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The Conservancy Association

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25th May 2011

Ms. Wong Sean Yee, Anissa

Director of Environmental Protection

Environmental Protection Department

Environmental Impact Assessment Ordinance Register Office

By Fax: 2147 0894

Dear Ms. Wong

RE: Comments on The Baroque on Lamma Project Profile

The Conservancy Association (CA) would like to submit comments on project profile regarding The Baroque on Lamma Project Profile. This project should be strongly objected with reference to such large scale of development. Building 900 residential units together with hotel and other marina facilities under plot ratio of 0.5 in an ecologically sensitive area with high scenic beauty should not be considered with respect to the ever increasing demand on environmental conservation and countryside preservation from the public.

Green Turtle

Strong scientific evidences are required in assessing the impact of artificial lightings on nesting green turtles. Some tracking research has indicated that green turtles often utilize coastal areas during migration between nesting and foraging grounds¹, while evidence of foraging in inter-nesting areas might also be expected on some individuals². The proposed hotel development within 200m of the nesting site on Lamma would still pose great threats on green turtles.

¹ Song X, Wang H, Wang W, Gu H, Chan SKF, Jiang H (2002) Satellite tracking of post-nesting movements of green turtles, *Chelonia mydas*, from Gangkou Sea Turtle National Nature Reserve, China, 2001. *Marine Turtle Newsletter* 97: 8-9

² Tucker, A.D., Read, M.A., 2001. Frequency of foraging by gravid green turtles (*Chelonia mydas*) at Raine Island, Great Barrier Reef. *Journal of Herpetology* 35, 500-503.

Romer's Tree Frog

Another species of significant conservation concern that is known to occur in the proposed development site is the Romer's Tree Frog (*Liuixalus romeri*). It is endemic to Hong Kong and listed as endangered in the IUCN Red List of Threatened Species³. This species occurs widely on Lamma and would likely occur widely in forested areas of the proposed development site. Some woodlands are subject to clearance for the proposed development which may be important habitats for this frog species⁴. Even AFCD has reminded that “*Most of the Romer's Tree Frog sites on Lamma Island fall within "Conservation Area" on the Lamma Island Outline Zoning Plan*”⁵. As most of the secondary woodland and shrubland zoned as Conservation Area in the Lamma Island OZP are within the proposed residential blocks and hotels, the proposed project would post severe threats to Romer's Tree Frog.

Marine Ecology

It should be highly alerted that the scale of the marina at the northern site and the pier in southern site would be large and cause disturbance on marine environment both before and after construction phase. Past research conducted by the Civil Engineering Department have once mentioned that hard coral communities of high conservation value could be identified in southern Lamma, particularly Sham Wan and Tung O Wan⁶. Besides, finless porpoise could be sighted in water area within or near Tung O Wan, especially in spring⁷. Provision of 500 berths in marina together with other tourist facilities would further increase traffic flow in the area. CA cannot see how disturbance on marine environment could be mitigated under such huge development scale.

Yours sincerely,

Ng Hei Man
Senior Campaign Officer

³ Michael Wai Neng Lau, Zhao Ermi 2004. *Liuixalus romeri*. In: IUCN 2010. IUCN Red List of Threatened Species. Version 2010.4. <www.iucnredlist.org>. Downloaded on **23 May 2011**.

⁴ Lau, M. W. N. and D. Dudgeon (1999) Composition and distribution of Hong Kong Amphibian fauna. *Memoirs of the Hong Kong Natural History Society* 22: 1-80.

⁵ AFCD (2006). Conservation. *Romer's Tree Frog*.
http://www.afcd.gov.hk/english/conservation/con_fau/con_fau_rom/con_fau_rom_con/con_fau_rom_con.html

⁶ Binnie Consultants Limited (1995). Fill Management Study- Phase IV: Investigation and development of marine burrow areas: Marine ecology of Hong Kong / Report on underwater dive surveys (Oct. 1991 - Nov. 1994), Vol. 1-2. Report to Civil Engineering Department, Geotechnical Engineering Office.

⁷ ERM (2009). Distribution of Finless Porpoise Sightings Recorded in Lamma Survey Area from AFCD Monitoring Surveys (light blue dots) and during the Wind Farm Surveys (dark blue dots) from December 2008 to May 2009.
http://www.epd.gov.hk/eia/register/report/eiareport/eia_1772009/HTML%20version/EIA%20Report/Figures/Fig9A.21.pdf