation plans rather than "ecologists" (Table 12-3). The competence of engineers to devise a working plan for conservation of endangered species is dubious as it is not their priority job and such administrative arrangement is irresponsible in context of executing EIAO.
7. Redundant excavated fill materials generated from the works should be properly stored, transported, and finally disposed of at the designated disposal site. The project proponent can incorporate deterrent clauses in the works contract to monitor the transportation and disposal of solid wastes such as installing GPS devices on the dump trucks.
8. Any connection of additional water outfalls (especially those originating from the village houses) to the proposed channels should be strictly forbidden during both the construction and operation phases.
9. The designated Grade-3 historic building Lee Tak Bridge, located next to the Lin Fa Tei's work site, should be preserved. Not only the monitoring works proposed in the EIA report (Session 10.10.6), the workers should always cross the bridge below a certain load limit.
10. For pedestrian crossings re-provided along the proposed works, the crossings should not be upgraded to vehicular accesses or the environmental impact assessments results in the statutory EIA report will be rendered not applicable. Any such alternation of project nature, if happened, should undergo proper statutory procedures supported with sound and acceptable needs.

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

Yours faithfully,



LO Wing-fung
Assistant Senior Education & Conservation Officer
Green Power

Reference:

¹ HKSAR (2006) General Specification for Civil Engineering Works (Session 26 Preservation and Protection of Trees). Available from:

www.cedd.gov.hk/filemanager/eng/content_72/GS%202006%20Vol%202%20Rev%2021-201229A.pdf