# Appendix B. Environmental Mitigation Implementation Schedule

## **Environmental Mitigation Implementation Schedule**

### **HKIA-HKBCF** Road Connection

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Air Quality							
S5.5.6.1	A1	The contractor shall follow the procedures and requirements given in the Air Pollution Control (Construction Dust) Regulation	Good construction site practices to control the dust impact at the nearby sensitive receivers to within the relevant criteria.	Contractor	All construction sites	Construction stage	To control the dust impact to within the HKAQO and TM- EIA criteria (Ref. 1-hr and 24-hr TSP levels are 500µg/m <sup>3</sup> and 260µg/m <sup>3</sup> , respectively)
S5.5.6.2	A2	<ul> <li>Proper watering of exposed spoil should be undertaken throughout the construction phase:</li> <li>Any excavated or stockpile of dusty material should be covered entirely by impervious sheeting or sprayed with water to maintain the entire surface wet and then removed or backfilled or reinstated where practicable within 24 hours of the excavation or unloading;</li> <li>Any dusty materials remaining after a stockpile is removed should be wetted with water and cleared from the surface of roads;</li> <li>Stockpile of dusty material should not extend beyond the pedestrian barriers, fencing or traffic cones;</li> <li>The load of dusty materials on a vehicle leaving a construction site should be covered entirely by impervious sheeting to ensure that the dusty materials do not leak from the vehicle;</li> <li>Where practicable, vehicle washing facilities with high pressure water jet should be provided at every discernible or designated</li> </ul>	Good construction site practices to control the dust impact at the nearby sensitive receivers to within the relevant criteria.	Contractor	All construction sites	Construction stage	To control the dust impact to within the HKAQO and TM- EIA criteria (Ref. 1-hr and 24-hr TSP levels are 500µg/m <sup>3</sup> and 260µg/m <sup>3</sup> , respectively)

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
S5.5.6.2	A2	<ul> <li>the road section between the washing facilities and the exit point should be paved with concrete, bituminous materials or hardcores;</li> <li>When there are open excavation and reinstatement works, hoarding of not loss than 2 4m biob about the provided as far as practicable.</li> </ul>	Good construction	Contractor	All construction	Construction	To control the
55.5.6.2		<ul> <li>of not less than 2.4m high should be provided as far as practicable along the site boundary with provision for public crossing. Good site practice shall also be adopted by the Contractor to ensure the conditions of the hoardings are properly maintained throughout the construction period;</li> <li>The portion of any road leading only to construction site that is within 30m of a vehicle entrance or exit should be kept clear of dusty materials;</li> <li>Surfaces where any pneumatic or power-driven drilling, cutting, polishing or other mechanical breaking operation takes place should be sprayed with water or a dust suppression chemical continuously;</li> <li>Any area that involves demolition activities should be sprayed with water or a dust suppression chemical immediately prior to, during and immediately after the activities so as to maintain the entire surface wet;</li> <li>Where a scaffolding is erected around the perimeter of a building under construction, effective dust screens, sheeting or netting should be provided to enclose the scaffolding from the ground floor level of the building, or a canopy should be provided from the first floor level up to the highest level of the scaffolding;</li> <li>Any skip hoist for material transport should be totally enclosed by impervious sheeting;</li> <li>Every stock of more than 20 bags of cement or dry pulverised fuel ash (PFA) should be covered entirely by impervious sheeting or placed in an area sheltered on the top and the 3 sides;</li> </ul>	Good construction site practices to control the dust impact at the nearby sensitive receivers to within the relevant criteria.	Contractor	All construction sites	Construction stage	To control the dust impact to within the HKAQO and TM- EIA criteria (Ref. 1-hr and 24-hr TSP levels are 500µg/m <sup>3</sup> and 260µg/m <sup>3</sup> , respectively)

