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SAVE International

(Spoonbill Action Voluntary Echo)

A Project of Earth Island Institute

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August 22, 2016

Premier LIN Chuan, Taiwan Executive Yuan
No. 1, Sec. 1, Zhongxiao E. Rd., Taipei 10058, Taiwan
Sent via email through <https://eyemail.ey.gov.tw/en/MailToPremier.aspx>

Subject: Jiading Wetland, redesignation to "Wetland of National Importance"

Dear Premier Lin:

On behalf of SAVE International, I am writing to ask the office of Taiwan's Executive Yuan to reverse the determination by Kaohsiung City that Jiading Wetland should remain designated as a wetland of only "local importance", not national or international. Kaohsiung has consistently made environmental assessments about Jiading Wetland based on political influence rather than scientific information – from its early environmental documentation of a proposed road (Road 1-4), to this most recent determination. In fact, the court has determined that the environmental review process of the road was flawed. If this assessment had been done with any rigor, Jiading Wetland would have been reclassified at a minimum to the level of national importance, using the terms of Taiwan's Wetland Conservation Act.

It is inconceivable that Jiading Wetland continue to have a local-only wetland designation. Its seasonal shallow waters, wetland vegetation, and roosting and foraging areas offer ideal wetland habitat for over 100 bird species. This site supports biodiversity and ecological function at levels that qualify it for protection under the International Ramsar Convention on Wetlands: any site supporting more than 1% of the population of a species is considered a "wetland of international importance". In 2016, Jiading was the winter home to 4% of the global population and 6% of Taiwan's population of the endangered Black-faced Spoonbill (*Platalea minor*) – an honor that has held true for several years.

Further, SAVE rejects the proposed new boundary for Jiading Wetland. Like many wetlands of international importance, Jiading has been modified over time, but to carve it up into five pieces (including Road 1-1 and the proposed Road 1-4) does not acknowledge that a significant portion of the population of the Black-faced Spoonbill now depends upon the entire wetland (north and south of Road 1-1) for foraging and roosting. The road cuts through the heart of the spoonbill's roosting area. The best available conservation biology shows that a new road in this area would fragment the habitat and would violate the flight-initiation distance for roosting birds.

SAVE knows these things because we prepared a detailed analysis of Jiading Wetland in 2014, in conjunction with scientists and environmental planners from the University of California, Berkeley and National Cheng Kung University, and local organizations from the Jiading area and Kaohsiung. The resulting report documents its environmental assets and challenges as well as proposes land-use-based plans for the future (see https://savespoonbills.files.wordpress.com/2014/07/jiading-final-report-june-2014_tw_po-hsiu.pdf). During the debate over Road 1-4, SAVE contributed considerable documentation, both in writing and spoken testimony, because we believe that the road would seriously harm the endangered Black-faced Spoonbill, the wetland ecosystem, and the local economy.

Jiading Wetland is only one site in Taiwan for which SAVE has presented scientific studies and plans before the central and local governments. We were founded in 1997 to evaluate the impact of the proposed Bin-nan petrochemical complex, and subsequently to develop an alternative plan that saved thousands of jobs in fishing and created a new tourism economy for Yunlin, Chiayi, and Tainan Counties. We continue to conduct research on spoonbill habitat, promote alternative development, and collaborate with local groups to develop sustainable plans that protect spoonbills. Thanks to the partnership of many people around the world -- in particular the leadership of Taiwan's national government -- spoonbill numbers are increasing. These efforts have brought Taiwan well-deserved international recognition. SAVE believes that just like Chiku Lagoon in the 1990s, Jiading Wetland could provide enormous economic advantages for the local and regional economy.

