Mr. TONG Chi Keung, Donald, JP Director of Environmental Protection (E-mail: eiaocomment@epd.gov.hk)

<u>By email only</u>

4 April 2019



香港觀鳥會 THE HONG KONG BIRD WATCHING SOCIETY Since 1957成立



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Dear Mr. Tong,

Comments on the Project Profile for Revised Trunk Road T4 in Sha Tin (ESB-315/2019)

The Hong Kong Bird Watching Society (HKBWS) considers that it is important that <u>all</u> <u>potential ecological impacts of the proposed road works</u> are properly identified in the Project Profile (PP) so as to ensure the proposed development will not cause any adverse ecological impacts on birds.

1. Concerns on the ardeids night roost

From our observation, ardeids has been using the banks of Shing Mun River Channel (the section between Tsuen Nam Road and Lion Rock Tunnel Road) as a night roost for at least 10 years. They also use banks and river for perching, foraging and roosting. This night roost is identified as one of the ecological sensitive receivers in the PP¹. However, we consider that the project proponent underestimated the extent of the night roost (Figure 1). The project proponent should re-confirm the extent of the existing and potential ardeid roosting site, and if there are any changes/patterns in the use of the roosting site during a year. Careful phasing of the construction works within a day (e.g. avoid overlapping of the construction hours with the ardeid's use of the night roost starting before sunset each day) and maintaining good site practices (e.g. no lights directed towards the ardeid roosting site) should be considered to avoid/minimize the adverse ecological impacts on the ardeid night roost.

2. Bird collision

Section 3.7.2 of the PP stated "Noise barriers and noise enclosure on viaducts and depressed roads may affect the flight path of avifauna and increase the chance of bird collision." We agree with the above statement as there are patches of well-vegetated areas surrounding the project site and we consider the risk of bird collision should be minimized. Taking a precautionary approach, 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

¹ Section 4.5.1 of the PP

included design requirements in section 27.13 of Annex I (Revision C)² 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.

The HKBWS hopes that our comments would be taken into consideration. Thank you for your kind attention.

Yours sincerely,

Woo Ming Chuan Senior Conservation Officer The Hong Kong Bird Watching Society

Figure 1. From our observation, the extent of the ardeid night roost can stretch from Man Lai Court to the Hong Kong Heritage Museum. Photograph taken in April 2019.



² 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