



BY EMAIL ONLY

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Director of Environmental Protection /
Permanent Secretary for the Environment
EIA Ordinance Register Office
Environmental Protection Department
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Dear Miss Tse,

**Green Power and Eco-Education & Resources Centre's Comments on
the Report of Environmental Impact Assessment Study for Tung Chung Line Extension
(EIA-227/2021)**

Green Power and Eco-Education & Resources Centre would like to express our comments regarding the captioned EIA report.

Long-term preservation of Tung Chung River-cum-Bay system

1. Tung Chung River is one of the few remaining major streams in Hong Kong which has not been overly affected by channelization or water pollution. Largely retaining its natural state from headwaters to estuary, Tung Chung River is unique in the local context. The high connectivity and continuity of the river system from the montane area to the estuary, as well as diverse habitat types available in the surrounding land area make the valley exceptionally rich in aquatic, terrestrial and coastal biodiversity, and accommodate species of ecological importance, e.g. Beijiang Thick-lipped Barb (北江光唇魚 *Acrossocheilus beijiangensis*), Philippine Neon Goby (紫身枝牙鰕虎魚 *Stiphodon atropurpureum*), Romer's tree frog (盧氏小樹蛙 *Liuixalus romeri*), Chinese Horseshoe Crab (中國鱗 *Tachypleus tridentatus*), Seaweed Pipefish (舒氏海龍 *Syngnathus schlegeli*), Swinhoe's Egret (黃嘴白鷺 *Egretta eulophotes*), Mangrove Skimmer (斑灰蜻 *Orthetrum poecilops*), Common Birdwing (裳鳳蝶 *Troides helena*) and Eurasian Eagle Owl (鵰 *Bubo bubo*).
2. The Tung Chung Line Extension Project (hereinafter referred to as "the Project"), with part of its footprint situated on or in immediate vicinity of the Wong Lung Hang mangrove stand, which is an integral part of the unique and ecologically sensitive Tung Chung River-cum-Bay system, would directly impact the fragile system through habitat destruction, or indirectly through pollution and vandalism during the construction and operational phases.

Strict implementation of tracking of construction vehicles

3. We support the tracking and monitoring of vehicle routes through GPS or equivalent systems, and opine that control of vehicle activities should be strictly implemented through alarm and penalty systems to deter vehicles from engaging in illegal dumping activities, especially when there is going to be a temporal gap between the start of generation of C&D materials and the operation of the barging point, and that large amount of C&D materials needed to be transported to designated facilities via land route before the barging point can operate (~140 trucks / day and 11 trucks per day for inert C&D materials and non-inert C&D materials respectively, section 6.2.2.23). Penalty terms for deviation of vehicles from designated areas / routes should be clearly listed in relevant contracts for better control.
4. Large vehicles, construction / dump trucks and similar machineries must be prohibited from entering the section of Tung Chung Road between Ha Ling Pei and Shek Mun Kap, all sections of South Lantau Road, Cheung Tung Road, and the majority of Chung Mun Road. Vehicles that have justified reasons for entering need to seek formal approval from relevant authorities and be closely monitored.

Strict delineation and maintenance of work site and area boundaries

5. The proposed Tung Chung West Station will encroach the estuary of Wong Lung Hang Stream, where any disturbance and pollution generated by construction works (e.g. dredging, site formation, stockpiling of materials, surface runoff etc.) will impact Tung Chung Bay directly. This is of particular concern as the Project proposed to construct the underground station and tunnel portal by cut-and cover method which generates large amount of fill materials that need to be disposed of.
6. While we highly agree with the adoption of measures which allows clear and strict delineation of boundaries for all work sites and areas (section 8.9.11), we also need to highlight the importance of effective management of the project workforce, including prohibiting all the contractors, subcontractors and associated service providers of the project proponent from using areas beyond the outlined areas in the EIA report as work sites / areas.
7. The project proponent shall not use any of the ecologically important areas and their vicinity (including Areas 38A, 38B, all CPAs, CAs, freshwater bodies and area with important species recorded in any ecological studies) within Tung Chung Valley OZP as site options for any structures associated with the station, including above-ground entrances, vent shafts etc. Also, the project proponent, including its contractors, subcontractors and associated service providers shall not use these areas as construction sites, including but not limited to works areas, site offices, barging points, vehicle parking, equipment and C&D material storage spaces or other related activities. The boundaries of these sites shall be well defined and maintained.

