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The Conservancy Association

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### Comments on Liantang/Heung Yuen Wai Boundary Control Point and Associated Works

The Conservancy Association (CA) would like to submit our comments on EIA report regarding Liantang/Heung Yuen Wai Boundary Control Point and Associated Works:

#### 1. Tree survey

While the EIA report stated that the detailed tree survey report would be submitted in separate, such data would be important to evaluate justification of proposed tree treatment, especially tree felling in this project. From ETWB TCW No. 3/2006 - Tree Preservation, the following order of priority should be adopted for tree removal consideration: retain, transplant on-site, transplant off-site, and fell. Suggestion of felling 6,600 trees based on the currently very brief summary only would be disastrous to existing habitats, especially hillside woodland. We strongly urge that the detailed tree survey report should be attached in EIA report for public access to clearly evaluate if the hierarchy for tree removal have been strongly adhered to.

#### 2. Woodland loss

We have particular concern on Section A, Zone 3 where the construction and operation of northern tunnel portal, Sha Tau Kok interchange and southern tunnel portal near Loi Lung Village and Princess Hill is going to take place. This area, apart from *Aquilaria sinensis*, also consists of species such as *Acronychia pedunculata*, *Schefflera heptaphylla*, *Endospermum chinense* (Table 11.13). It shows that this piece of woodland is a good quality secondary forest or even Feng-shui wood. Even Table 9.45 of the EcoIA has assessed that the ecological value of this area is high-moderate and high. When 1900 out of 3620 trees from this area are proposed to be removed, the woodland habitat will be permanently destroyed. The alignment should avoid touching this area.

#### 3. Woodland Compensation Plan

We regard the “Woodland Compensation Plan” (Appendix 9.4) as a secondary and inferior option to “Avoidance”. We are of the view that the loss of 6.2ha of mature woodland is unacceptable and should be further minimized. Nonetheless, we have the following specific comments on the woodland compensation plan.

##### 3.1 Fire control

We are surprised to see that there is no “fire prevention and fighting” plan for the woodland compensation area. The study areas frequently suffer from hill fires and the lack of fire prevention and control in the woodland compensation plan is unacceptable. A single hill fire can destroy many years of reforestation effort.

##### 3.2 Weed control

The study area is full on invasive weeds now and any newly reforested areas will be seriously affected by plant invasion. Again, Appendix 9.4 does not contain a prevention and control plan for invasive plant species, which is not acceptable.

### 3.3 Seedling source

Lastly, the recommended plant species for the compensation woodland, especially the Fung Shui wood species include species that are not or rarely used in commercial planting in Hong Kong. The source of seedlings of the specified species may limit the eventual planting mix, which may defeat the purpose of the compensation planting. The proposed species lists have to be reviewed with respect to seedling availabilities. A better way to do this is to plan ahead and engage a nursery to produce those seedling species 2 years before the actual planting work. Given the size of the compensation woodland (18.6 ha), an on-site temporary tree nursery may be provisioned to produce seedlings required for this planting work. The obvious advantage is that seeds from the study area could be collected and propagated in the nursery.

### 3.4 Establishment period

A major deficiency of the “Woodland Compensation Plan” is the short maintenance and establishment period. It is stated in Appendix 9.4 that “AFCD will maintain the ecological planting as recommended by EIA till the vegetation is fully established, which normally takes 9 years”. It should be noted that ecological restoration of native forest is extremely difficult (arguably, there isn’t yet a successful case of such work in Hong Kong), nine years are considered not enough. The audit of this compensation woodland should be based on the eventual area of closed-canopy forest formed rather than the area planted. Maintenance funding should be provided until a closed canopy forest is formed.

## 4. Agricultural land use

In Chapter 11 of the EIA report, the proposal attempted to mitigate the loss of active farmland through, for example, detailed design considerations, top soil re-use, tree protection and preservation, tree transplantation and compensatory planting. However, nearly all suggested measures were non-related to agricultural practice and definitely gave no changes to irreversible loss. The conclusion that residual impact during construction and operation would be slight or even insignificant might sound untrue.