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
		<ul> <li>Cement or dry PFA delivered in bulk should be stored in a closed silo fitted with an audible high-level alarm which is interlocked with the material filling line and no overfilling is allowed;</li> <li>Loading, unloading, transfer, handling or storage of bulk cement or dry PFA should be carried out in a totally enclosed system or facility, and any vent or exhaust should be fitted with an effective fabric filter or equivalent air pollution control system; and</li> </ul>					
S5.5.6.2	A2	<ul> <li>Exposed earth should be properly treated by compaction, turfing, hydroseeding, vegetation planting or sealing with latex, vinyl, bitumen, shotcrete or other suitable surface stabiliser within six months after the last construction activity on the construction site or part of the construction site where the exposed earth lies.</li> </ul>	Good construction site practices to control the dust impact at the nearby sensitive receivers to within the relevant criteria.	Contractor	All construction sites	Construction stage	To control the dust impact to within the HKAQO and TM- EIA criteria (Ref. 1-hr and 24-hr TSP levels are 500µg/m <sup>3</sup> and 260µg/m <sup>3</sup> , respectively)
S5.5.6.3, Section 2.6 of FEP	A3	The Contractor should undertake proper watering on all exposed spoil (with at least 8 times per day) within the Project site and associated work area throughout the construction phase.	Control construction dust	Contractor	All construction sites	Construction stage	To control dust impact
S.5.5.6.4	A4	<ul> <li>AAHK to incorporate the controlled measures into the Particular Specification (PS) for the civil work. The PS should also draw the contractor's attention to the relevant latest Practice Notes issued by EPD.</li> </ul>	Control construction dust	PM / AAHK	All construction sites	Design stage	Air Pollution Control (Construction Dust) Regulation

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Construction	Noise (A	rborne)					
S6.4.10	N1	<ol> <li>Use of good site practices to limit noise emissions by considering the following:</li> <li>Only well-maintained plant should be operated on-site and plant should be serviced regularly during the construction programme;</li> <li>Machines and plant (such as trucks, cranes) that may be in intermittent use should be shut down between work periods or should be throttled down to a minimum;</li> <li>Plant known to emit noise strongly in one direction, where possible, be orientated so that the noise is directed away from nearby NSRs;</li> <li>Silencers or mufflers on construction equipment should be properly fitted and maintained during the construction works;</li> <li>Mobile plant should be sited as far away from NSRs as possible and practicable; and</li> <li>Material stockpiles, mobile container site officer and other</li> </ol>	Control airborne construction noise	Contractor	All construction sites	Construction stage	Noise Control Ordinance
		<ul> <li>Material stockpiles, mobile container site officer and other structures should be effectively utilised, where practicable, to screen noise from on-site construction activities.</li> </ul>					
S6.4.11	N2	<ol> <li>Install temporary hoarding located on the site boundaries between noisy construction activities and NSRs. The conditions of the hoardings shall be properly maintained throughout the construction period.</li> </ol>	Reduce noise impact to NSRs through partial screening	Contractor	All construction sites	Construction stage	Noise Control Ordinance; Annex 5, TM-EIA
\$6.4.12	N3	<ol> <li>Install movable noise barriers (typically density @14kg/m<sup>2</sup>), acoustic mat or full enclosure close to noisy plants including air compressor, generators, saw.</li> </ol>	Reduce noise emission by screening noisy plant	Contractor	All construction sites, for plant items listed in Appendix 6D of the EIA Report	Construction stage	Noise Control Ordinance; Annex 5, TM-EIA; Movable barriers should achieve at

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
							least 5dB(A) and full enclosure should be designed to achieve 10dB(A) reduction
S6.4.13	N4	<ol> <li>Select "Quiet plants" which comply with the BS 5228 Part 1 or TM standards.</li> </ol>	Reduce noise levels of plant items	Contractor	All construction sites, for plant items listed in Appendix 6D of the EIA Report	Construction stage	Noise Control Ordinance; Annex 5, TM-EIA
S6.4.14	N5	5) Sequencing operation of construction plants where practicable.	Control construction noise by operating sequentially within the work site	Contractor	All construction sites	Construction stage	Noise Control Ordinance; Annex 5, TM-EIA

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Sediment							
		Marine sediments excavated are to be treated using cement/solidification/stabilization techniques and tested against TCLP which were recommended in the EPD's Practice Guide for Investigation and Remediation of Contaminated Land. Properly treated marine sediment is to be reused onsite or offsite for backfilling and/or landscaping such that the need for offsite disposal is avoided as far as practicable.	Develop marine sediment treatment and reuse arrangement	Contractor	All construction sites	Construction stage	Universal Treatment Standards for On-site Reuse of Cement Stabilisation/Solid ification Treated Soil as shown in the Practice Guide for Investigation and Remediation of Contamination Land issued by EPD