We consider the above to be obvious arguments for reclassifying the wetland, and we have been repeating them for years. But there are more. If the politicians of Kaohsiung City looked more closely at what has been happening in Jiading in the past two years, they would realize that sustainable ecotourism is already taking hold, using the ideas that SAVE and others have proposed. For example, a coffee shop owner who attended the EIA public meetings in 2014 converted her business to an ecotourism bed and breakfast. National Pingtung University developed a cultural and ecotourism map, which is being widely distributed. The number of birdwatching tourists to the wetland continues to increase.

Even more significantly, and at the heart of the aspirations of the Wetlands Conservation Act, Jiading Wetland has become a training ground for a new generation of scientists and informed citizens. Local non-governmental organizations (NGOs) consistently hold events at the wetland, from local history tours to wetland clean-ups. The vision for the wetland spawned a local youth-based NGO, Jiading Wetland Youth. Among its other activities, this group hosted an activism training workshop in 2015 that included students from multiple Taiwanese universities and from Tokyo Institute of Technology.

To conclude, we ask that your office reverse the local government determination that Jiading Wetland remain a local-level wetland, and ensure that the wetland be reclassified as a wetland of at least national importance, or even a wetland of international importance. Thank you for your consideration.

Respectfully,

Derek Schubert
President, SAVE International

[請將茄苳濕地重新指定為國家級重要濕地]

國際黑面琵鷺後援聯盟給行政院長林全的一封信

本信寄發至「行政院院長電子信箱」<https://eyemail.ey.gov.tw/en/MailToPremier.aspx>

SAVE International

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國際黑面琵鷺後援聯盟

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2016 年 8 月 22 日

收件人：行政院長林全

主 旨：茄苳濕地重新指定為國家級重要濕地

敬愛的林全院長：

謹代表國際黑面琵鷺後援聯盟(SAVE International，以下簡稱 SAVE)，懇請行政院改變高雄市政府將茄苳濕地再評定為地方級重要濕地的決定，而非國家級或國際級重要濕地。高雄市政府歷來對茄苳濕地進行多次環境評估，持續都是基於政治考量，而非依據科學根據：從最早針對 1-4 號計畫道路的環境影響評估，到最近對於茄苳濕地的再評定作業皆然。事實上，高雄高等行政法院已判決高雄市政府於 2014 年 7 月 17 日有條件通過 1-4 道路開發計畫環境影響評估之行政程序具有瑕疵，應予撤銷。若依據台灣濕地保育法，嚴謹地執行再評定作業，茄苳濕地至少應被重新分級為國家級重要濕地。

令人難以致信的是，茄苳濕地再評定作業依然僅將其定位為地方級重要濕地。茄苳濕地季節性的淺水域、濕地植被，提供生物棲息與覓食，是超過 100 種鳥類的理想棲地環境。此濕地所支持的生物多樣性與生態功能，已經符合國際拉姆薩公約的濕地保護標準：任一濕地，棲息有單一種水鳥其全球百分之一以上的個體數量，便可被認定為「國際級濕地」，應受到相應層級的保護。單是 2016 年，來到茄苳濕地度冬的瀕危物種黑面琵鷺(*Platalea minor*)數量，就佔了全球族

群數量的 4%；也是全台度冬黑琵數量的 6%。茄荳濕地已經連續多年得到這種殊榮，受到黑面琵鷺的青睞。

此外，SAVE 反對茄荳濕地再評定分析報告書中所建議新的濕地範圍。一如許多其他的國際級重要濕地，茄荳濕地的生態雖然已歷經多次的人為破壞；但若依新的建議範圍，將茄荳濕地分割為五個區塊(包括已建成的 1-1 道路和 1-4 計畫道路範圍)，表示再評定作業主管機關並未正視到--此重要比例的黑面琵鷺族群，仰賴完整濕地(含 1-1 道路南北兩側)作為覓食與棲息地的事實。甚且，1-4 道路的預定位址，將穿越黑面琵鷺棲息的核心地帶。依據保育生物學，道路開闢不但會造成棲地碎裂化，也會衝擊棲息中鳥類啟動警戒所需的飛行起始距離。

