

Ms. CHENG Mei Sze, Maisie
Director of Environmental Protection
(E-mail: eiaocomment@epd.gov.hk)

By email only

6 October 2021

Dear Ms. Cheng,

**Comments on the Environmental Impact Assessment Report for Revised Trunk
Road T4 in Sha Tin (EIA-273/2021)**

The Hong Kong Bird Watching Society (HKBWS) would like to express our concerns regarding the environmental impact assessment (EIA) report for the Trunk Road T4 in Sha Tin.

Significantly underestimate the population of ardeids at the night roost

According to Section 8 of the EIA report, the peak count of night-roosting ardeids of night roost along Shing Mun River Channel was only 38, which was recorded in September and November 2020 respectively. The applicant also regarded that “*the night roost site supported low to moderate abundance of ardeids*”. However, from our observation in January 2021, about 300 ardeid individuals were found using the sides of Shing Mun River Channel as a night roost. It is more than seven times the number of roosting ardeids provided by the applicant. We are concerned the ecological value and importance of this night roost would be underestimated, and we also consider that the site is supporting significant abundance of roosting ardeids. Any adverse impacts, especially their flight lines, should be properly avoided and minimized.

Adverse impacts on flight paths of night-roosting ardeids

Regarding the height profile of the proposed dual 2-lane flyover, it is stated in Section 8.8.1.14 that “*it would be suppressed from 15 mPD near HKHM to 5 mPD near Riverpark (refer to Figure 2.3.3). Semi-enclosure of approximately 6 m height would*

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be proposed at the southern part of proposed dual 2-lane flyover near the Riverpark.”

In the sections related to disturbance impact on night-roosting ardeids, the applicant did not mentioned any about the potential blockage of flight paths on them due to the proposed dual 2-lane flyover (i.e. 1 5mPD) and its noise barrier (i.e. 6 mPD). Instead, the applicant summarize the data of flight paths of both the roosting and non-roosting ardeids in sections related to impact on ardeid flight path, and explained that *“about 23% of total recorded ardeids were recorded flying over the Lion Bridge with height less than 15 mPD”*. We are concerned this kind of presentation could not adequately reflect the flight height and flight paths of night-roosting ardeids particularly and would eventually underestimate the impacts on them. When referring to Appendix 8.6 Result of Flight Line and Height Surveys of the EIA report, it is very clear that over 80% of the night-roosting ardeids would leave the roost and fly eastward over the proposed dual 2-lane flyover. While among the recorded flight lines of night-roosting ardeids in eastward direction, over 80% of them were at a height of 5-15mPD. We consider the potential adverse impacts on their flight paths are significant and are greatly underestimated given that the peak count of the number of night-roosting ardeids provided in this EIA report is far less than what we observed in the past years.

According to the EM&A Manual, there would be monthly ardeid monitoring *“to monitor the extent and status of ardeid night roost, and the effectiveness of proposed mitigation measures”* during construction phase, and *“a pre-construction ardeid survey should be conducted to ascertain the status and extent of the ardeid night roost no earlier than 3 months before the commencement of construction works”*. We consider that monitoring surveys for the night roost should be conducted at least once a month by the consultant not only before, during the construction phase, but also after the construction phase (i.e. operation phase), to monitor any change in location of the roost within the study area of this EIA.

Bird collision

Apart from the above mentioned impacts on flight paths, we are also concerned the design of the noise barrier with semi-enclosure near HKHM and Mei Lam Estate, and also the noise barrier in other sections would increase the risk of bird collision, as the applicant stated in Chapter 9 of the EIA report that *“the combination of tinted or transparent panels at top and solid panels in green tone at the bottom could allow the daylight to pass through and lighten the visual impact avoiding blockage of view and potential enclosure effects, and also helps to reduce the monotonous looking and merge with its surroundings”*. Despite that the applicant mentioned in Chapter 8 that the use of tinted materials and superimposing dark patterns or strips on noise barrier would be adopted. Given that there would still be transparent panels, we consider a precautionary approach should be taken to avoid any potential bird collision. All noise barriers and noise enclosures with transparent panels should be fitted with visible markers to avoid bird collision. The Highways Department already revised their practice notes for noise barriers in 2018 and included design requirements in section 27.13 of Annex I (Revision C)¹ to minimize bird collision. The above potential adverse impacts of the proposed project on birds and the corresponding mitigation measures should be included in the upcoming EIA.

We would also like to reiterate that avoidance of any impacts should always be the first priority, while mitigation measures to reduce the adverse impacts of the development would only be considered as a last resort. The HKBWS hopes that our comments would be taken into consideration. Thank you for your kind attention.

Yours sincerely,



Wong Suet Mei
Conservation Officer
The Hong Kong Bird Watching Society

¹ Highways Department. (2018). *Practice Notes No. BSTR/PN/003 - Revision D: Noise Barriers with Transparent Panels*. Bridges and Structures Division of Highways Department. Retrieved from https://www.hyd.gov.hk/en/publications_and_publicity/publications/technical_document/division_practice_notes/index.html