BY EMAIL ONLY

Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

29 September 2022

Dear Sir/Madam,

Project Profile of Relocation of Yau Tong Group Fresh Water and Salt Water Service Reservoirs to Caverns

Green Power, a local charitable green group, would like to draw your kind attention to our comments about the above-captioned Project Profile (PP).

1. Although Green Power support cavern usage in principle, we stress that the Administration needs to consider the environmental impacts, safety, radon and underground water hydrology issue in prior to finalizing the usage and construction methods of individual sites.

2. In order to fulfil the ventilation requirement in EIA stage, the Project proponent will review the need for ventilation shaft(s) in EIA study. As no corresponding details are presented in the PP, the environmental and ecological impact assessments of such ventilation shaft(s) should be included in the EIA Report to determine the optimal locations, construction methods and operation modes in the context of environmental and ecological considerations.

3. Direct loss of habitats (mainly at plantation and shrubland, grassland mosaic) due to the proposed project (e.g. the construction of an emergency man access tunnel, vehicular access tunnel and ventilation shaft(s)), and indirect impacts to the surrounding habitats and associated wildlife due to disturbance from construction works (e.g. construction dust, noise, silty run-off) identified during feasibility study stage should be avoided, especially for protected, endangered or rare species. Adequate mitigation and compensation measures should be proposed, implemented and monitored to conserve these species and habitats if identified.

4. The existing trees/vegetation within the works areas of the aboveground structures may need to be removed. The parts of the aboveground works areas that will be reinstated after completion of works should be compatible to the adjoining natural habitats. In this regards, native species should be selected for restoration and/or compensation with proper measures to stabilize the restored slopes and deter trespassing.

5. Tree felling and transplantation should be avoided as far as possible. Preserved trees in the construction or demolishment sites should be well protected during construction phase by proper fencing against interference and damages, such as tramping by human or machines, wastewater or chemical discard or unnecessary trimming and root excavation. Post-planting and/or post-transplanting monitoring and care should be taken place accordingly.

6. Although the proposed tunnel and cavern will be installed with water-proof lining to prevent infiltration of groundwater infiltration into the tunnel and cavern, occurrence of drawdown of stream courses locating above works area/groundwater table should be monitored during both construction and operation phase. Moreover, diversion of watercourses should be avoided as far as practicable.

7. Project proponent should be responsible for maintaining a safe working environment for the workers and occupants during the construction phase. Particularly, proper occupational measures to reduce toxic air pollutants and air-borne dust, as well as to prevent fire hazard in the cavern should be adopted. An emergency evacuation procedure should be well planned in case of any sudden occurrence.

8. Since the project site 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.

9. A comprehensive Construction and Demolition Material Management Plan (C&DMMP) should be drawn up and included in the EIA Report. The report should predict the volume of inert and non-inert materials generated from the project and propose measures to minimize the generation of C&D materials, and enhance the on-site and off-site reuse of excavated material, in particular the rock spoil from cavern construction.

10. 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.

11. 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 by waste generated by the Project.

12. Effective and deterring measures to confine the travelling routes of dump trucks and similar machineries related to the Project are recommended, e.g. real-time GPS devices on the trucks, instantaneous alarm alert for the trucks deviated from the designated routes. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the irregular activities of relevant contractors.

13. Last but not the least, risk assessment and measures to avoid the contamination of the potable water in the future cavern should be conducted to safeguard the quality and safety of drinking water.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, Email: lkcheng@greenpower.org.hk).

Yours faithfully,

CHENG Luk-ki
Director, Green Power