



EagleOwl On Lantau

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12 April 2006

**Attention: - Becky Yu Panel of
Environmental Affairs**

Dear Becky,

I was a member of the Sustainable Advisory Board for the Tung Chung Cable Car Project.

However I resigned on March 13, 2006 because I became disillusioned over the period I was on the board. We were misinformed over a number of critical environmental issues. I was extremely disappointed with the unprofessionalism and scant regard shown by the MTRC for safeguarding this very special ecological sensitive area.

In my submission I have concentrated on the matter of Hill fires along the Cable Car route.

Regards,

Paul Melsom

**Hill Fire Extracts taken from Tung
Chung Cable Car Project**

**Comments by Paul Melsom of EagleOwl On
Lantau**

(N.B. The print in **Black** are extracts from the EIA and the print in *Italic* are my comments.)

MTR Corporation Ltd
Tung Chung Cable Car Project
Environmental Impact Assessment (Final)
 Document No. 203842/01/A
March 2003

Initial comments

Please see the Photo and Vegetation Map in the EIA report which will give an overview and the potential danger for Hill Fires in this area.

1/ This photo taken in the dry season clearly shows the dangerous dry conditions and a hill fire could easily start here spreading very quickly in windy conditions

Figure 8.24 Photomontage sheet 6 of 7. Nei Lak Shan Summit

[http://www.epd.gov.hk/eia/register/report/eiareport/eia_0902003/Figuresrev1/Figure8_24\(SHEET6%20OF%207\).PDF](http://www.epd.gov.hk/eia/register/report/eiareport/eia_0902003/Figuresrev1/Figure8_24(SHEET6%20OF%207).PDF)

2/Comments on Vegetation types on EIA Habitat Map.

This web address is a habitat map found in the EIA. Figure 7.5

http://www.epd.gov.hk/eia/register/report/eiareport/eia_0902003/Figuresrev1/FIG-7-5.PDF

(The flora habitat zones shown on this map do not give a clear picture showing shrubs and high shrub areas. In reality these shrub area contain high percentages of combustible grass and ferns which fill in these areas. In fact these habitat zonal maps give a distorted impression of the vegetation zones excluding the grasses and ferns. They should be called Shrub grassland etc.)

Hill Fires

7.8.4 Disturbance

(v) Fire Regime

A number of tower sites are located within areas that are prone to hill fires. However, it has been noted that only one or two hill fires have been recorded in this area within the last 10 years.

Within the Study Area smoking, cooking, use of machinery and the use of stoves during the construction period may accidentally cause hill fires. It should be noted that it is prohibited to carry a lantern, cooking stove and or to discard any match, lighted cigarette in a manner likely to cause a fire in Country Parks. The regular burning of vegetation hinders natural succession of the vegetation from grassland, through to shrub land and woodland. The natural climax vegetation in the SAR is woodland but much of the vegetation remains as grassland due to regular burning.

No evidence is present to suggest that the fire frequency and intensity will increase. Mitigation measures during construction will minimise the risk of accidental hill fire.

Quote 'A number of tower sites are located within areas that are prone to hill fires' this sentence states that there is a problem.

Evidence is that 1 or 2 hill fires have occurred in this area in the last 10 years.

1 or 2 hill fires in this area indicates there is a problem especially with the increase of probably less environmentally aware tourists coming to the Cable Car. At present it can be assumed that there are probably more knowledgeable caring hikers taking the hikes.

Over the last few years large Hill fires have recently occurred on Sunset peak at similar elevations.

Also there have been numerous hill fires around the Tung Chung area in recent years.

There was a very big hill fire between Disneyland and Discovery bay in Nov 2004 which was estimated to be 5.2sq km.

Hill fires do not occur in the same area very year as it takes time for the regeneration of grass to build up enough combustible material to cause a fire.

The longer there has been no hill fires in the area means there has been a greater time for combustible grass and fern to grow and increase the risk of hill fires.

Fires in these remote areas are very difficult to get to and can grow to a large size before being brought under control.

