



November 30, 2005

TO: Panel on Planning, Lands and Works - Special Meeting 17 Dec, 2005 - Tamar
Fax: 2869-6794
email: cshiu@legco.gov.hk

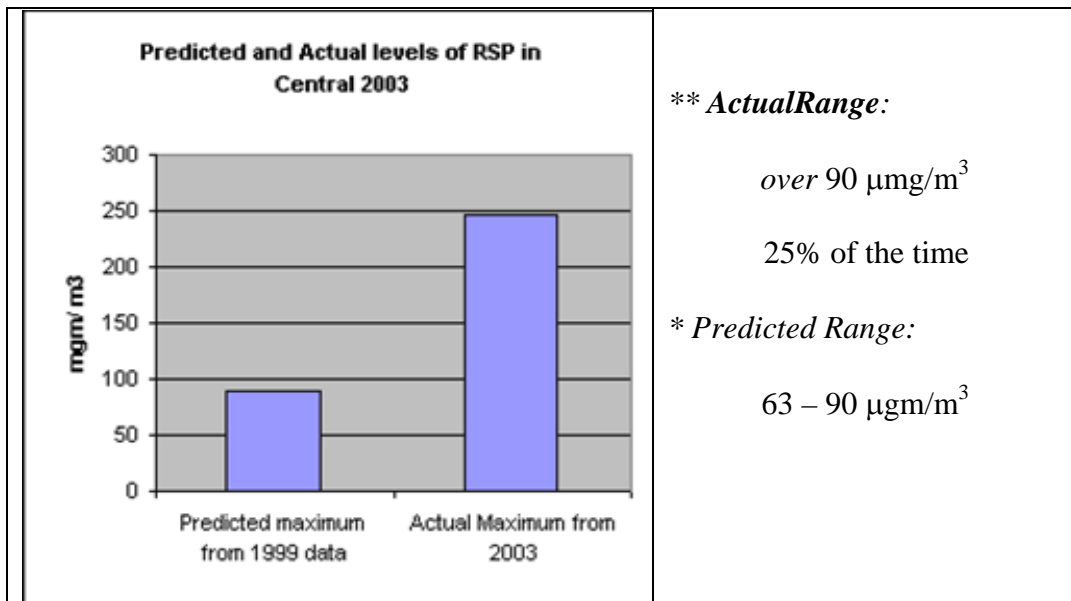
Honorable Chair and Members,

We ask that you not accept anything from the Government regarding the Tamar site until the Environmental Impact Assessment (EIA) for CRIII is updated with recent, actual air pollution data using a proper model that includes the “canyon effect” of our buildings in trapping air pollution.

We note the following regarding the results of the EIA shown to you in 2001.

1. The predictions were wrong – the EIA is no longer valid
2. The model used in the EIA assumes Central is a flat surface
3. There is no urgency. There is time to do a new report properly with current data and the correct model (estimated 3 months and \$300,000)

