



長春社 Since 1968

The Conservancy Association

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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 Road P1 (Tai Ho – Sunny Bay Section) in Lantau Project Profile

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

1. Impact on Chinese White Dolphin (CWD)

CA highly worry the proposed reclamation area is very close to The Brothers Marine Park, and this would cause more disturbance to CWD. Here we hope to highlight the following findings extracted from the final report of The Monitoring of Marine Mammals in Hong Kong Waters (2019-20):

“However, the passive acoustic monitoring (PAM) conducted concurrently by HKCRP with the funding support of AFCD revealed that dolphins have not abandoned this area completely (especially around the Brothers Islands where the C-POD units were deployed) in recent years. For example, there were a total of 36 days in the past three years (including 12 days in the second half of 2017, 17 days in 2018, and 7 days in 2019) where at least 10 DPMs (a Detection Positive Minute is any one minute period where at least one click train was detected) were recorded per day at Siu Ho Wan” (Section 5.1.2)

“Notably, in the past two PAM monitoring periods in 2017-18 and 2018-19, a strong diel pattern with significantly more dolphin detections at night than during the day was found among all sites within the Brothers Marine Park” (Section 5.1.2)

“Even though the dolphin detections were still very low around the Brothers



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Islands in NEL, the continuing night-time usage by dolphins of this once-important habitat should not be overlooked...”(Section 5.1.2)

“...the AFCD passive acoustic monitoring study revealed a very low level of dolphin occurrence within this marine park in 2017-19, where the acoustic detections were mostly made during the night-time. It remains to be seen whether there will be any signs of recovery in dolphin usage in the foreseeable future”
(Section 5.3.1)

The above findings reveal that CWD can still be detected during night-time in The Brothers Island. Even Section 3.4.2 of the Project Profile has also mentioned that “*the passive acoustic monitoring had recorded some usage in the area of SHW by CWD at night time*”. Thus we do not understand why evaluation like “*though there is only low and probably occasional occurrence of CWD recorded in Siu Ho Wan in the past*” (Section 3.5.1) would be stated in identification of construction and operation impact in the Project Profile.

Besides, the proposed reclamation area would be confined to coastal areas near Siu Ho Wan and Sham Shui Kok very near to The Brothers Island. Based on the above findings, we do not think that the current alignment and reclamation work attempt in avoiding and minimizing adverse impact on CWD and marine environment.

We opine that the following should be included in the assessment:

- i. Impacts on CWD and their prey resources during construction and operation phases should be evaluated
- ii. The scale of reclamation work, the alignment and construction methods should be critically reviewed to avoid and minimize impacts on CWD

2. Impact on Yan O Wan

With high concentration of development, natural landscape and resources with limited or no human intervention become scarce in North Lantau. Yan O Wan and its surrounding are nearly the remaining natural features in North Lantau that keep undisturbed. From the Project Profile, however, the tunnel and elevated road/at-grade



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road would be connected right at Yan O Wan. The Project Profile also mentions that the work here would also include “the associated tunnel portals, administration building and ventilation facilities” (Section 1.4.2). While details of work, such as how the tunnel and elevated/at-grade road would be connected, the location and scale of facilities associated with the proposed tunnel, and so on, are not mentioned in the Project Profile, we worry that Yan O Wan would be highly disturbed in future in both construction and operation phase.

We opine that the following should be included in the assessment:

- i. Both direct and indirect habitat loss, as well as fragmentation of habitat due to the project should be evaluated
- ii. All works adjacent to Yan O Wan, such as location and scale of the facilities associated with the proposed tunnel; specific works involved in connecting the tunnel and elevated/at-grade road, etc., should be critically reviewed to avoid and minimize potential environmental impact

Thank you for your attention.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association