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26th April 2021

Ms. Cheng Mei Sze, Maisie, JP
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By E-mail: eiaocomment@epd.gov.hk

Dear Ms. Cheng,

RE: Comments on Yuen Long Barrage Scheme EIA Report

The Conservancy Association (CA) would like to express our concern on the captioned.

1. Direct impact on flight path on ardeids and waterbirds

Section 7.6.16 has mentioned the potential impact on flight path on ardeids and waterbirds:

> "*On the other hand, the height of the proposed barrage varies from 6 – 19 mPD (tidal barrier: 0-6 mPD; link bridge: 7.2 mPD; pumping station: 19 mPD; E&M building 13.6 mPD), and a portion of waterbird's flight-lines (347 observations from 36 survey sessions (30min per session) during a 12-month period, approximately less than 10 birds per survey) flied along the YLN Section 4 across the proposed barrage location with the height below 10m, among other waterbird flight-lines above 10m and even higher than 20m reported from the same surveys. This indicated that the flight behaviour of some water birds currently flying along the YLN will be affected.*"

According to Table 12 of Appendix 7.1, we note that 85% of the flight lines (347 out of 410) passing through the barrage is less than 10m. The result is that the entire barrage would block most of the flight lines. Under such circumstance, we do not think significance of such ecological impact is minor and no mitigation measures are

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required. More efforts on minimizing or mitigating such direct impacts would be necessary.

2. Loss of intertidal habitat in the channelized watercourse

The channelized watercourse between existing inflatable fabric dam and proposed tide barrier is currently covered by sediment and vegetation and foraged by waterbirds. The intertidal habitat would be irreversibly loss due to the proposed tidal barrier and pumping station. This direct loss of 0.26 ha habitat has to be compensated and complied with the "no-net-loss in wetland" principle.

Section 7.6.47 mentioned how the direct loss of intertidal habitat during operation phase can be compensated:

> "*For the footprint of tidal barrier and pumping station (0.26ha of watercourse) that will be lost permanently, the direct encroachment of the habitat as well as the feeding/roosting ground for waterbirds will be very limited. As discussed in the construction phase, the existing inflatable dam with an area of approximately 255m^2 will be decommissioned, so that some area (i.e. 255m^2) of waterbody will be re-provided. Besides, the operation of the tidal barrier will allow water from the Deep Bay flushing in beyond the existing inflatable dam. It is estimated that about 50m stretch of YLN upstream of the inflatable dam can provide additional ~0.26ha of wetland habitat during operational phase, and hence achieve no net loss of wetland.*"

The loss intertidal habitat can be recreated beyond the tidal barrier or even 50m beyond the location of the existing inflatable dam is subject to various factors such as water volume, water salinity, tidal range, availability of sediments, and so on. We are still very concerned about how the proposed compensated intertidal habitat can be guaranteed to achieve "no-net-loss in wetland" principle.

3. Indirect impact on the Old Kam Tin River

Regarding indirect impact on the Old Kam Tin River, Section 7.12.5 ensured that "*Hydrodynamics at the Old Kam Tin River as well as Shan Pui River will not be changed significantly due to the large waterbody of Deep Bay. While the scouring*

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effects to the exposed mudflat during low tide can be minimized by good discharging design". Nevertheless, we are still very concerned about the changing pattern of water discharge would have any implications on the sedimentation pattern outside the barrage, particularly Old Kam Tin River.

4. Ecological trench

Section 2.9.19 once mentioned that "*The details of a 300mm x 300mm ecological trench will be further explored in the detailed design stage to allow free passage of water and aquatic organisms, even when the tidal barriers are closed*". However, the size "300mm x 300mm" has been frequently specified in different sections of the EIA report. While we understand the intention of ecological trench to maintain ecological connectivity, whether the exact size can be further adjusted in detailed design stage to optimize its function would be important. We hope that such flexibility could be included in the design of ecological trench.

5. Operation of low flow pump

Appendix 2.4 has illustrated that low flow pump will be operated when water level in YLN is higher than the triggering level (+0.5 mPD). What we concern the most is the duration of pumping water out of the channel. The construction of tidal barrier has already prevented excessive tidal water from entering the channel. When the low flow pump is operating to pump out the remaining tidal water from the channel, it would keep very limited water in the channel or, worse still, dry up the channel. Such change would cause great impacts on the ecological condition within the channel. Moreover, frequent turning on the pump would also cause indirect disturbance on aquatic species.

We understand from Section 7.6.47 that "*The feasibility of flexible trigger levels and an adaptive management approach to extend the durations in partial opening of tidal barriers and operation of the low flow pumps could also be further explored*". While for the time being we do not understand well if the triggering level +0.5mPD is already striking the best balance among flood control, odour issue and ecological connectivity, there should be flexibility to review the triggering level in face of different hydrological, ecological, or even climate condition.

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6. Revitalization work

We understand from the EIA report that landscaping work would be provided as part of the revitalization work along Yuen Long Nullah. While detailed design of various landscaping features would be provided in the next stage, we would point out some concerns commonly raised out in the past:

- Excessive landscaping plants are over-growing along the channel
- Invasive species are spreading along the channel
- Refuse is trapped by landscaping plants in the channel
- Limited water body can be spotted
- All landscaping and revitalization work are confined to channel bank only

We hope that the above concerns would be properly handled.

Besides, continuous dialogue between Drainage Services Department and various stakeholders on the part of revitalization work is still very important in future.

Yours faithfully,
Ng Hei Man
Campaign Manager
The Conservancy Association