

Annex B

Draft Environmental Monitoring and Audit Manual

Comments and Responses

Agreement No. CE 82/97
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Investigation and Preliminary Design Assignment

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<p>Item 1 : District Officer (Islands) Islands District Office Ref: (4) in IS 111/3/54 Dated 28 January 1999</p> <p>I have no comments on the report, please.</p>		Noted
<p>Item 2 : Commissioner of Police Traffic Management Bureau Ref: (18) in CP/T/TMB 22/9 Pt.12 Dated 29 January 1999</p> <p>Thank you for sight of the above. This department does not however have any comment upon its' content.</p>		Noted
<p>Item 3 : Project Manager/NT North New Territories North Development Office Ref: () in NTN RU 2/10/57(A) Pt.3 Dated 30 January 1999</p> <p>I refer to your letter dated 25.1.1999 and have no comments on the above draft EM&A Manual for the captioned project.</p>		Noted
<p>Item 4 : District Officer (Tsuen Wan) Tsuen Wan District Office Ref: (12) in TW D3/51 XIV Dated 1 February 1999</p> <p>I refer to your letter of 25.1.99 and have no comment on the captioned Manual.</p>		Noted
<p>Item 5 : District Lands Officer, Islands Lands Department Ref: (8) in DLO/IS 30/5 Pt.13 IS Dated 1 February 1999</p> <p>Thank you for your letter of 25.1.1999 in which you enclose a copy of the above manual for my comment.</p> <p>I confirm that I have no comment on the above manual.</p>		Noted
<p>Item 6 : Marine Officer/Planning & Development (3) for Director of Marine Marine Department Ref: (5) in PA/S909/2/58/1 (13) Dated 3 February 1999</p>		

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<p>Thank you for your letter of 25.1.1999.</p> <p>I have no comment on the captioned draft manual.</p> <p>Item 7 : Chief Engineer/Planning Water Supplies Department Ref: (7) in WSD 1745/11/97 Pt.4 Dated 3 February 1999</p> <p>Your letter of 25 January 1999 refers. We have no comment from the water supply planning point of view on the captioned report. Our MNW Region will provide their comments if any separately to you.</p> <p>Item 8 : Chief Highway Engineer/Structures Highways Department Ref: () in STR 5/30/16 Dated 4 February 1999</p> <p>I refer to your letter of 25.1.99 with which you enclosed the Draft Environmental Monitoring and Audit Manual for the captioned assignment.</p> <p>Please be advised that I have no comment on the above manual from highway structures point of view.</p> <p>Item 9 : Project Manager/HKI & Is Hong Kong Island and Islands Development Office Ref: () in HKIS 4/2/86 Dated 4 February 1999</p> <p>I refer to your letter of 25.1.99 and wish to inform you that I have no specific comments to make regarding the above draft manual.</p> <p>Item 10 : Chief Engineer/Port Development Civil Engineering Office Civil engineering Department Ref: (65) in PD5/3/7 Pt.5 Dated 5 February 1999</p> <p>I have no comments to make on the above draft report attached to your letter dated 25 January 1999.</p> <p>Item 11 : Project Manager (NT West) NT West Development Office Ref: (38) in NTW/ 4/3/77 Pt.3 Dated 6 February 1999</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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<p>Your consultants have circulated the captioned Manual to this office for comment directly. Please informed that I have on comment on the captioned Manual.</p> <p>Item 12 : District Lands Officer, Tuen Mun Lands Department Ref: (19) in DLOTM/131/3/82/1 VII Dated 8 February 1999</p>		Noted
<p>I refer to your letter of 25 January 1999</p> <p>I have no comments to make on the said Manual.</p> <p>Item 13 : Government Engineer/Strategic Infrastructure, Transport Department Ref: SR 146/180-6 Dated 8 February 1999</p>		Noted
<p>Thank you for your letter dated 25 January 1999 enclosing the above Manual for our comment. I have no comment.</p> <p>Item 14 : Chief Highway Engineer/N.T. West Highways Department Ref: (8) in HNT 41/425 VII Dated 8 February 1999</p>		Noted
<p>I have no comment on your above draft manual.</p> <p>Item 15 : Director of Regional Services Regional Services Department Ref: (6) in RSD 4/HQ 715/97V Dated 9 February 1999</p>		Noted
<p>Please note that this Department has no comment on the Draft Environmental Monitoring and Audit Manual.</p> <p>Item 16 : District Officer (Tuen Mun) Tuen Mun District Office Ref: (26) in TM 131/1/38 VIII Dated 10 February 1999</p>		Noted
<p>I refer to your above quoted letter.</p> <p>From the Tuen Mun District Office point of view, I have no comment on the captioned manual.</p>		Noted