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Waste Manag	gement (C	onstruction Waste)					
S8.3.8	WM1	<ul> <li>Construction and Demolition (C&amp;D) Material</li> <li>The following mitigation measures should be implemented in handling the waste:</li> <li>Maintain temporary stockpiles and reuse excavated fill material for backfilling and reinstatement;</li> <li>Carry out on-site sorting;</li> <li>Make provisions in the Contract documents to allow and promote the use of recycled aggregates where appropriate;</li> <li>Adopt 'Selective Demolition' technique to demolish the existing structures and facilities with a view to recovering broken concrete effectively for recycling purpose, where possible;</li> <li>Implement a trip-ticket system for each works contract to ensure that the disposal of C&amp;D materials is properly documented and verified;</li> <li>Implement an enhanced Waste Management Plan similar to ETWBTC (Works) No. 19/2005 – "Environmental Management on Construction Sites" to encourage on-site sorting of C&amp;D materials and to minimize their generation during the course of construction; and</li> <li>Disposal of the C&amp;D materials onto any sensitive locations such as agricultural lands, etc. should be avoided. The Contractor shall propose the final disposal sites to the Project Proponent and get its approval before implementation.</li> </ul>	Good site practice to minimize the waste generation and recycle the C&D materials as far as practicable to reduce the amount for final disposal	Contractor	All construction sites	Construction stage	Land (Miscellaneous Provisions) Ordinance; Waste Disposal Ordinance; ETWB TC 19/2005

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
S8.3.9 - S8.3.11	WM2	<ul> <li><u>C&amp;D Waste</u></li> <li>Standard formwork or pre-fabrication should be used as far as practicable in order to minimise the arising of C&amp;D materials. The use of more durable formwork or plastic facing for the construction works should be considered. Use of wooden hoardings should not be used, as in other projects. Metal hoarding should be used to enhance the possibility of recycling. The purchasing of construction materials will be carefully planned in order to avoid over ordering and wastage; and</li> <li>The Contractor should recycle as much of the C&amp;D materials as possible on-site. Public fill and C&amp;D waste should be segregated and stored in different containers or skips to enhance reuse or recycling of materials and their proper disposal. Where practicable, concrete and masonry can be crushed and used as fill. Steel reinforcement bar can be used by scrap steel mills. Different areas of the sites should be considered for such stores and storage.</li> </ul>	Good site practice to minimize the waste generation and recycle the C&D materials as far as practicable to reduce the amount for final disposal	Contractor	All construction sites	Construction stage	Land (Miscellaneous Provisions) Ordinance; Waste Disposal Ordinance; ETWB TC 19/2005
S8.2.12 - S8.3.15	WM3	<ul> <li><u>Chemical Waste</u></li> <li>Chemical waste that is produced, as defined by Schedule 1 of the Waste Disposal (Chemical Waste) (General) Regulation, should be handled in accordance with the Code of Practice on the Packaging, Labelling and Storage of Chemical Wastes;</li> <li>Containers used for the storage of chemical wastes should be suitable for the substance they are holding, resistant to corrosion, maintained in a good condition, and securely closed; have a capacity of less than 450 liters unless the specification has been approved by the EPD; and display a label in English and Chinese in accordance with instructions prescribed in Schedule 2 of the regulation;</li> <li>The storage area for chemical wastes should be clearly labelled and used solely for the storage of chemical waste; enclosed on at least 3 sides; have an impermeable floor and bunding of sufficient capacity to accommodate 110% of the volume of the largest container or 20 % of the total volume of waste stored in that area, whichever is the greatest; have adequate ventilation; covered to</li> </ul>	Control chemical waste and ensure proper storage, handling, and disposal	Contractor	All construction sites	Construction stage	Waste Disposal (Chemical Waste) (General) Regulation; Code of Practice on the Packaging, Labelling and Storage of Chemical Waste

