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The Conservancy Association

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16th September 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 Drainage Improvement Works in Mui Wo Project Profile

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

1. Maintenance access

Section 2.5.11 of the Drainage Improvement in Southern Lantau Investigation EIA report has the following evaluation:

“To minimize the impact to the areas, no maintenance access will be provided for the proposed rivers in Mui Wo. Only an access points to the channel bed will be provided at the downstream end of the Pak Ngan Heung River for desilting purpose. Maintenance vehicles can access Tai Tei Tong River, Luk Tei Tong By-pass Channel and Luk Tei Tong River via the access point”.

Section 7.8.9 has the similar suggestion:

“A standard design feature of most engineered drainage channels in Hong Kong is the inclusion of a footpath or access road along one or both banks of the channel. To minimise impacts to Luk Tei Tong Marsh, no footpath would be constructed along the by-pass channel”

Base on the past recommendation, we are doubtful if the proposed maintenance access in Tai Tei Tong River and Luk Tei Tong Bypass Channel is the best option to avoid or minimize potential environmental impact. We opine that alternatives should be considered (e.g. whether there is real need of the proposed access, location, scale, and



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so on) to avoid or minimize any potential environmental impacts.

2. Luk Tei Tong Bypass

We note that many engineering design elements are proposed in Luk Tei Tong Bypass and turn this engineered drainage channel more artificial. Besides, new wetland area¹ was once proposed within the Bypass channel bed as compensation according to the Drainage Improvement in Southern Lantau Investigation EIA Report. While we do not rule out any ways for improving the ecological condition of the Bypass, it is doubtful if efforts of this compensation measure would be offset by such a lot of engineering design elements. Whether there is real need of those elements should be further assessed to avoid or minimize any potential environmental impacts.

3. Fish ladder

Even though we assume that the intention of introducing fish ladder is to provide suitable habitat for fish species, initially we do not understand such proposal is necessary in this flood control project. Justifications for putting fish ladder in the proposed two locations are also unclear. We hope that the above should be further clarified in the EIA report.

4. Romer's Tree Frog

The endemic Romer's Tree Frog is protected under Cap. 170, ranked as "endangered" in IUCN Red List and considered of "potential global concern"², with its distribution in various areas including Lantau Island. It should be considered as species of conservation importance in this EIA report. Habitats associated with the behavior of Romer's Tree Frog should be identified in the assessment. Both direct and indirect loss of habitats should be evaluated and greatly avoided.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

¹ See Section 7.8.22 of Drainage Improvement in Southern Lantau Investigation EIA Report Section

² Fellowes, J.R., Lau, M.W.N., Dudgeon, D., Reels, G.T., Ades, G.W.J., Carey, G.J., Chan, B.P.L., Kendrick, R.C., Lee, K.S., Leven, M.R., Wilson, K.D.P. and Yu, Y.T. (2002). Wild animals to watch: terrestrial and freshwater fauna of conservation concern in Hong Kong. *Memoirs of the Hong Kong Natural History Society* 25, 123-159.