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<p>Item 17 : Chief Town Planner/Strategic Planning Planning Department Ref: S/TT/67A(SP) Dated 11 February 1999</p> <p>Thank you for your above referenced letter dated 25th January 1999 concerning the captioned subject. I have no comment to make on the captioned report.</p>	<p>Noted</p>
<p>Item 18 : Chief Engineer 1/Major Works Highways Department Ref: (27) in HYMMI 715TH/7/10/2 Pt.2 Dated 11 February 1999</p> <p>I refer to your letter dated 25.1.99 regarding the above and have the following comments on the Draft Environmental Monitoring and Audit Manual:</p>	<p>Noted</p>
<p>1. Cover page, add "Southern Section" under "Draft Environmental Monitoring and Audit Manual";</p>	<p>Noted and text will be amended accordingly</p>
<p>2. Table 1.1, why Poseidon Court was not included as an ASR?</p>	<p>The impact at Poseidon Court will be monitored by AM6 which is Scattered House to the West of Poseidon Court</p>
<p>3. Page 1-6, NSR SL-N5 cannot be found in Figure No. 1.9,</p>	<p>Noted and the figure will be amended</p>
<p>4. Section 1.5, a) Line 1, Figure 1.4 cannot be found;</p>	<p>Noted and figure will be added in the Final EIA Report</p>
<p>b) I presume the preliminary construction programme will be in line with Deliverable No 58 "Report on Programme and Phasing of Works and Packages" to be submitted;</p>	<p>Agreed.</p>
<p>c) Table 1.4, I presume Deliverable No 58 will take into consideration the EIA recommendation on the re-use of the excavated materials in the planning, programme and phasing of the works and packages;</p>	<p>Agreed.</p>
<p>5. Section 2.1, is there a need to monitor radon level during tunnel construction?</p>	<p>As sufficient ventilation will be provided for tunnel construction, adverse impact from radon is not expected and monitoring during construction phase is therefore not required</p>

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6. Table 2.1, since large residential sites such as Hong Kong Garden and Poseidon Court are not included as dust monitoring stations, can the dust level at these sites be interpreted from the limited number of dust monitoring stations?		Dust impact will be monitored at the worst affected locations in the area, which are the Grand Bay Villa at Tsing Lung Tau and Scattered houses to the West of Poseidon Court in Siu Lam/So Kwun Wat. Dust level monitored at these location is therefore representative of the area.
7. Table 2.2, for 1 Hour TSP Level in $\mu\text{g}/\text{m}^3$, please check whether there should be a "1/2" in the formulae "Action level = (Baseline level*1.3+Limit Level)";		Yes and table will be amended accordingly
8. Table 3.1, should the existing and planned school sites be included as noise monitoring stations?		Noted. Existing schools will be included as noise monitoring stations
9. Section 3.5, please state who shall carry out the impact monitoring;		The ET will be responsible for the impact monitoring
10. Section 4, a) Page 4-3, Tables 4.1 and 4.2, why TAT levels instead of AL levels are used? b) why reference was not made to the Generic Environmental Monitoring and Audit Manual in compiling this section?		This will be revised to use AL levels. This information will be provided in the final EM&A Manual.
11. Section 6, a) are there any responsibilities to be assigned to the ET in respect of EM/A of the impacts on ecology and fisheries; b) are there any AL levels to be specified for EM/A of the impacts on ecology and fisheries;		Information will be provided in the final EM&A Manual.
12. Page 9-2, are there any other operation phase EM/A;		No, only tunnel air quality will require monitoring
13. Figure 1.1, the extent of the connection to Road P1 shown is very much longer what it should be;		Noted and figure will be amended accordingly
14. Figures 1.12 and 4.1, it is not clear whether water quality monitoring stations will be placed at the gazetted beach, sea water		As no impacts have been identified at these areas it is not expect that maintaining stations are requested at these areas.