Prudent control on sewage discharge

8. We urge that no sewage and effluent shall be directly discharged from any construction sites into Wong Lung Hang stream and Tung Chung Bay.

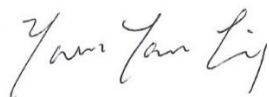
9. Discharge points and boundaries for treated sewage should be designated in a precautionary manner (i.e. avoidance of no-go areas at the beginning stage, including all ecologically sensitive areas and areas upstream of them). Efficiency of sewage treatment facility should be ensured by regular checking and maintenance work, particularly during the wet season and before rainstorms.
10. As the existing statutory water quality objectives (WQO) have not been proven to be suitable for the survival and reproduction of aquatic life, control of water quality around project sites should be enforced in more proactive and stringent manner to protect the survival of freshwater and marine organisms. Monitoring of water quality parameters in water bodies nearby the construction sites (in addition to treated sewage discharge points) is an essential control measure, and shall be included in the Environmental Monitoring and Audit (EM&A) process and conducted with thresholds specially set according to well-documented natural water quality levels at or around these water sensitive receivers before construction begins (i.e. set according to published results or data from EIA).
11. Any discharge points of surface runoff generated from the construction sites and treated sewage should not be located at or in vicinity to any freshwater or marine ecologically sensitive areas identified. Silt curtains should be installed to confine any muddy effluent discharge from these discharge points.
12. Chemicals and toxic substances should not be stored, left over or discarded in the construction/works sites or any places that are prone to flooding or will generate surface runoff discharging to freshwater and marine ecologically sensitive areas identified, including Tung Chung Bay and Tai Ho Bay.
13. Any leakage or spillage of bentonite to natural water bodies must be avoided and closely monitored.
14. Green Power and Eco-Education & Resources Centre conducted survey in Tung Chung Bay in 2012 and found that Tung Chung Bay is of high ecological importance for pipefish (GP & ERC 2012). Also, larvae of economical species, including those of families Callionymidae, Clupeidae, Engraulidae, Gobiidae, Sciaenidae, Sillaginidae, Lutjanidae, were found. Findings of the Administration's ecological and fisheries survey confirm that Tung Chung Bay is an important spawning and nursery ground for sea horses and other marine life, and a rich fisheries resources site. The particularly rich diversity of fishes at Tung Chung River estuary and presence of species of conservation concern recorded by a recent study conducted by Green Power within its valley also confirm the river system continues to be an ecological hotspot (GP 2021). We are highly concerned about the impacts of the construction works to the water quality and ecology of Tung Chung Bay, given the proximity of the construction sites to the sensitive ecosystem.
15. In order to avoid alteration of physical setting, damages to ecology and deterioration of water quality of natural streams in the area, all stream courses and water channels, their tributaries as well as small streams with unclear sources (such as that flowing into the Wong Lung Hang mangroves), and their riparia should be avoided from any construction sites, diversion, excavation, shotcreting, paving of beds and banks, stockpiling, and any sewage and effluent discharge during both construction and operational phases.

Constant monitoring and contingency planning for species of conservation concern

16. Although most species of conservation concern (e.g. Romer's Tree Frog *Liuixalus romeri*) were not found within the working sites or areas during the EIA study, the proximity of such areas to their known habitats also requires attention. Apart from measures to avoid the spread of such species into the work sites / areas (e.g. removal or coverage of temporary water containers which may attract the Romer's Tree Frog by acting as breeding sites), constant monitoring of the presence of these species during the construction phase is also important. In cases where individuals of such species are found within the works sites or areas, translocation by qualified personnel according to a well formulated protocol should be conducted, and such monitoring and contingency plan should form part of the EM&A practice given the presence of such species in close proximity to the project sites.
17. In operation phase, the greening or ecological mitigation measures should be considered for Tung Chung West Station to provide a buffer zone between Yat Tung Estate and Wong Lung Hang. The buffer zone could carry out function of filtering the surface runoff generated from built-up areas before draining to Wong Lung Hang to reduce the impact of non-point source pollution. On the other hand, it relieves the urban heat island effect and mitigate visual impacts, and echoes the ecologically importance and hiking hub status of Tung Chung River Valley *cum* Bay.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (Tel: 3961 0207, Fax: 2384 4204, Email: elaine@greenpower.org.hk).

Yours sincerely,



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On behalf of

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References:

Green Power. 2021. Ecological Baseline Study of Tung Chung River Catchment. Green Power, HK.
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