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
		prevent rainfall entering; and arranged so that incompatible materials are adequately separated; and					
\$8.2.12 - \$8.3.15	WM3	<ul> <li>Disposal of chemical waste should be via a licensed waste collector; be to a facility licensed to receive chemical waste, such as the Chemical Waste Treatment Centre which also offers a chemical waste collection service and can supply the necessary storage containers; or be to a reuser of the waste, under approval from the EPD.</li> </ul>	Control chemical waste and ensure proper storage, handling, and disposal	Contractor	All construction sites	Construction stage	Waste Disposal (Chemical Waste) (General) Regulation;
							Code of Practice on the Packaging, Labelling and Storage of Chemical Waste
S8.3.16	WM4	<ul> <li><u>Sewage</u></li> <li>Adequate numbers of portable toilets should be provided for the workers. The portable toilets should be maintained in a state, which will not deter the workers from utilizing these portable toilets. Night soil should be collected by licensed collectors regularly.</li> </ul>	Proper handling of sewage from worker to avoid odour, pest, and litter impacts	Contractor	All construction sites	Construction stage	Waste Disposal Ordinance
S8.3.17	WM5	<ul> <li>General Refuse</li> <li>General refuse generated on-site should be stored in enclosed bins or compaction units separately from construction and chemical wastes;</li> <li>A reputable waste collector should be employed by the Contractor to remove general refuse from the site, separately from construction and chemical wastes, on a daily basis to minimize odour, pest and litter impacts. Burning of refuse on construction sites is prohibited by law;</li> </ul>	Minimise production of general refuse and avoid odour, pest, and litter impacts	Contractor	All construction sites	Construction stage	Waste Disposal Ordinance
		<ul> <li>Aluminium cans are often recovered from the waste stream by individual collectors if they are segregated and made easily</li> </ul>					

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
		<ul> <li>accessible. Separate labelled bins for their deposit should be provided if feasible;</li> <li>Office wastes can be reduced through the recycling of paper if volumes are large enough to warrant collection. Participation in a local collection scheme should be considered by the Contractor. In addition, waste separation facilities for paper, aluminium cans, plastic bottles etc., should be provided; and</li> </ul>					
		<ul> <li>Training should be provided to workers about the concepts of site cleanliness and appropriate waste management procedure, including reduction, reuse and recycling of wastes.</li> </ul>					

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Water Quality	(Constru	ction Phase)					
S9.11.1.3	W2	<ol> <li>General construction activities should be governed by standard good working practice. Specific measures to be written into the works contracts should include:</li> </ol>	Control construction water quality impact	Contractor	All construction sites	Construction stage	TM-EIAO
		Wastewater from temporary site facilities should be controlled to prevent direct discharge to surface or marine waters;					
		<ul> <li>Sewage effluent and discharges from on-site kitchen facilities shall be directed to Government sewer in accordance with the requirements of the WPCO or collected for disposal offsite. The use of soakaways shall be avoided;</li> </ul>					
		• Storm drainage shall be directed to storm drains via adequately designed sand/silt removal facilities such as sand traps, silt traps and sediment basins. Channels, earth bunds or sand bag barriers should be provided on site to properly direct stormwater to such silt removal facilities. Catchpits and perimeter channels should be constructed in advance of site formation works and earthworks;					
		• Silt removal facilities, channels and manholes shall be maintained, and any deposited silt and grit shall be removed regularly, including specifically at the onset of and after each rainstorm;					
		<ul> <li>Temporary access roads should be surfaced with crushed stone or gravel;</li> </ul>					
		<ul> <li>Rainwater pumped out from trenches or foundation excavations should be discharged into storm drains via silt removal facilities;</li> </ul>					
		<ul> <li>Measures should be taken to prevent the washout of construction materials, soil, silt or debris into any drainage system;</li> </ul>					

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
S9.11.1.7	W1	<ul> <li>Open stockpiles of construction materials (e.g. aggregates and sand) on site should be covered with tarpaulin or similar fabric during rainstorms;</li> <li>Manholes (including any newly constructed ones) should always be adequately covered and temporarily sealed so as to prevent silt, construction materials or debris from getting into the drainage system, and to prevent storm run-off from getting into foul sewers;</li> <li>Discharges of surface run-off into foul sewers must always be prevented in order not to unduly overload the foul sewerage system</li> <li>All vehicles and plant should be cleaned before they leave the construction site to ensure that no earth, mud or debris is deposited by them on roads. A wheel washing bay should be provided at every site exit;</li> <li>Wheel wash overflow shall be directed to silt removal facilities before being discharged to the storm drain;</li> <li>The section of construction road between the wheel washing bay and the public road should be surfaced with crushed stone or coarse gravel;</li> <li>Wastewater generated from concreting, plastering, internal decoration, cleaning work and other similar activities, shall be screened to remove large objects;</li> <li>Vehicle and plant servicing areas, vehicle wash bays and lubrication facilities shall be located under roofed areas. The drainage in these covered areas shall be connected to foul sewers via a petrol interceptor in accordance with the requirements of the WPCO or collected for offsite disposal;</li> </ul>	Control construction water quality impact	Contractor	All construction sites	Construction stage	TM-EIAO