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<p>15. Figure 7.1, please refer to Highways standard complaint response procedures in compiling the action flow chart;</p>	Noted.
<p>16. Other general comments:</p> <p>a) in specifying all obligations expected to be fulfilled by the Contractor and/or ET, please use "shall" instead of "should";</p> <p>b) in compiling the Implementation Schedule, please check against the EIA Final Assessment Report to make sure that all assumed construction methodology or prescribed temporary works etc forming the basis of the impact assessment and mitigation recommendations should also be included. I consider that at least the following items recommended in the Draft EIA Final Assessment Report should be included in the Implementation Schedule:</p> <p>i) Page 4-12, the paragraph entitled "Tai Lam Chung Tunnel", "The Tai Lam Chung road and the existing WSD service road will be widened as the main haul road for this construction area";</p> <p>ii) Page 4-13, the 2nd paragraph under "Siu Lam", "For the Siu Lam cutting, excavated materials will be removed by a conveyer belt located along the Tai Lam Chung Nullah";</p> <p>iii) Page 4-36, the paragraph below Table 4.43, "In view of the close proximity and high construction noise exceedances at Grand Bay Villa, it is recommended that the provision of noise insulation to Grand Bay Villa should be provided prior to the construction of the Route 10 (NLYLH)."</p> <p>iv) Page 4-52, the 3rd paragraph under "Residual Impacts", "Predicted results indicate that approximately 340 dwellings will be eligible for indirect technical remedies in the form of window insulation and air conditioning subject to Exco approval. Pending Exco's approval, it is recommended that a Detailed Noise Insulation Works Study be carried out at the Detailed Design stage to identify the exact requirements of noise insulation."</p>	<p>Noted and text will be amended accordingly</p> <p>Noted and text will be amended accordingly</p> <p>Noted and text will be amended accordingly</p> <p>Noted and text will be amended accordingly</p>

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<p>Please incorporate the above comments in finalizing the Environmental Monitoring and Audit Manual.</p>	<p>Noted and comments will be incorporate in finalizing the Environmental Monitoring and Audit Manual.</p>
<p>Item 19 : Chief Town Planner/Strategic Planning Planning Department Ref: S/TT/67A(SP) Dated 15 February 1999</p>	
<p>I have the following additional comments on the captioned report.</p>	
<p>General Comment</p>	
<p>1. Basis of EM&A - Whilst the EIA is yet to be agreed, it is considered preferable to review the EM&A on the basis of the fully endorsed EIA findings and recommendations to reflect the comprehensive picture and I presume the report would be revised after the EIA is finalised.</p>	<p>Noted</p>
<p>2. Defining Sensitive Receivers - As the location and actual scope of NSRs and ASRs are defined on the basis of residential population and sensitive landuses, it is important to verify the latest position rather than relying on secondary sources. For instance population should be based on updated figures/surveys for villagers in Lantau rather than adopting the 1996 by - census. The assessment should also make reference to planned/committed development, such as the residential development and theme park for Ma Wan, in addition to existing SRs to provide more accurate findings on the potential impacts.</p>	<p>Noted</p>
<p>3. Landscaping and Visual Aspects</p> <ul style="list-style-type: none"> • In view of the significant excavation along the entire North Lantau coastal slopes and the headland, there should also be guidelines on good site practices to visual aspects and internal arrangement of work sites should be adopted throughout the construction period, such as stock piling, earthwork, excavation, dumping, storage of material and plants etc. 	<p>Information will be provided.</p>
<ul style="list-style-type: none"> • Active monitoring and reporting on the visual and landscape proposals recommended by the EIA after construction phase should also be maintained to reduce the potential 'scaring' effect. This is also in line with the Administration's recent effort for smartening of the gateway corridor. 	<p>Noted</p>

