



長春社 Since 1968

The Conservancy Association

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29th June 2021

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

RE: Comments on the Section 16 Application No. A/YL-MP/309

The Conservancy Association (CA) considers that Mai Po Ramsar Site is not only within Wetland Conservation Area (WCA) under Town Planning Board Guideline No. 12C, but also an internationally recognized wetland. Therefore, any works within the area should be strictly evaluated. However, we are in reservation of the proposed work in this stage, as we note that various inadequacies in the Ecological Impact Assessment (EcoIA) have not been clearly clarified and addressed. Further information should be included in this application.

1. Inadequacies in habitat map

Habitat types in Figure 2 and 3 of the EcoIA are inconsistent and we feel hard to follow. For example, brackish marsh and waterways are combined in one single habitat in Figure 2, but they are separated in Figure 3. Another inconsistency would be “waterways” and “natural watercourse” used in Figure 2 and 3 respectively. Species of conservation importance in Figure 2 and 3 are also different. Such presentation would greatly affect identification and evaluation of ecological impact brought by the proposed work.

For Figure 3, we have to highlight that the habitat map merely covers 500m zone of Peter Scott Field Studies Centre (PSFSC) and it would definitely excluded part of the fire hydrant pipeline. Its proposed alignment is also missing in the habitat map.



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of actually did not cover the entire study area of fire hydrant pipeline.

We suggest that a comprehensive habitat map should be prepared in the EcoIA.

2. Inadequate assessment on potential environmental impacts

It seems that the EcoIA is just extracting all results from the past EEA but there were no additional survey or verification of the past assessment results. From the part “Sequence of Works” (Section A.1.10) in EEA, however, we cannot find any installation works of public fire hydrant. Most of the evaluation in this EcoIA, therefore, would be irrelevant to a certain extent. Even the EcoIA has come across potential impacts brought by the excavation work of fire hydrant pipeline, they are not quite detailed. Besides, despite provision of mitigation measures (as stated in the Planning Statement), it is still hard to evaluate how effective those mitigation measures would be without a proper environmental assessment.

We worry that all potential environmental impacts caused by the work during construction and operation phase, such as water quality, noise and ecology, indeed have not been fully addressed in this stage.

While we suggest that the project proponent should identify clearly potential environmental impacts during construction and operation phase, here we also wish the project proponent to clarify some of the issues:

- i. As Deep Bay is an ecological sensitive area, a “Zero Discharge Policy” for Deep Bay has been implemented in Deep Bay catchment. Please specify how the proposed work fulfills “Zero Discharge Policy” for Deep Bay during construction and operation phase.
- ii. Figure 2 of the EcoIA stated that “*The 50 and 100 m contours are shown to identify the extents of anthropogenic disturbance zones for presence and human activity and for noise attenuation from heavy machinery, respectively*”. However, we can merely spot a 25m and 100m buffer. It is necessary to clarify such inconsistency.
- iii. Figure 2 of the EcoIA also mentioned that “*The environmental monitoring area from the fire hydrant pipeline construction demarcated by the red polygon shows the fishponds and the complex of marsh/natural watercourse habitats*”.



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that could become impacted by spillage of soil and other construction-related pollutants. These are adjacent ponds that are individually and physically bounded and separated by bunds, preventing the spread to adjacent ponds, and the marsh/stream complex". We still do not understand why environmental monitoring area has to be designated in such irregular form.

- iv. Section 2.3.9 mentioned that *"It is unlikely that any additional rainwater draining into the stream from the PSFSC will have a significant negative impact on the ecosystem..."*. We do not think such evaluation is related to the fire hydrant pipeline work itself.
- v. Section 3.2.2 of the EcoIA admitted that *"The commercial fishponds and wooded area immediately adjacent to the construction and excavation alignment will encounter some noise levels during the day when construction activity happens"*. As these areas can be utilized by wildlife, it is important to clearly specify the exact unmitigated noise level, and then suggest proper measures to minimize or mitigate noise. Simply claiming that *"these areas are already impacted by noise from anthropogenic activity"* is not well-justified.
- vi. Would any potential disturbance be resulted on the night roost at the tree group next to the PSFSC forecourt during the pipeline installation? Would it be necessary to restrict working hours to avoid potential disturbance?
- vii. For trees close to the alignment of the pipe, would they be felled? If yes, are there any compensatory planting plans? If not, are there any tree protection zones to separate the work site and those trees?
- viii. It seems that the proposed mitigation measures in Summary (Section 5 of the EcoIA) are not totally consistent with other sections. Some of the proposed mitigation measures are missing in Summary. Please critically evaluate which mitigation measures would be put into practice.
- ix. Section 5 of the EcoIA mentioned that *"To minimize the impact to the ecology and the environment of Mai Po, the construction of the fire hydrant pipeline will follow stringent protocols and mitigations. All construction will be preferably completed within 8 weeks in the summer season of 2021, non migratory season"*. However, according to Figure 2, it seems that the alignment of the pipeline is very close to or even under Mai Po egret. In this case, any works in summer season might overlap breeding season of ardeids. It is necessary for the project proponent to clarify if any potential impacts would be caused on Mai Po egret,



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and evaluate whether any mitigations measures should be proposed.

3. Concern on cumulative impact

The previous upgrading work of public fire hydrant in Tam Kon Chau Road and PSFSC and the current underground stormwater drainage pipe are indeed part of the demolition and re-construction of PSFSC, but both works are not mentioned in the EEA. We still worry that if there are any other utilities associated with the demolition and re-construction of PSFSC.

Meanwhile, Section 4.4.1 of EcoIA mentions that “*Surveys indicate that even with the noise and activity from construction in the Field Studies Centre many birds—from waterbirds such as Grey herons, egrets, cormorants, and grebes to passerines—are still active with no indication of being disturbed and no mitigation measures are necessary*”. As no frequent updates of the monthly Precautionary Ecological Checks or Environmental Impact Monitoring Report can be seen on the Mai Po Community website, it is necessary to provide those surveys to evaluate potential cumulative impact caused by the associated work in PSFSC.

Simply speaking, we would suggest that cumulative impacts due to other planned and committed works, including all associated utilities, and the demolition and re-construction of PSFSC, should be evaluated.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association