

Mr. Donald, C.K. Tong, JP Director of Environmental Protection

EIA Ordinance Register Office Environmental Protection Department

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24 January 2017

Dear Mr. Tong,

Highways Department Tuen Mun Western Bypass Project Profile

Green Power would like to draw your kind attention to our concerns about the above-captioned project profile (PP) under EIAO.

- 1. According to Section 3.3.8, the land tunnels will mainly be constructed by drill-and-blast method using explosives. Surprisingly, its risks and potential impacts are completely neglacted in PP. No corresponding mitigation measures are proposed to reduce the impacts of
 - (a) blasting noise on the noise sensitive receivers;
 - (b) blasting vibration and no receivers vulnerable to blasting vibration are identified;
 - (c) blasting vibration on the geotechnical stability the eastern slopes of Castle Peak where huge scale of debris flow occurred that may bury the properties and infrastructure downslope, such as Tsing Shan Tsuen San Shek Wan North and South;
 - (d) blasting on ignition of landfill gas that might lead to underground explosion and hillfire;
 - (e) blasting on underground leakage of landfill gas to the proposed tunnels, as there is no adequate bottom sealing layer in Pillar Point Valley Lanfill.
- 2. According to Section 3.3.3, the construction of bridge foundation may affect the nearby Tuen Mun River Channel and local streams in Tuen Mun and Hung Shui Kiu. The proposed measures in Section 5.1.3 are perfunctory and have not taken into account of the fact that Tuen Mun Typhoon Shelter, where Tuen Mun River drains, is an engulfed water body with minimal water turnover rate and self-purification power. More specific measures to protect the water quality of Tuen Mun River and Tuen Mun Typhoon Shelter must be proposed which should be proven effective in this proposed project.
- 3. Large amount of fill materials will be generated from the drill-and-blast works, slope cutting and other construction processes in the proposed project. In order to prevent flytipping and inenforceable land/pond fillings, the transportation of all construction and/or fill material generated from the proposed project must be strictly monitored and controlled. The tracks of contruction trucks and relevant machineries loaded with fill materials and/or wastes must be

closely monitored by GIS or similar technologies.

- 4. Although a list of ecological sensitive receivers is listed in Section 4.1.4, no assessments are proposed to address the impacts mentioned in 1(a), (c) and (d), in particular for these receivers.
- 5. Tuen Mun is one of the worst air polluted districts in the territory which has long been pointed out by green groups (please refer to the attachment) and recognised by EPD. However, PP has not mentioned the existing air pollution situation in Tuen Mun and also not assessed the impacts of additional air pollutants brought about by the proposed project.
- 6. The captioned PP is not competent to address the obvious life-threatening and environmental impacts. Therefore, Green Power urges DEP to either
 - (a) reject the captioned PP or

Cheng Luke Q

(b) direct the proponent to rewrite the captioned PP.

Thank you very much for your kind attention.

Yours sincerely,

CHENG Luk-ki

Division Head, Scientific Research & Conservation

Encl. A Brief Review of AQHI Data of Hong Kong for 2016