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<p>4. Operational Phase EM&A - The purpose of the report is to provide guidance for the EM&A programme to address the environmental impacts arising from both the construction and operation stage identified in the EIA. In view of the very limited coverage on the control of the operational stage, there is a need to substantially elaborate more in this section to tie in with the endorsed recommendations of the EIA. For instance, according to the ES of the draft EIA, residual impacts in respect of noise would still need to be monitored while landscape issues are yet to be resolved.</p>	<p>Noted</p>
<p><u>Specific Comments</u></p>	
<p>5. Air Quality</p> <ul style="list-style-type: none"> • For air quality, there is concern on whether only one monitoring station at Tso Wan is adequate to represent the dust sensitive receivers in the entire North Lantau area, both at the construction and operational phases. • For para. 9.2, please clarify whether there would be monitoring of RSP and TSP level, in addition to Cox and Nox, which is particularly important for the North Lantau section where port traffic would predominate. • What would be the site specific mitigation measures that the ET may reply on to address residual dust problems, when all the regular remedial measures and action plan mentioned in para 2.7 - 2.9 are exhausted. 	<p>Tso Wan is the worst affected ASR and has therefore been selected as the monitoring station. Other receivers will be less affected compared to Tso Wan and monitoring is therefore not necessary. Operational phase monitoring is not required for North Lantau. out of the two ASRs assessed in North Lantau</p> <p>According to the EPD's Practice Note on Control of Air Pollution in Vehicle Tunnels, CO, NO2 and visibility are the 3 indicative air pollutants to be monitored for tunnel air quality.</p> <p>No residual dust impact is expected. Should the limit level be exceeded repeatedly the ET will advise the ER to stop the aspect of work responsible for the exceedance until the exceedance is abated.</p>
<p>6. Noise Quality</p> <ul style="list-style-type: none"> • Please clarify whether construction outside normal hours would be allowed within the threshold of the NSRs and if so the justifications. There is concern on the practicability of installing movable noise barriers for all kinds of noise generating plants and construction activities. • What would be the site specific mitigation measures that the ET may reply on to address residual noise levels when all the regular remedial measures and action plan mentioned in para 3.7 - 3.9 are exhausted. 	<p>Construction outside normal hours would only be carried out with a Construction Noise Permit. Conditions stipulated in CNPs should be strictly followed by the contractor</p> <p>Specific mitigation measures such as further limiting the number and type of noisy plant use within a certain distance from the affected NSRs could be employed</p>

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<p>7. Waste Management - Transport of excavated material, barging activities during the construction is likely to result in waste impact not only on land but also along the coastal waters and the marine route that need to be examined together with the land impact.</p>	<p>Impacts to coastal waters during transportation of excavated materials has been addressed in Water Quality Section. Impacts to marine route has been assessed in Section 5.5 of the EIA Report and concluded that the increased number of traffic would not create any major impacts on marine shipping routes.</p>
<p>8. Ecology and Fisheries -</p> <ul style="list-style-type: none"> • Whilst the site specific measures recommended in para 6.2 aims to contain actual damages during construction through fenced-off works area, selection of haul road and prevention of open fires, I have serious doubt as to whether they can effectively address the more indirect and off-site impacts on terrestrial ecology that are unavoidably affected by the project. For instance, transplanting of rare plants has been previously mentioned in the initial EIA and should be further investigated in this report. • Please elaborate on the effectiveness of visual surveillance and air bubble curtain as means to address impacts of underwater blasting to dolphins and undersea habitats. • For para 6.4, please explain what exactly are the remedies designed to detect and mitigate water quality impacts on marine ecology and fisheries resources and the effectiveness of such measures. 	<p>With the implementation of the recommended measures checked by regular environmental audit by on-site staff, potential adverse impact on the areas outside the worksites is not expected.</p> <p>Such techniques have been proposed for other projects and visual surveillance proved effective.</p> <p>Details to be provided later.</p>
<p>9. Off-site Monitoring - For para 7.1, it is fully agreed that environmental conditions outside the site area should also be reviewed as an integral part of the EM&A. It should be desirable to give more detailed guidelines and the scope of off-site monitoring activities.</p>	<p>Noted</p>
<p>Item 20 : Director of Agriculture & Fisheries Agriculture & Fisheries Department Ref: (84) in AF DVL 14/52 VI Dated 19 February 1999</p> <p>I refer to your letter dated 20 January 1999 and 25 January 1999 concerning the captioned Draft EIA Final Assessment Report and Draft Environmental Monitoring and Audit manual respectively. I have the following comments on the reports:-</p> <p><u>Draft Environmental Monitoring And Audit Manual</u></p>	