7.9.6 Hill Fires

No systematic observations on firebreak effectiveness have been made in Hong Kong (Porcupine, 2002). Also, the clearing of more dense vegetation (such as tall shrub and woodland) may assist in the spread of fire, as grassland habitats are the most frequently burnt habitats in Hong Kong (Lawrence, 1994), which is supported by visual observations of previous hill fires in the Study Area during field investigations. Ecological impacts from the construction and operation of a 30m wide firebreak will result in significant and unacceptable impacts that cannot be mitigated. However, a 30m wide firebreak is not required for the Project. The increase in the occurrence of fire as a result of the Project is unlikely but has been taken into consideration in the impact mitigation as precautionary measures.

This is a very weak response to the real danger of fire in this ecological sensitive area. It indicates that no real attempt has been made to protect the area by looking into selective cutting of fire breaks in dry grass areas, by cutting combustible dry grass and ferns either side of the rescue trail in these fire prone areas.

Selectively clearing the dry grass and ferns either side of the emergency walkway and by planting these areas with native shrubs and small trees will reduce the risk of hill fires. The landscaping should be done in such away that it naturally blends in with the area using native flora species already found here. Planting with indigenous native shrubs and trees found in the area will displace the combustible grass and ferns for green leafed non combustible plants.

Selectively cutting fire breaks under the Cable Car by only removing dry grass and ferns should be looked into. Planting shrubs and trees in these areas will help stop erosion and green the area up and prevent hill fires.

7.11.1 Ecological Mitigation during Construction Phase and Conservation Strategies

(iv) Prevention of Hill Fires

MTRC's Contractor shall propose a Fire Prevention Strategy in the Method Statement to the approval of the Engineer for all works within the Country Park. The strategy will be developed prior to operation in conjunction with relevant Government authorities. This strategy will aim to protect sensitive plant communities within the site and it will also consider the needs of significant fauna species.

The Fire Prevention Strategy will include measures to prevent hill fires including no smoking; cooking or use of open fires on any site; no cigarette lighters or matches shall be carried onto the site in connection with the Tung Chung Cable Car Project. Welding or hot work is also not permitted and temporary fire fighting equipment shall be provided in all work areas.

MTRC's Contractor shall propose a Fire Prevention Strategy in the Method Statement to the approval of the Engineer for all works within the Country Park. Was this ever done properly?

No fire beaters were supplied until very late in the project. And only 20 fire beaters were supplied eventually but there needs to be photographic evidence to indicate at least they are there.

I would suggest at least a dozen fire racks with 6 fire beaters per rack should be installed along the Cable Car rescue trail. Also danger fire indicators and no smoking signs should be erected at either end of the trail.

On the three times I walked sections of the emergency trail in the Ngong Ping area I saw numerous cigarette ends. I was also witness to 3 contractors smoking whilst working on the theme village. If the MTRC can not control its own workers, how then can it control the public from smoking in the Cable Car and on the Emergency trail which will make a Hill Fire a sure inevitability at sometime in the future?

7.9.7 Summary of Operational Phase Impacts

A summary of operation phase unmitigated impacts are provided in Table 7.28 below.

Table 7.28 Summary of Operation Phase Impacts

| General Impact | Specific Impact | Severity | Mitigation Required |
|--|--|-----------------|----------------------------|
| Disturbance | Disturbance from the noise and movement of the Cable Car includes associated noise impacts and pollution emissions, particularly the potential impact on water quality from sedimentation and erosion. | Insignificant | No. |
| Barrier effects | Effect of the construction of the Emergency Rescue Trail and the subsequent impact on ground dwelling species. | Insignificant. | No. |
| Bird mortality due to impact with structures | Mortality incurred by avifauna as a consequence of collisions with Cable Cars. | Insignificant. | No. |
| Birds nesting on towers | Beneficial impact on birds from the provision of perching and nesting sites | Insignificant. | No. |
| Increased number of visitors | Increased litter and waste and impacts from trampling of grass and shrub species in the Country Park (including taking of Orchid flowers etc). | Minor. | Yes. |
| Hill fires | No impact. | Insignificant. | No. |

| General Impact | Specific Impact | Severity | Mitigation Required |
|----------------|-----------------|----------|---------------------|
| | | | |

Increased numbers of visitors

Will cause a higher risk of hill fires from increased visitors cigarette butts dropped on the side of the trails. Also cigarette butts dropped from the cable car windows themselves.

Hill fires

This states that Hill fires have ‘No impact’ and are ‘insignificant’ but this is couldn’t be further from the truth.

