



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaocomment@epd.gov.hk)

7 September 2022

Dear Sir/Madam,

Improvement of Lion Rock Tunnel EIA Report

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

1. The tunnel excavation and road widening works of above-captioned proposed project will potentially threaten Lion Rock Country Park and Beacon Hill SSSI with human disturbance and pollution generated by the construction works (e.g. site formation, stockpiling of materials, surface runoff etc.).
2. In order to avoid eco-vandalism to Lion Rock Country Park and Beacon Hill SSSI, the works areas of the proposed project should be clearly and strictly delineated. Construction activities, stock piling and any disturbance to vegetation and trees should not be taken place beyond the delineated works boundaries. All the contractors, subcontractors and associated service providers of the project proponent should be prohibited from using areas beyond the works areas.
3. If further loss of country park and/or SSSI area for this proposed project is identified after the approval of the EIA report, e.g. for decontamination of soil, Variation of an Environmental Permit should be sought.
4. Highway widening project may induce traffic jam problem during construction phase due to temporary speed limit or closure of lane on the existing highway. 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.

5. As the predicted noise levels are only marginally complied with the criteria at certain noise sensitive receivers in both construction and operation phase, additional mitigation measures should be in place in case of failure of proposed measures in the EIA report.
6. Noise barriers/enclosures and screen hoardings should be ecologically-friendly so that bird collision incident will not be anticipated.
7. Surface runoff and effluent generated from the project site during construction phase should be prevented from discharging into stream channels directly. No sewage or polluted stormwater should be directed to natural streams adjoining the project site in operation phase.
8. The operation party and supervisory/control authority of sewage treatment plant and other sewage treatment facilities of proposed project should be clearly designated under EIAO.
9. All the natural settings of stream courses (i.e. riparian vegetation, especially native, and substratum) should be retained. Alteration of the existing natural watercourses should be avoided as far as possible. Water channels within the project boundary should be restored with ecologically compatible riparian vegetation and substratum and corresponding engineering design should be submitted and approved by relevant authorities and/or experts in prior to commencement of such channel works.
10. Hydrological impacts of the proposed project on the streams in vicinity of the project sites should be regularly monitored, e.g. level of water table, flow volume of existing streams, etc, during construction phase and the early period of operation phase.
11. Transplantation of the flora species of conservation importance should be the last resort if avoidance of encroachment is not feasible. Compensation should not be considered as a proper option which acts contrarily to the concept of conservation if the compensated individuals are from natural sources.
12. The density, species composition, planting schedule of reinstated woodlands for ecological compensation should be planned and designed involving ecologists, botanists and/or arborists. Maintenance period of 3 years by project proponent are suggested with the supervision of ecologists, botanists and/or arborists.
13. Glare impacts from lighting of the proposed project on Country Parks, SSSI and wildlife should be minimized if unavoidable.
14. Approximately 1,338,050 m³ of inert materials and 107,044 m³ of non-inert materials would be generated during the construction phase of the Project. 53,800 m³ of inert material would be reused on site while the remaining 1,284,250 m³ of surplus C&D inert material would be recycled or transported to Public Fill Reception Facilities (PFRFs) for beneficial reuse in other projects.

15. Most inert C&D materials generated from the Project, i.e. 1,284,250 m³ out of 1,338,050 m³, will be transported to PFRFs, Despite claims of trip-ticket system being effective in avoiding illegal dumping and landfilling of C&D materials at unauthorized sites, cheating of the system is possible. Stringent documentation, verification and monitoring for the waste disposal system must be implemented to avoid landfilling in rural areas by waste generated by the Project, especially rural areas in the New Territories.
16. In order to effectively prevent fly-tipping of such solid wastes generated from this project, generation, transportation and disposal of such solid wastes should be under stricter control. The mitigated measures to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed project should be considered to be incorporated into the specifications of the works contract.
17. Effective and deterring measures to confine the travelling routes of dump trucks related to the Project should be utilized, e.g. real-time GPS devices on the trucks, instantaneous alarm alert for the trucks deviated from the designated routes, should be seriously considered. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the irregular activities of relevant contractors.
18. The proposed project further isolates the Country Park with the widened Lion Rock Road during both construction and operation phase. Convenient and clear public entrance to Lion Rock Country Park to access to Hung Mui Kuk Nature Trail through Hung Mui Kuk Road should be provided during both construction and operation phase.
19. The footpaths and picnic areas in Country Park should be well shielded from air pollution and noise nuisance generated from the project during both construction and operation phase.

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: lkcheng@greenpower.org.hk).

Yours faithfully,



CHENG Luk-ki
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