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<p><u>Section 4</u></p> <p>(a) Monitoring Regime describing details of the baseline, impact and post-project monitoring should be included in this section.</p> <p>(b) In view of the fast current at the Kap Shui Mun channel and closeness of the Ma Wan fish culture zone to the dredging site, two monitoring stations for water quality should be added as indicated in the attached map.</p> <p>(c) Two control stations should be included one for ebb and one for flood tide (see the map attached). The control stations are suggested to move further away from the dredging site in view of the current condition.</p> <p><u>Section 6.2 and Annex - Implementation Schedule</u></p> <p>(a) I note that a number of mitigation measures recommended in Draft EIA report have not been included in this Draft EM&A manual. Please clarify and amend it as appropriate.</p> <p>(b) The consultants are reminded that our comments on the Draft EIA report also applied to this EM&A manual. Please make appropriate amendments as those in the EIA report.</p> <p>Item 21 : Chief Engineer/Mainland North West Water Supplies Department Ref: (3) in WSD/MNW 1744/11/98/92 Pt 13 Dated 23 February 1999</p> <p>I refer to your letter ref. ASB/JDCB/AWZ/dl/T524/30/10/HO0260 dated 25.1.99. Since part of the works of the Route 10 project will be carried out within our Water Gathering Ground (WGG), Section 4 of the captioned Draft Manual shall be expanded to include the monitoring of surface water quality collected in our WGG. Moreover, we suggest to add para. 4.8 and Annex B to the Manual as attached.</p> <p>Item 22 : District Planning Officer/Sai Kung and Islands, Planning Department Ref: () in LI/D/LP/9 Pt.22 Dated 2 March 1999</p> <p>I refer to your fax message dated 24.2.1999 enclosing the responses to our previous comments on the captioned reports. My further comments are as follows:</p>	<p>Agreed. Details will be included in the Final EM&A Manual.</p> <p>Noted. The fast current and the bulk exchange of water through this channel, in concert with the fact that the fish culture zone is located on the opposite side of the channel to the Fish Culture zones will significantly reduce the impacts of dredging.</p> <p>Noted. These will be included taking note of the pont made above.</p> <p>Only mitigation measures that are enforceable at the construction stage will be included in the EM&A Manual.</p> <p>Noted</p> <p>Noted. This will be reviewed and the EM&A manual revised accordingly.</p>

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<u>Page 9, Point 5 : Air Quality</u>	
7. In addition to Tso Wan, Fa Peng is a recognised village that might require air monitoring station during construction stage. Please advise.	Please refer to item 19.
8. For operational stage, the villagers at Tso Wan and Fa Peng, and other possible air sensitive receivers near the toll plaza area (subject to recommendations in Northshore Lantau Development Feasibility Study) might be affected by Route 10. Please consider to add air monitoring stations in North Lantau despite the fact that there is no tunnel section in North Lantau.	Please refer to item 19.
<u>Page 9, Point 6 : Noise Quality</u>	
9. Please provide response to the practicability of installing movable noise barriers	Moveable noise barriers have implemented on a wide range of infrastructure projects in Hong Kong. The use of moveable noise barriers have only been recommended for stationary or semi-stationary plant and are considered to be practical for the construction activities related to this Project.
Item 23 : Director of Agriculture & Fisheries	
Ref: () in AF	
Dated 25 March 1999	
I refer to your fax message dated 12.3.1999. My comments on the captioned documents are attached.	
Comments from Marine Conservation Division, AFD	
General	
(a) The possible impact of underwater blasting on Chinese White Dolphin is a key issue on which we have little previous experience. More information is therefore needed to help confirm the acceptability of underwater blasting on dolphins. In this regard, it is desirable to critically review the need of underwater blasting for the captioned project and examine whether there is any alternative ways of construction. In other words, the feasibility of using avoidance as a mitigation measure for impact of underwater blasting should be carefully assessed.	Noted. Underwater blasting is necessary for this project. The possible impact of underwater blasting on Chinese White Dolphin would be mitigated to be minimal and therefore acceptable (see section 7.4.6).