SAVE 早在 2014 年就對茄荳濕地進行了詳盡的分析，因此我們熟知茄荳當地存在道路開發爭議與濕地定位的議題。當時的分析工作乃結合了美國加州柏克萊大學與台灣成功大學的眾多科學家和環境規劃專家，以及來自高雄、茄荳在地社團的共同參與。這份分析報告載明了茄荳擁有的環境資產和面對的挑戰，我們同時也對茄荳未來整體的發展，從土地合理利用的觀點，提出完整的規劃建議 (請參考本會「1-4 號道路暨茄荳濕地相關開發計畫之影響評估--茄荳經濟發展之策略計畫」

https://savespoonbills.files.wordpress.com/2014/07/jiading-final-report-june-2014_t_w_po-hsiu.pdf)。在 1-4 道路開發爭議持續的期間，SAVE 已多次提出書面陳情文件，並於高雄市議會公聽會、立法院記者會上提出相關研究分析及規劃成果。因為我們認為道路開發將對瀕危的黑面琵鷺、濕地、生態系統與地方經濟產生嚴重的衝擊。

SAVE 持續對台灣的濕地提出以科學研究為基礎的規劃，甚至比中央或地方政府更早，茄荳濕地只是其中一處。SAVE 於 1997 年成立，當時成立目的就是為了評估台灣七股濱南石化工業開發計畫的衝擊，隨後 SAVE 提出區域替代性經濟發展的計畫，不僅成功地挽救了西南沿海數以千計的漁民生計，並為雲林、嘉義和台南創造了觀光旅遊的新經濟模式。日後，我們持續地研究黑琵棲地、推動以替代性經濟取代開發的觀念，並與在地團體合作，發展同時兼顧黑面琵鷺保育與地方經濟發展的計畫。黑琵保育的成功經驗要歸功於世界各地共同合作的夥伴，特別是台灣政府在其中扮演了領導性的角色，全球的黑面琵鷺數量才能逐年提升。歷來台灣政府投注於黑琵保育的努力，屢屢獲得國際社會的認同。SAVE 相信，一如 1990 年代的七股潟湖，茄荳濕地能為地方與區域帶來可觀的經濟優勢。

以上論點充分說明茄荳濕地有必要重新分級，SAVE 也以此呼籲台灣政府多年。然而，我們還想提供更多的訊息供台灣政府思考。倘若高雄市的政治人物能進一步了解過去兩年來，茄荳地區新興的發展趨勢，不難發現由 SAVE 及其他團體倡議的永續生態旅遊模式，已自發性地開展。例如，一位曾在 2014 年出席 1-4 道路計畫地方說明會的咖啡店老闆，已開始發展接待外地及外籍賞鳥遊客的民宿

事業。又有屏東大學的師生透過實際走訪茄萣，製作「茄萣文化生態旅遊地圖」，廣為遊客參閱。而前往茄萣賞鳥的遊客持續在增加當中。

更重要的是，茄萣濕地成為訓練新生代科學家和培力市民投入環境關懷的基地，這些都符應濕地保育法的核心精神。地方團體持續在濕地周邊舉辦活動，如：地方文史采風與濕地垃圾的清理行動。出於對濕地懷抱願景，乃催生了「守護茄萣濕地青年聯盟」，一個由茄萣在地青年發起的非政府組織。該團體已在地方籌辦了許多自我培力與環境教育的活動，其在 2015 年主辦的茄萣行動工作坊，參與者更含括台灣多所大學學生與來自東京工業大學的研究生。

最後，我們懇請台灣行政院盡其所能，改變高雄市政府提案將茄萣濕地評定為地方級濕地的決定，並確保將茄萣濕地至少升級為「國家級重要濕地」，甚至依茄萣濕地實際的生態資源條件，將其提升為「國際級重要濕地」。感謝您關注我們的意見。

Derek Schubert

國際黑面琵鷺後援聯盟 主席

敬上