BY EMAIL ONLY

Ms. TSE Siu Wa, Janice, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
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5 November 2022

Dear Ms. Tse,

EIA report for Revitalisation of Fo Tan Nullah

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

1. The alignment of the dry weather flow interceptor system (DWFI) is supported in principle whereas the project proponent should also try to combat the polluted discharges along Fo Tan Nullah from the root sources, especially those discharged to Section 1 and 2 (part) where DWFI system is unable to cover. Also, the scenarios of an overflow of DWFI system should be considered to address any impacts on water quality, aesthetics and landscape, ecology, and maintenance in the operational phase.

2. Submersible water pumps will be utilized to pump water from the upstream of the tidal zone to the underground water storage tank so as to replenish the baseflow, which means that saline water may be pumped occasionally during high tides and the salinity of the water flow along the Nullah may be fluctuated. Hence, the riparian wetland plant species selected for the nullah bed greening purpose should be durable in such a harsh environment and be flood resistant. Native wetland species should be chosen as a priority, yet it is doubtful if mangroves are capable to establish well in the resurfaced nullah bed.

3. Nevertheless, the submersible water pumps should be eco-friendly so that no tidal organisms will be killed or trapped. On the other hand, renewable energy supply is preferrable for these pumps to save energy, reduce carbon footprint and promote sustainability. We urge the project proponent to liaise with green groups on the detailed design of the resurfaced nullah, selection of plant species, and design of water pumps.

4. The flow connectivity along Fo Tan Nullah should be maintained and enhanced during both the construction phase and the operational phase. The flow diversion channels applied during the channel bed modification work in the dry season should remain unobstructed. The in-stream fixed weirs along the nullah bed designed for water retention purposes should not compromise the flow connectivity as well. The project proponent should also explain clearly the mechanism of controlling the supplementary baseflow from the water storage tank and to what extent it will sustain the baseflow connectivity in the dry season.

5. The adoption of wildlife-friendly design along the revitalized nullah, such as wetland habitat creation, lighting, and disturbance minimization, is appreciated. However, the details of the ecological enhancement features (e.g. meandering nullah alignment, fixed weirs structure, provision of nest boxes or hunting perch, etc.) and their associated target fauna are missing from the EIA report. Apart from the in-stream fixed weir design, the silt trap-like structures commonly found in existing man-made river channels which likely support a higher diversity of aquatic flora and fauna may also be studied, modified, and considered for this project. The project proponent is highly encouraged to involve green groups in these ecological enhancement designs at the early detailed project design stage.

6. In view of the situation of in-stream plantation in the current completed revitalized channel works, the selection of species and precise planting locations should take into account of hydraulic, tidal effect, water quality (at least salinity), substratum materials, shading effect, etc. in this proposed project.

7. The plant species selected for nullah embankment greening and compensatory tree planting should be attractive and usable by the local wildlife and incorporative with the aims of alleviating the heat island effect. In this view, the tree planting list and planting plan should be reviewed by qualified ecologists.

8. We agree to remove the trees of the species *Leucaena leucocephala* because it is a notorious invasive exotic species even in urban environment. We recommend to remove all *L. leucocephala* within and neighbouring project area to prevent its proliferation to the project site because of its high dispersal of seeds and fast growth rate. Eradication of seedlings of *L. leucocephala* should be carried out during operational phase in the project site.

9. The project proponent should also formulate a wildlife-friendly post-revitalization management plan. Immediate check-ups and follow-up actions may be required after a rainstorm and extreme weather conditions. Also, some ordinary routine green space management measures may not be suitable anymore, such as spraying larvicidal oil for mosquito control and intensive plant trimming that will probably deteriorate the ecological functions of the proposed project. In addition, strict management control should be implemented to deter any ecologically destructive human activity, such as fishing, littering, and wildlife feeding.

10. As oversea findings indicated that a substantial portion of marine refuse is originated from rivers feeding the sea[1], the proposed project is an appropriate opportunity to introduce measures to avoid refuse from falling into local revitalized river channel. Therefore, the physical setting of pedestrian areas along the fencing of channel banks should eliminate the placing or hanging of trash bins and recycling bins adjacent to or hanging on the fences. Seating benches or seats (if provided) should not be located adjacent to fences that can let refuse easily be thrown or blown into the channels in the operational phase. We opine such initiative can set a precedent for other channels to avoid additional flood risk, unnecessary maintenance effort, ecological damages and reduce marine refuse. Also, barriers may be installed at ground level of fences along the channel banks to serve the above-mentioned function. We strongly urge the proponent to work on this measure with relevant departments such as Food and Environmental Hygiene Department.

11. Generation, transportation, and disposal of construction-and-demolish (C&D), desilted materials, and other solid wastes should be under stricter control. The mitigation and monitoring measures (i.e. the trip-ticket system and recording system) to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed projects should be incorporated into the specifications of the works contract. The temporary stockpiling locations in the project site should be well covered and set up away from the water flow as far as possible.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, F: 2314 2661, Email: wflo@greenpower.org.hk).

Yours faithfully,

LO Wing-fung
Senior Education & Conservation Officer
Green Power

Reference:

1 LAURA PARKER (2021). "*Plastic gets to the oceans through over 1,000 rivers*" . National Geographic. Available from: https://www.nationalgeographic.com/environment/article/plastic-gets-to-oceans-through-over-1000-rivers