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<p>Specific</p> <p>(b) Section 7.4.1, Epifaunal Benthic Assemblages, page 3, last paragraph, line 7. Sea pens were said to be of ecological value, please elaborate why.</p> <p>(c) Section 7.4.1, Intertidal, page 4</p> <p>(i) Second paragraph. Please indicate the locations of rocky intertidal habitats within the study area.</p> <p>(ii) Last paragraph. Only gazetted swimming beaches were mentioned here. Are there any natural sandy shores found within the Study Area, for example, on the Lantau Island side?</p> <p>(d) Section 7.4.2, Ecological Importance, page 6. Both the Tsing Lung Bridge North Tower area and the Toll Plaza area were not and should be specifically addressed in the previous Baseline Information section. Please also clarify whether intertidal surveys have been conducted at Tsing Lung Bridge North Tower area.</p> <p>(e) Table 7.7, page 7</p> <p>(i) Intertidal Hard Bottom Habitat, Naturalness. Please clarify the amount of natural coastline and artificial coastline that will be affected.</p> <p>(ii) Intertidal Hard Bottom Habitat, Summary. The conclusion of a medium ecological value seems to be inconsistent with previous description in this table stating part of the coastline is artificial and is disturbed by human impact. Please re-examine whether the conclusion of medium ecological value is really appropriate.</p> <p>(iii) Subtidal Soft Bottom Habitat of Tsing Lung Tau and Toll Plaza, Abundance. Please explain why the abundance of subtidal organisms is considered low since there is no information in the Baseline Information section that substantiate this statement.</p>	<p>Noted. 'Sea pens' will be deleted from the sentence.</p> <p>Noted. The text will be revised to indicate the locations of rocky intertidal habitats within the Study Area.</p> <p>The text will be revised to include classification of natural sandy shores within the Study Area (see section 7.4.1 Intertidal).</p> <p>Noted. The text will be revised to clarify the issue.</p> <p>Noted. The text will be revised as suggested.</p> <p>Noted.</p> <p>Based on North Lantau and South Tsing Yi</p> <p>Noted. The text will be revised.</p>

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<p>(f) Table 7.8, Sandy Shore. Unless there is no other natural sandy shores apart from the gazetted swimming beaches (which cannot be regarded as entirely natural) near Tsing Lung Tau, otherwise the assessment on sandy shore should include these natural sandy intertidal habitats as well. My comment (c)(ii) above is also relevant.</p>	<p>Noted. The text will be revised.</p>
<p>(g) Section 7.4.3, Sensitive Receivers, page 10.</p> <p>(i) Second sentence. Previous discussion has only addressed the ecological value of rocky intertidal zone at the construction sites, not the whole study area. In addition, only gazetted swimming beaches were included in the assessment of sandy intertidal shore. This sentence is therefore not substantiated and has to be rewritten.</p>	<p>Noted. The text will be revised.</p>
<p>(ii) Last sentence. Please state the rationale of defining a sensitive receiver. Medium ecological value intertidal rocky shore is not regarded as a sensitive receiver whereas medium ecological value dolphin habitat is treated as a sensitive receiver, please explain. However, please note my previous comment (e)(ii) above.</p>	<p>Noted. The text will be revised.</p>
<p>(h) Section 7.4.4, Habitat Loss, page 10. Please provide the area of different habitat types that would be lost, i.e. rocky intertidal, hard bottom subtidal, soft bottom subtidal, at Tsing Lung Bridge North Tower.</p>	<p>Noted. The text will be revised.</p>
<p>(i) Section 7.4.4, Underwater Blasting, page 11. Please provide us much information as possible about the possible impact of underwater blasting on dolphins. Both direct impact due to shock waves, and indirect impact due to underwater noise, should be further elaborated. In addition, does the noise frequency due to underwater blasting is particularly damaging to dolphins?</p>	<p>Noted. The text will be revised to provide more information about possible impact of underwater blasting on dolphins.</p>
<p>(j) Section 7.4.4, Other Indirect Impacts, last paragraph, last sentence, page 13.</p> <p>(i) It is said that the impact would be of short duration. Please clarify how long would the construction work last.</p>	<p>Noted. The text will be revised to clarify the duration of construction.</p>

