



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)

20 June 2022

Dear Ms. Tse,

Project Profile for Widening of Yuen Long Highway
(Section between Lam Tei Quarry and Tong Yan San Tsuen Interchange)

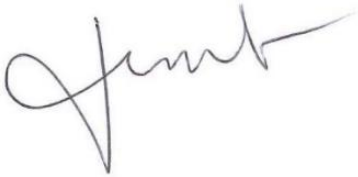
Green Power would like to draw your kind attention to our concerns about the above-captioned Project Profile.

1. According to Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data¹, Yuen Long and Tuen Mun ranked amongst the 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, especially the new road development projects, a comprehensive cumulative air pollution impact assessment should be covered in the EIA process.
2. Highway widening project may induce traffic jam problem during construction phase due to temporary speed limit or closure of lane on the existing highway. For example, the widening of Tai Po Road (Sha Tin Section) has resulted in serious traffic jam in Sha Tin district at peak hours. Therefore, the worst scenario of air pollution impact at the construction phase should take account to the potential change in original traffic flow that may likely introduce additional vehicular emission. A traffic impact assessment may be required to estimate such changes and complement the air quality impact assessment.
3. 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.
4. Stockpiling sites should not be set up nearby any natural habitats, especially the watercourses and riparian zones. Alternations of natural habitats should be minimized as far as possible.

5. Noise barriers/enclosures and screen hoardings should be ecologically-friendly so that bird collision incident will not be anticipated.
6. Sites boundaries of associated activities of the works should be clearly delineated in addition to the “project limit” mentioned in the drawing (Drawing No. HMW20003-SK0129) in Project Profile. The environmental impact assessment should be conducted based on all these sites boundaries.

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