BY EMAIL ONLY

Ms. TSE Siu Wa, Janice, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

12 May 2022

Dear Ms. Tse,

Project Profile for Underground Quarrying at Lam Tei, Tuen Mun

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

1. In view that granite bedrock is usually distributed densely with joints and may contain faults, the proposed project will potentially cause groundwater infiltration to the quarry cavern and thus change the groundwater levels. Such alternation in the groundwater hydrology will subsequently change the hydraulics and/or hydrology of the natural streams on the ground level and result in aquatic ecosystem degradation or loss, and reduced water discharge to the nearby reservoirs. Unfortunately, such environmental impacts can be catastrophic but hard to be accurately predicted and mitigated. Therefore, a contingency plan should be formulated to cope with any abnormality in the nearby streams and reservoirs caused by the Project. Moreover, diversion of watercourses should be avoided as far as practicable.

2. According to Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data[1], Tuen Mun ranked the top most polluting district in terms of annual average numbers of HHR hours (hourly AQHI ≥7) and days (daily maximum AQHI ≥7) in most of the past eight years. Given that there are many concurrent development projects interacting with the proposed project, a comprehensive cumulative air pollution impact assessment should be covered in the EIA process.

3. Aboveground project footprint, including stockpiling site and worker station etc., should not go beyond the designated boundary of the aboveground works area (i.e. zero footprints in "Conservation Area" of OZP and aboveground of Tai Lam Country Park).

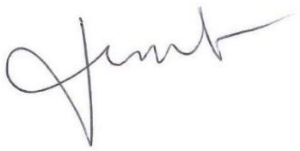
4. Construction and demolition (C&D) materials, chemical wastes, refuse etc. should be properly stored, transported, and finally disposed of at the designated facilities and/or environmentally treated. Unauthorized disposal of solid waste should be strictly prohibited. Deterrent clauses should be incorporated in the work contracts to monitor and penalize any fly-tipping activities.

5. Since the cavern is located in granite bedrock, there is a potential health risk of radioactive radon gas emission. Although a health risk assessment of radon gas emission is not required by the EIA Ordinance, the project proponent should still consider the mitigation measures of such issue as the previous EIA for the Sha Tin Cavern Sewage Development Work did (AEIAR-202/2016). Sufficient ventilation and filtration systems should be installed in the project site to control the radon level not exceeding the latest EPD's Indoor Air Quality Objectives.

6. It is recommended to select native tree species for the compensatory tree planting. Post-planting and post-transplanting monitoring and care should be taken place accordingly.

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,



LO Wing-fung
Senior Education & Conservation Officer
Green Power

Reference:

[1] Green Power (2022). *A Brief Review of AQHI Data of Hong Kong for 2021*. Available from: https://www.greenpower.org.hk/html5/download/concern/20220107_e.pdf