



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)

14 July 2021

Dear Ms. Cheng,

Project Profile for Northern Link

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

Railway alignment

1. The captioned railway project comprises the tunnel, viaduct, and at-grade section (Section 3.1.1) whereas the Project Profile does not indicate the tentative length of each type. The project proponent should assess the environmental impacts of alternative alignment combinations and explain why the selected option is preferred in the environmental and ecological context to the others.
2. From previous experiences, the at-grade or viaduct alignment of West Rail Line destroyed and fragmented the farmlands, wetlands, and other habitats in Kam Tin area that significantly degraded the ecological value of Kam Tin area. It also cut the original access and paths that caused segregation of rural communities. Therefore, it is recommended to adopt an underground tunnel railway option for the proposed Northern Link, whenever practical, to minimize the permanent environmental/ecological impacts such as habitat fragmentation and noise pollution, and to avoid rural community segregation as well.

Habitats of concern

3. Locations of EAP/EEP/ventilation buildings (Section 3.1.1), temporary/offsite works areas, and works sites (Section 3.1.2) have not been designated which should not occupy, even temporarily, wetlands, fishponds, active farmlands, and natural habitats, especially the nearby Wetland Conservation Area and Wetland Conservation Area. If the alternative is unpractical, comprehensive EIA and mitigation measures for the affected habitats should be taken.

4. Site formation works encroaching river channels (Section 3.5.1) should be avoided as far as possible so as not to disturb the aquatic habitats and associated wildlife, especially the waterfowls, and not to pollute the rivers which feed the Inner Deep Bay where the designated Ramsar Site and SSSI is located.
5. Construction activities or temporary uses at the West Rail mitigation wetlands (Section 3.7.3) should be avoided as far as possible or adequately compensated. The project proponent is recommended to liaise with green groups when new mitigation wetlands are to be designed and constructed.
6. Loss of Shek Wu Wai wet agricultural lands (Section 3.7.5), and other farmlands and fishponds (Section 3.8.1), though temporarily, must be compensated with comprehensive and effective restoration and monitoring plans in an ecological context.
7. Any egretries and roosting sites of egrets and herons impacted by or in the vicinity of the Project site should be fully assessed and monitored (Section 3.7.6. & 3.7.7). Since the location of egretries may shift from time to time, the monitoring plan and mitigation measures should be adaptively adjusted accordingly.

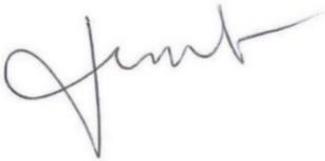
Environmental impacts

8. The alignment of proposed Northern Link would pass through a large area of private lots (Section 4.1.1), it will likely affect some existing brownfield operations. If so, proper relocation or compensation plan should be formulated at the early stage to avoid future uncontrolled expansion of brownfields that certainly brings adverse environmental impacts to the nearby rural areas.
9. Redundant construction and demolition materials generated from the proposed Project (Section 3.5.1) should be properly stored, transported, and finally disposed of at the designated disposal site. Fly-tipping and illegal dumping should be strictly prohibited during the construction phase because the areas around the Project site are notorious for the destruction of ecological sensitive sites by massive dumping of wastes and debris, especially C&D waste. Regrettably, restoration of filled farmlands, fishponds, or wetlands is non-enforceable, inefficient, or impractical in most cases.
10. Non-point source pollution and site surface runoff should not be discharged or directed to the watercourses during the construction phase. The zero-discharge policy in Deep Bay Area should be strictly observed for the discharge of wastewater for the Project. In addition, alternation of the existing natural watercourses should be minimized as far as possible.

11. Hydrological impacts of the proposed Project on the underground water should be addressed for the tunnel option.
12. Regarding the conservation of trees (Section 3.10.1), mature trees should be preserved in-situ as far as possible. Transplantation should only be considered as a last resort to preserve the trees. Regarding tree transplantation, the destination sites should be fully available and well prepared before the trees are removed from the original sites. Direct transplantation is preferred to the temporary nursery.

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,

A handwritten signature in black ink, appearing to read 'Wing-fung', written in a cursive style.

LO Wing-fung
Senior Education & Conservation Officer
Green Power