



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaoccomment@epd.gov.hk)

18 October 2021

Dear Sir/Madam,

Project Profile for Tuen Mun Bypass

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

1. The proposed Tuen Mun Bypass consists of a tunnel penetrating the Tai Lam Country Park. The potential infiltration or drawdown of groundwater due to the tunnel construction will alter the hydraulics of the natural streams and reservoirs on the ground level. It may hence affect the aquatic ecosystem and reduce the water gathering function of the Tai Tam Country Park catchment. Unfortunately, such environmental impacts can be catastrophic but hard to estimated and mitigated.
2. In fact, there is an alternative alignment (indicated by a green dashed line on the map in Appendix A) connecting the Lam Tei East Interchange and Lung Mun Road by largely adopting the previously proposed Tuen Mun Western Bypass (red line). This alternative alignment can avoid the ecologically sensitive areas, Exxon Mobil Liquefied Petroleum Gas Store, and Tuen Mun Typhoon Shelter; meanwhile, it can shorten the length of the Bypass. The project proponent should consider all the possible alignments in the EIA process and identify the best option with minimal environmental impacts. Clear justifications should be provided to explain why the options are selected or not selected.
3. Destruction of natural habitats, such as woodlands and natural stream courses etc., should be avoided as far as possible. Loss of natural habitats should be fully compensated by effective habitat enhancement or restoration.
4. Tuen Mun District is highly prone to air pollution which ranked the top most polluting districts in terms of the number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 according to the EPD's yearly average Air Quality and Health Index (AQHI) data from 2014 to 2021. The project proponent should conduct a traffic impact assessment to evaluate the expected change in traffic flow on Tuen Mun Road in the operation phase and the associated impact on the air quality in Tuen Mun town. The proposed project should not intensify the air pollution problem within the EIA's study area and the Tuen Mun town.

5. The proposed project, especially the construction of the tunnel, will generate a large amount of construction and demolition (C&D) materials. The project proponent should be responsible for ensuring all the C&D waste produced from the project will be properly stored, transported, and finally disposed of at the designated facilities and/or environmentally treated. Unauthorized disposal of the C&D materials should be strictly prohibited. The project proponent could consider applying real-time GPS tracking technology to trace the tracks of the dump trucks with designation of forbidden zones for them. Deterrent clauses should be incorporated in the work contracts to monitor and penalize any fly-tipping activities.
6. The final alignment of the Tuen Mun Bypass will unavoidably fall nearby the restored Pillar Point Valley landfill. The use of explosives may ignite the flammable landfill gases and induce hazards to human life. A comprehensive landfill gas hazard assessment must be conducted to cope with this potential risk.

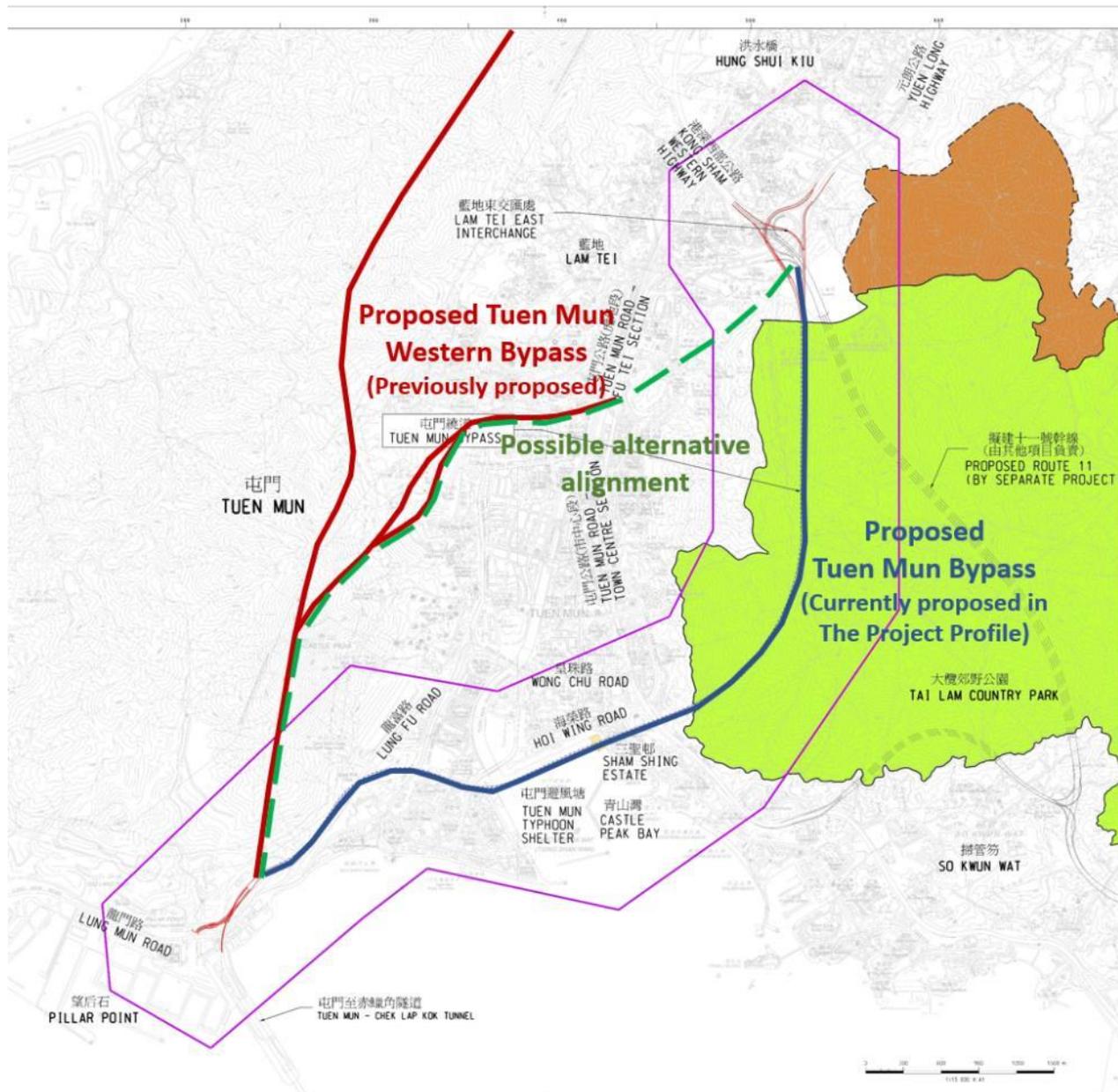
Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610200, F: 2314 2661, Email: wflo@greenpower.org.hk).

Yours faithfully,

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

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

Appendix A: Alternative alignment of the Tuen Mun Bypass



(Map extracted from the Project Profile)