



**BY EMAIL ONLY**

**Director of Environmental Protection**

EIA Ordinance Register Office

Environmental Protection Department

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7 February, 2018

Dear Sir,


**Green Power's Comments on  
Project Profile for Yuen Long Barrage Scheme**

1. Green Power would like to respond to the Project Profile(PP) for Yuen Long Barrage Scheme (the Project) which comprises construction of a barrage at the downstream end of Yuen Long Nullah(YLN) (urban section of Shan Pui River) and revitalizing the section of existing nullah between the proposed barrage and Shap Pat Heung Road. We are gravely concerned about the irreversible and long-term adverse environmental, hydrological and ecological impacts on Shan Pui River, Nam Sang Wai and Mai Po Inner Deep Bay Ramsar Site.
2. River conservation is one of Green Power's major concerned issues. Enclosed is our precedent submission to Drainage Services Department, *GREEN POWER's Response to Agreement No. CE 39/2006 (DS) Rehabilitation of Yuen Long Nullahs – Feasibility Study*, which sets down our viewpoints, comments and responses to this study which are mostly valid to the above-captioned PP.
3. We opine that the location of proposed barrage must be strictly confined to south of Kam Tin River old channel to avoid any environmental and ecological impacts on Nam Sang Wai wetland. In order to protect the ecology, wetland habitat and hydrology of Nam Sang Wai, Nam Sang Wai (bounded by Nam Sang Wai Road and Kam Tin River old channel) should not be involved in any activities and footprint of the Project, including works sites, temporary storage areas, usage of existing access roads in Nam Sang Wai, temporary access roads or barging points/berths.
4. Usage of barges should be limited and avoid the wintering seasons of migratory birds in Mai Po Inner Deep Bay Ramsar Site.
5. Comprehensive ecological impact assessment should be conducted and effective mitigation and monitoring measures should be in place in prior to approval of the Project. Green groups should be closely consulted during design, planning, EIA processes, and also construction and operation phases of the Project.
6. The Project should not increase the risk of flood in Shan Pui River catchment area to secure public's safety and possessions. As such, YLN should not be substantially or totally decked for other landuse purposes such as roads or intruded with large structures such as pillars, which may also induce other environmental problems such as urban heat island effect, air pollution, etc.
7. The permeability of the channels should be increase substantially to resume its connection to groundwater. This will provide favourable settings for the restoration of river ecology, improvement of the self-purification power of river and relieve of urban heat island effect. The Project should not permanently disconnect the water flow from upstream to downstream and river mouth. The natural water flow should be allowed to resume if conditions are suitable.

8. The water quality of YLN should be improved at least to an extent suitable for aesthetic purposes and get rid of odour nuisance. The point-source and non-point-source sewage, and polluted stormwater should not be allowed to discard into YLN.
9. Public should be deterred from littering and refuse dumping into the channels during construction and operation phase.
10. The river ecology should be enhanced through re-establishment of vegetation, improvement of water quality, provision of natural river bed substratum and sufficient water flow. Native aquatic and/or riparian plant species should be planted as far as possible.
11. The Project should improve the microclimate of the Yuen Long Town through provision of breeze corridors to disperse air pollutants, and relieve urban heat island effect through increased vegetation coverage and tree plantation in the channels. Existing trees, especially native ones, along YLN should be preserved as far as possible.
12. Sediment dredging and desilting work should be cautiously considered because of its regular and substantial disturbance to the river/stream beds, especially if well-established benthic communities of flora and fauna are existed in the restored courses. If siltation is a major problem, then measures such as reducing soil erosion in Tai Lam Country Park and trapping the sediment upstream should be considered in prior to sediment dredging and desilting work.
13. In order to lower the sediment loading of YLNs, tree plantation and woodland protection should be promoted and hillfire prevention should be strictly enforced in upstream rural area and Tai Lam Country Park.
14. The Rehabilitation should take into account of high flow during rainstorms and consequent heavy siltation afterwards. Any proposed in-channel facilities should be able to withstand in high-flow water current. The geometry of the rehabilitated channels should be designed to lower the impacts of floods on in-channel facilities and facilitate the dredging of sediment.
15. During operation phase, decorative use of lighting should not be incorporated in the Project in order to save energy and avoid unnecessary emission of greenhouse gases. The lighting of the Project should be carefully designed to avoid light pollution and glare nuisance to the residences and wildlife nearby.
16. Except those proposed in PP, more stringent measures should be taken to avoid flytipping of C&D wastes, refuse and soil debris.
17. The Project should encourage the environmental-friendly uses of river/stream channels by the public. Further environmentally damaging developments such as roads and new residential developments that in turn increase the wastewater disposal and polluted surface runoff of the catchment areas should not be included in the Project and in other proposed works related to Shan Pui River.

Thank you very much for your kind attention.

Yours faithfully,



Dr. Cheng Luk-ki

Division Head, Scientific Research and Conservation

(encl. GREEN POWER's Response to Agreement No. CE 39/2006 (DS) Rehabilitation of Yuen Long Nullahs – Feasibility Study)