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<p>(ii) Please add that the areas near the construction sites are not considered as preferred habitats for the dolphins to help substantiate that the impact would be acceptable.</p>	<p>Noted. The text will be revised as suggested.</p>
<p>(k) Section 7.4.5, Impact Evaluation, page 14.</p> <p>(i) Size. Please provide separate figures for different types of habitats, i.e. rocky intertidal, hard-bottom subtidal and soft-bottom subtidal habitats.</p>	<p>Noted. The text will be revised as suggested.</p>
<p>(ii) Reversibility. Again, please provide separate figures for different types of habitats, i.e. rocky intertidal, hard-bottom subtidal and soft-bottom subtidal habitats. It is noted that 8.1 ha is regarded as small. What is the consultant's criteria for "small"? What size would be considered as "large"?</p>	<p>Noted. The text will be revised.</p>
<p>(l) Section 7.4.6, page 15, first paragraph. Please provide the approximate area of seawall that would be suitable for re-colonization and specify what type of seawall it is.</p>	<p>Noted. The text will be revised to specify this seawall design and assess the approximate area of seawall for recolonization.</p>
<p>(m) Section 7.4.6, page 15, second paragraph, second bullet,</p> <p>(i) Please confirm this mitigation measure needs to be implemented in order to mitigate the impact to acceptable levels.</p>	<p>Noted. The text will be revised.</p>
<p>(ii) Please include information on the effectiveness of bubble curtain in reducing the impact of underwater blast and noise.</p>	<p>Noted. The text will be revised to incorporate additional information.</p>
<p>(iii) Is there any information indicating the area of possible impact to dolphins due to underwater blasting? Will the consultant recommend a maximum amount of explosives to be used each time in order to minimize possible impacts?</p>	<p>Noted. Successful mitigation measures adopted by the Airport Authority in mitigating underwater blasting during the airport construction at Chek Lap Kok have been recommended to protect the dolphins.</p>
<p>(n) Section 7.4.7, page 15. Please provide separate figures for different types of habitats, i.e. rocky intertidal, hard-bottom subtidal and soft-bottom subtidal habitats.</p>	<p>This information will be provided.</p>

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Draft Environmental Monitoring & Audit Manual

Comments and Responses

Comments	Responses
<p>Item 24 : Major Works Project Management Office, Highways Department Ref. (24) in HMW1 715TH/7/10/2 Pt.3 Dated 7 May 1999</p> <p>As the EIA Final Report is still being finalised to reflect EPD and AFD's requirements, I envisage that such amendments will warrant some revisions to the relevant parts of the Draft EM&A Manual. Therefore, I would like to reserve my comments until such revisions are made. Nonetheless, please note that, with regard to "Operational Phase Noise Monitoring" (para 9.3), the present agreement between EPD and HyD is that HyD will only undertake to carry out monitoring during the Maintenance Period TWICE.</p> <p>Regarding the Draft EM&A Manual Comments and Responses, I have the following observation:</p> <p>Page 9, item 5 Air Quality, 1st bullet - The last sentence of your responses is incomplete. Please check and amend.</p> <p>Item 25 : Chief Highway Engineer/NT West Ref. (10) in HNT 41/425 XI Dated 14 May 1999</p> <p>In page A-12 under EIA Ref. 13.4, I presume that noise monitoring during the first year of the operation phase will be undertaken by the project office and any further monitoring beyond the first year, if required, will be undertaken by EPD.</p>	<p>Agreed.</p> <p>Noted, the necessary amendments will be made.</p> <p>Agreed.</p>