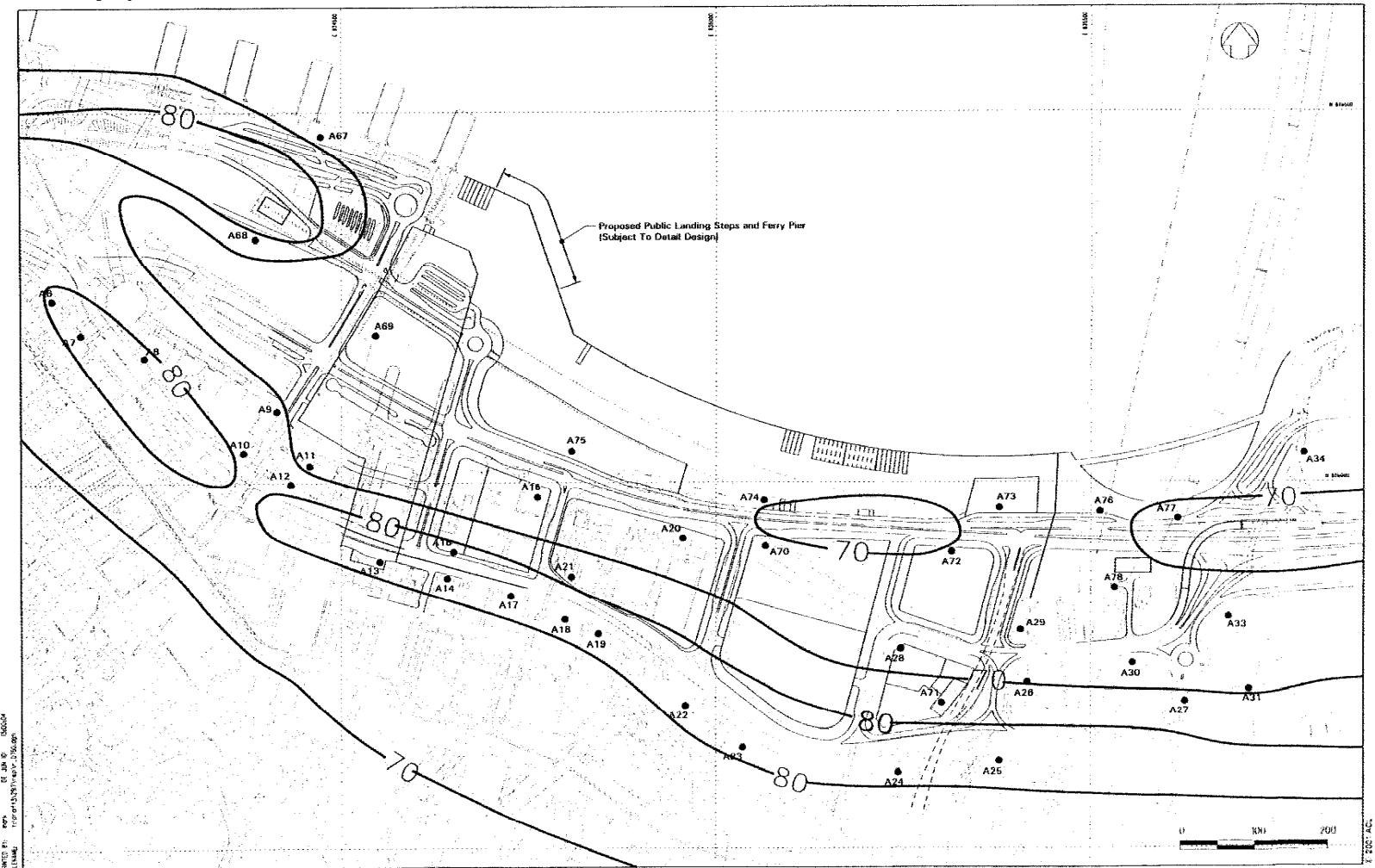
Comparison of predicted and actual 24-hour Average RSP



* Environmental Impact Assessment (July 2001) supported by Urbis Limited, Babbie BMT Harris & Sutherland
Regards

** Data from Environmental Protection Department Central roadside air pollution monitoring station 2003

Annelise Connell
Vice Chairman, Clear the Air



Contours of Predicted Cumulative Maximum 24-Hour Average RSP Concentrations in μgm^3
Contours at 1.5m Above Ground Level

Figure 8.4



South China Morning Post
Sunday November 20 2005

Tamar pollution prediction 'far too low'

Niki Law

Official environmental report 'pretends Central has a flat surface' with no tall buildings, say experts

Official figures seriously underestimate the pollution levels people will face in Central once the new government offices are built at the Tamar site and the surrounding district developed, it has been claimed.

The Sunday Morning Post has learned that air pollution could be three times higher than predicted by the Environmental Protection Department's 2001 environmental impact assessment (EIA) report, due to miscalculations.

Annelise Connell, vice-chairwoman of Clear the Air, says pollution predictions on the Tamar site and the Central Reclamation Phase III were based on 1999 data plugged into a prediction model that assumes Central has no buildings.

'The entire air pollution assessment is useless,' she said. 'There is not a chance in the world that the real numbers are within objective. The CRP III and Tamar site project would not have been approved if the real figures had been used.'

In the assessment, suspended particles (RSP) at the Central roadside station were not expected to exceed an average concentration of 80 micrograms per cubic metre and the Air Pollution Index was expected to remain below 100. In reality, the RSP

figure has been as high as 257 micrograms and the API has reached 100 some 97 times.

...

Meanwhile, air-quality-modelling expert Jimmy Fung Chi-hung says the government's pollution model 'pretends Central is a flat surface' and ignores the fact that pollution gets trapped.

The University of Science and Technology associate professor said a 'deep canyon' of pollution was created when buildings by the road were twice as high as the width of the road. 'Pollution is three times higher than in places where air can flow freely. If you have doubts, just think of how bad the air is in Causeway Bay,' he said.

'For a two- to three-lane road, a three-storey commercial building is high enough to create a deep canyon. Cars release exhaust very close to the ground. Central's canyon would be very deep.'

He suggested the government produce another report using a newer model that considers the buildings. This would take about three months and cost \$300,000.

However, the department is standing by its methods and findings. Asked by the Post for comment, a spokeswoman said the study had been conducted in line with EIA procedures and the public and the Advisory Council on the Environment had been consulted before the report was approved.

The Constitutional Affairs Bureau felt there was no need to delay the Tamar project, which a spokesman said would have 'no significant impact on the air pollution in the Central Business District'.