



長春社 Since 1968

The Conservancy Association

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8<sup>th</sup> May 2020

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,

Comments on Tung Chung Line Extension Project Profile

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

**1. Mudflat and woodland in Ma Wan Chung**

If comparing the Tung Chung New Town Extension EIA report (TCNTE EIA) with the Project Profile, the proposed alignment would pass through mudflat in Ma Wan Chung area. Besides, the Emergency Access Point (EAP)/ Emergency Egress Point (EEP) is now proposed to be located at mature and young secondary woodland in Ma Wan Chung (Figure 1). Since the past assessment has once confirmed that mudflat and mature secondary woodland ranked HIGH and MODERATE TO HIGH in overall ecological value respectively, we are doubtful that if the current alignment and the EAP/EEP are the most appropriate option in avoiding ecological loss.

From Section 3.1.3, we are also concerned about those worksites, site office, storage facilities, even in temporary during construction period, would also encroach areas of high ecological value, particularly mudflat and mature woodland.

For mudflat, species such as Horseshoe Crab *Tachypleus tridentatus* and Green Mudskipper *Scartelaos histophorus*, have once been spotted according to the TCNTE EIA<sup>1</sup>. TCNTE EIA also mentioned that according to the Shannon diversity in Tung Chung Bay and Tai Ho Wan, Ma Wan Chung ranked second highest Shannon diversity among the 4 sampling locations in both dry and wet season.

<sup>1</sup> See Section 9.4.4.34 and 9.4.4.35 of the TCNTE EIA



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For woodland, Section 9.4.8.3 of the TCNTE EIA had the following description:

*“Mature woodland, on the other hand, was about 30 years or older (shown in aerial photos dated 1982 and after) has taller canopy height (8-12m), well developed layers (canopy, mid and understorey) with more late successional species of larger size (e.g. along Shek Mun Kap Road, at Sheung Ling Pei, **and at Ma Wan Chung headland (or Wong Nai Uk)**. Tree species including *Pinus massoniana*, *Schefflera heptaphylla*, *Mallotus paniculatus*, *Rhus succedanea*, *Sterculia lanceolata*, *Daphniphyllum calycinum* and *Sapium sebiferum* were found in the open canopy.”*

We opine that the project proponent should further explore ways to **avoid/minimize the adverse ecological impacts on the above habitats (and all other ecologically sensitive areas) in both construction and operation phase.**

## 2. Ventilation facilities

We assume the location of ventilation facilities would result in potential visual impact to the local community in the operation phase of the project, but we cannot see that this has been included in Section 3.10.2. We suggest that the **“new aboveground structures”** mentioned in Section 3.10.2 **should also include ventilation facilities. Mitigation measures, such as reduction in scale of ventilation shaft, integration with adjacent environment, greening, should be proposed in the EIA report.**

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

**Figure 1** By overlaying the proposed alignment on the habitat map of TCNWE EIA, the Emergency Access Point (EAP)/ Emergency Egress Point (EEP) (red point) is located at both the mature and young secondary woodland in Ma Wan Chung

