

Appendix 8.9 – Justification for Off-site Woodland Compensation

EIAO-TM Annex 16		Justification
Clause 5.4.3	From an ecological point of view, mitigation measures for ecological impact shall preferably be carried out on-site, and well in advance of the works rather than off-site, and after the completion of works	Limited space within the Project site; <ul style="list-style-type: none"> - The proposed Project site largely follows the existing Lion Rock Tunnel Road (LRTR); - On-site woodland compensation is considered not practicable within Project site; and - Off-site mitigation measure near the Project boundary is the only solution to compensate for the loss of woodland under the Project.
Clause 5.4.4	Where off-site mitigation measures are involved, they shall be considered along with other alternatives e.g. change of site, layout, etc., including modifying or abandoning the project.	<p>The Kowloon bound and Shatin bound Lion Rock Tunnel (LRT) tunnel tubes have been put in use for over 50 years and 40 years respectively. Signs of deterioration of tunnel structures have become apparent. Due to heavy traffic demand, the time slots of only a few hours during night-time for tunnel closure cannot allow comprehensive repair and strengthening works to be undertaken. Furthermore, being an old design, the LRT does not meet the current standards in various aspects including waterproofing, dimensions (e.g. headroom and width), smoke extraction, evacuation, durability, Traffic Control and Surveillance System, etc.</p> <p>As LRT and LRT Road are already operating close to or above capacity, they could not cope with the ever-growing traffic demand. This has led to long traffic queues to appear along the connecting roads including the LRT Road at Shatin side, as well as the Lung Cheung Road and Waterloo Road at Kowloon side.</p> <p>Due to the above, the improvement of LRT aims to:</p> <ul style="list-style-type: none"> - To comprehensively rehabilitate of the two existing tunnel tubes - Enhancing the capacity of the LRT and the connecting roads as far as possible is also necessary to improve the traffic flow at this critical link between Shatin and Kowloon. - To enhance the traffic conditions of Lion Rock Tunnel Road <p>Thus, it is necessary to conduct proposed works at Project site and other alternative sites for improvement of LRT are considered not feasible.</p>
Clause 5.4.5	All possible design measures and all practicable on-site ecological mitigation measures shall be fully investigated in the EIA study and exhausted to minimise the loss or the	The Project footprint has revised to preserve the woodland along LRTR and woodland south to LRT toll plaza within LRCP as far as possible (Sections 8.8.2 to 8.8.11 of EIA Report refer).

	<p>damage caused by the project to the ecological habitats or species;</p>	
	<p>According to the methods and criteria laid down in this annex and Annex 8. Before off-site ecological mitigation measures are to be adopted, the EIA study needs to confirm that it is necessary to mitigate the residual ecological impacts based on ecological considerations set out in this Annex and Annex 8, and that such residual impacts arise from the Project in question;</p>	<p>Due to the limited space within Project site, no on-site mitigation measures for loss of 0.25 ha of woodland within LRCP (which is considered of moderate to high ecological value) can be implemented (Section 8.10.37 of EIA Report refers). The temporary loss of 0.13 ha woodland would be reinstated on site in accordance with the Preliminary Reinstatement Plan (Appendix 8.8 refers) but off-site mitigation for the temporary loss of woodland within LRCP is also recommended to shorten / off-set the time lag during the construction phase.</p>
	<p>If the residual ecological impacts require mitigation and all practicable on-site ecological mitigation measures have been exhausted, off-site ecological mitigation measures shall be provided.</p>	<p>The ecological impact resulting from loss of ~0.25 ha woodland is considered of low to moderate significance and will require off-site compensation as on-site compensation is considered not practicable. The temporary loss of 0.13 ha woodland would be reinstated on site in accordance with the Preliminary Reinstatement Plan (Appendix 8.8 refers) but off-site mitigation for the temporary loss of woodland within LRCP is also recommended to shorten / off-set the time lag during the construction phase.</p>
	<p>The off-site mitigation measures shall be on a "like for like" basis, to the extent that this is practicable. That is to say, any compensatory measures to be adopted for mitigating the residual ecological impacts must be directly related to the habitats or species to be protected. Either the same kind of species or habitats of the same size shall be compensated, or the project proponent shall demonstrate that the same kind of ecological function and capacity can be achieved through the measures to compensate for the ecological impacts. For example, the loss of a natural woodland shall be compensated by the replanting of native trees to form a woodland of a similar size where possible</p>	<p>Unavoidable woodland loss is required to be mitigated by planting of native woodland mix and the establishment of at least 0.25 ha ecological compensatory woodland as a "like-for-like" measure (Sections 8.10.37 and 8.10.38 of EIA Report refers). Woodland compensation area of ~0.3 ha is identified and the details are provided in Appendix 8.10.</p>
	<p>the off-site ecological mitigation measures shall only be implemented within the boundaries of Hong Kong, and must be technically feasible and practicable;</p>	<p>Yes. The proposed compensation woodland will be provided in a government land west to Sha Tin South Fresh Water Service Reservoir and within the boundaries of Hong Kong. The proposal is considered technically feasible and practicable.</p>

	<p>the extent of such mitigation measures shall be limited to what is necessary to mitigate the residual ecological impacts arising from the project; and</p>	<p>Yes. It is proposed to compensate for woodland loss through woodland mix planting not less than 0.25 ha.</p>
	<p>any proposed off-site mitigation measures shall not require further EIA study for their implementation. Their feasibility, constraints, reliability, design and method of construction, time scale, monitoring, management and maintenance shall be confirmed during the EIA study.</p>	<p>The proposed off-site compensatory planting is not considered as a Designated Project under EIAO. The proposed woodland compensation site of government land has been reviewed and found suitable for woodland compensation, and details are provided in the Preliminary Woodland Compensation Plan (Appendix 8.10 refers).</p>