Fires are always possible in the dry season on Lantau and there are indeed many hill fires which start on remote areas and not just in grave sites during Ching Ming. Much of the area under the Cable Car is easily combustible dry grass and ferns. This can easily catch light and spread quickly in dry windy conditions.

*This area is regenerating from Hill fires in the past. Hill fires will cause this area to be destroyed irrecoverable and flora like the beautiful protected plants **Enkianthus quinqueflorus** are under unnecessary threat of fire.*

Notes.

*The **Cable Car in Ocean Park** travels over green shrubs and trees and no combustible dry grass or ferns.*

*The **Ngong Ping 360 Cable Car** travels over large areas of dry grass and ferns. Additionally due to the exposed hilly sites which the cable car covers winds could fan the flames and the hill fires could spread very quickly*

Conclusion.

*It is **unacceptable that no fire prevention methods have been put** in place to stop fires from happening.*

*This **area is too precious with the flora and fauna it contains** to take any risk to and every possible precaution must be taken to prevent hill fires.*

*The **EIA fails enormously to formulate any protection measures** for this area against hill fires.*

Hill fires are likely to come from two sources.

1/ Discarded cigarettes from the cable car windows.

2/ Discarded cigarettes along the emergency rescue trail.

Cable Cars

The eight windows in the cable car are easy to reach and easily to open.

Cigarettes cans easily be dropped from cable car cabins on to the dry grass areas onto Country Park.

Non-environmentally aware smoking tourists from other countries are probably a great risk and may not understand that hill fires can easily start when cigarette ends drop into dry grass which are fanned by winds. With more than a million tourists expected in the first year there is a high probability of people smoking in the cable cars. Many people disregard laws and notices all the time. It is extremely naive of the MTR to insist that no one out of the million plus projected passengers will not smoke on the cable car especially when the passengers are out of sight.

People will drop the cigarette ends out of the windows instead of stubbing them out on the floor, as they won't want to be caught.

The cable cars are far from the view of anyone and it is impossible to see if anyone is smoking in these cars. This is a totally different situation from the MTR trains which are filled with people and have CCTV.

Meshes should be fitted to the windows of the Cable Cars to stop cigarette butts being discarded onto the highly combustible dry grass and ferns below.

People can easily stand on the seats too and smoke leaning out the windows potentially dropping there cigarette end onto the grass below.

There is a need to look at a separate fire break in the grass/mixed grass, shrub and fern areas.

The AFCD cuts firebreaks in its Country Park areas. If contractors for the cutting of the firebreaks then they will need to be advised about selectively cutting the firebreak and not to damage any trees or shrubs.

Emergency Rescue Trail

Removing a few metres of grass and ferns either side of the path will make one effective firebreak. This will also take away potential combustible material away directly from the path so if a lighted cigarette or match is discarded off the path it will not ignite the grass/ferns.

It is also unacceptable that only 20 Fire beaters have been spread thinly along the whole length of the emergency trail.

Summary.

Fire prevention methods need to be in place by the end of August 2006.

1/Meshes should be fixed over the Cable Car windows.

2/The emergency rescue trail should be used as firebreak and widened by cutting only the dry grass and ferns. This will also reduce fire risk from discarded cigarettes.

3/A second firebreak needs to be seriously considered the other side of the Emergency trail.

4/Many more fire beaters need to be installed in easily to find Fire beater racks.

5/ Ngong Ping Terminal to Nei Lak Shan is a high risk for potential hill fire due to the dry grass as well as other areas along the trail

Additional notes: Replanting with green native shrubs and trees will enhance the area by improving the habitat, regenerating the area, stop long term erosion, make it more beautiful and provide long term prevention of fires.

PHOTO INFORMATION SUBMITTED

Photos enclosed indicating Ngong Ping area propensity to fire and two examples of recent large Hillfires on Suneset peak and between Discovery bay and Disney Land.

1/ Pic No. 1000012 Sunset Peak Fire Jan 2004 approx elevation 600metres.

2/ Pic No. 1000027 Sunset Peak Fire Jan 2004 approx elevation 600metres.

3/ Pic No.10200038 Discovery bay to DisneyLand Hill Fire 5 SqKm in area Nov 2004.