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
		<ul> <li>The Contractor shall prepare an oil / chemical cleanup plan and ensure that leakages or spillages are contained and cleaned up immediately;</li> <li>Waste oil should be collected and stored for recycling or disposal, in accordance with the Waste Disposal Ordinance;</li> <li>All fuel tanks and chemical storage areas should be provided with locks and be sited on sealed areas. The storage areas should be surrounded by bunds with a capacity equal to 110% of the storage capacity of the largest tank; and</li> <li>Surface run-off from bunded areas should pass through oil/grease traps prior to discharge to the stormwater system.</li> </ul>					
Landscape a	Landscape and Visual (Detailed Design Phase)						
S14.3.3.2	LV1	<ul> <li>General design measures include:</li> <li>Protection measures for the trees to be retained during construction activities;</li> <li>Optimizing the sizes and spacing of the bridge columns;</li> <li>Fine-tuning the location of the bridge columns to avoid visually-sensitive locations; and</li> <li>Maximizing new tree, shrub and other vegetation planting to compensate tree felled and vegetation removed.</li> </ul>	Minimise landscape and visual impact	Detailed designer	All construction sites	Design stage	-

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve	
Landscape a	nd Visual	(Construction Phase)						
S14.3.3.3	LV2	Mitigate both landscape and visual impacts:		1	1	1	1	
		G1. Grass-hydroseed bare soil surface and stockpile areas.	Minimise landscape and visual impact	Contractor	All construction sites	Construction stage	-	
		G2. Add planting strip and automatic irrigation system if appropriate at some portions of bridge or footbridge to screen bridge and traffic.	New planting strip and automatic irrigation system will not be added under this Project. Instead, existing irrigation system would be reinstated after the construction works if necessary.					
		G11. All existing trees shall be carefully protected during construction. <sup>(1)</sup>	Minimise landscape and visual impact	Contractor	All construction sites	Construction stage	Contract specification	
S14.3.3.3	LV3	Mitigate visual impacts:	Minimise visual impact	Contractor	All construction sites	Construction stage	-	
		V1. Minimise time for construction activities during construction period.						
		V2. Provide screen hoarding at the portion of the project site/ works areas/ storage areas near VSRs who have close low-level views to the Project during construction.						
Landscape a	nd Visual	(Operation Phase)						
S14.3.3.3	LV4	Mitigate both landscape and visual impacts:	Minimise landscape and visual impact	HyD	All construction sites	Operation stage	-	
		G10. Provide proper planting maintenance on the new planting areas to enhance the aesthetic degree.						
	LV5	Mitigate visual impacts:	Minimise visual impact	HyD	All construction sites	Operation stage	-	
		V3. Lighting design to minimize glare at night. Decorative road lighting to be considered during detailed design stage. <sup>(2)</sup>						

Environmental Monitoring and Audit Manual

EIA Ref. (Register No. AEIAR- 145/2009)	EM&A Log Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measures & Main Concerns to Address	Agent to Implement	Location	Time to Implement	Requirements or Standards for the Measures to Achieve
Environment	al Monito	ring and Audit		<u>.</u>		•	
S15.2.2	EM1	An Independent Environmental Checker shall be employed as per the EM&A Manual.	Control EM&A performance	ААНК	All construction sites	Construction stage	EIAO Guidance Note No. 4/2002; TM-EIAO
S15.5 -	EM2	<ul> <li>An Environmental Team shall be employed as per the EM&amp;A Manual.</li> <li>A systematic Environmental Management Plan shall be prepared to</li> </ul>	Perform EM&A	ААНК	All construction sites	Construction stage	EIAO Guidance Note No. 4/2002; TM-EIAO
S15.6		<ul> <li>ensure effective implementation of the mitigation measures.</li> <li>Environmental impact monitoring shall be implemented by the Environmental Team to ensure all requirements stipulated in the EM&amp;A Manual are fully complied.</li> </ul>					

Notes:

(1) Tree protection zone shall be provided by AAHK's contractor.

(2) Decorative road lighting is not applicable to the Project. However, to minimize glare at night and avoid any unnecessary light spill to nearby VSRs (e.g. those on Airport Island and residents at Tung Chung and north Lantau), only minimum functional lighting will be provided for safety and all directional lighting will be facing towards, instead of away from, the Project Site.