



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

8 October 2021

Dear Sir/Madam,

EIA report for Revised Trunk Road T4 in Sha Tin

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

1. According to the predictions of the mitigated construction noise assessment at the representative NSRs (Section 4.8.1.7), several NSRs (e.g. STC, RP, STTV, TTU, PTH, TPHS) will suffer from a maximum noise impact that merely fulfils the noise criteria. Even though restriction measures will be implemented for the two critical NSRs (EBI and CC) during the examination period, they will still predictably receive a noise impact reaching the cap of the noise criteria (Section 4.8.1.10). The project proponent is recommended to prepare extra mitigation measures and contingency plans to cope with any exceedance of noise criteria during the construction phase.
2. Non-point source pollution and site surface runoff should not be discharged or directed to any natural watercourses during the construction phase. Alternation of the existing natural watercourses should be avoided as far as possible.
3. House Swift (*Apus nipalensis*), a bird species highly adaptive to human structures, are found nesting underneath the Shing Mun Tunnel Road inside the project area (Appendix A). The proposed project will induce direct impacts on this bird species but it is not mentioned in the EIA report. It is urged to assess the impacts on the swifts and mitigate them by adaptive measures. Besides, the proposed T4 carriageways should adopt a swift-friendly design as compensation.
4. The noise barriers in use for the proposed project should be well designed such that they are highly visible to avifauna to avoid the potential risk of bird collision.
5. The destination sites for the transplantation of affected flora (Section 8.11.3.4) should be fully available and well prepared before the plants 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,

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

Appendix A: Locational map of the nests of House Swift

