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23 April 2015

Dear Ms. Wong,

**Comments on Comprehensive Development and Wetland Protection near Yau Mei
San Tsuen – Environmental Impact Assessment (EIA)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns on the captioned project. Our concerns are stated below:

1. Adverse impact on flight lines between Ngau Tam Mei Drainage Channel (NTMDC) and the Deep Bay area

From the findings of the flight line survey¹, flight lines 1, 3 and 4 are routes crossing the Assessment/Project Area, and they account for 61.7% of the total birds observed. Flight Lines 3 and 4 are at/close to the Project Site and they account for 40.1% of the total birds observed². These findings indicate that the ecological corridor, which is located between the Ngau Tam Mei Drainage Channel (NTMDC) and the wider Deep Bay area via the Project site and its immediate surroundings, is significant for wetland-dependent birds. Currently, the Project Site and its immediate surroundings consist of dry agricultural fields, grassland, shrubland and ponds. They form a continual natural vegetated area which provides an ecological corridor for the movement of birds and other wildlife.

We would like to point out that the “Recreation” (REC) zone adjacent to the Project Site, which is currently un-developed and still vegetated, should not be relied on to form a part of the proposed “ecological corridor”. The general planning intention of an REC zone is not for conservation and many permitted/maybe permitted uses would introduce more human disturbance into the area (e.g., barbecue spot, holiday camp, cable car route and terminal building). The ecological corridor

¹ Section 8.7.2.3 of the EIA

² Calculated from the data provided in Table 8-5 of the EIA



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proposed by the Project Proponent is about 9 to 19 metres³. We consider that such proposal is not effective to mitigate the impact of the development on the flight line of birds, and we are concerned that these routes will eventually be abandoned by the avifauna.

2. Out-of-date ecological data and adverse impacts on Black-faced Spoonbill

The ecological surveys of this Project were conducted in 2007 and 2008. Although site visits were made to confirm the habitats within the Project Site was unchanged, the condition of its surroundings has changed. The NTMDC is now under tidal influence and has attracted more birds to utilize the area. According our observation, there is an increase in the observation of Black-faced Spoonbill in the Ngau Tam Mei Channel for the past few years. It is listed as “Endangered” under the IUCN Red List, “Endangered” in the China Red Data Book, of “Potential Global Concern” in Fellowes et al. (2002), and is protected under the Wild Animals Protection Ordinance Cap. 170. Groups of 10 to 15 Black-faced Spoonbill individuals, and up to a maximum of 33 individuals, were observed in NTMDC during Jan 2014 to March 2015. This Globally Endangered species may also utilize the aforementioned ecological corridor to/from the NTMDC and the Deep Bay area.

We consider the data compiled in this EIA report cannot fully reflect the ecological condition of the Project Site and its surroundings. Therefore, the Project Proponent should provide up-to-date ecological information, particularly on the Black-faced Spoonbill, in order to adequately assess the impact of the proposed development.

The HKBWS is concerned that the proposed development would threaten the ecological integrity of the wider Deep Bay wetland ecosystem, and respectfully requests the Environmental Protection Department to consider our comments above.

Yours sincerely,



Woo Ming Chuan
Conservation Officer
Hong Kong Bird Watching Society

³ Section 2.9 of the EIA



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