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(Spoonbill Action Voluntary Echo)

A Project of Earth Island Institute

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HSU Wun-Long, Director General
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Dear Director General Hsu:

RE: Deny the flight zone for airstrip in SWCNSA near Ding-shan Village

I am writing to urge you to disapprove the flight zone for the airstrip in the Southwest Coast National Scenic Area (SWCNSA) near Ding-shan Village, especially in light of how close the site is to Chiku Wetland, one of Taiwan's Wetlands of National Importance. This airstrip would burden the local residents with noise and pollution, and it would threaten the ecology of the wetland, including endangered species that live there.

According to our colleagues in the Black-Faced Spoonbill Association (BFSA), CPA held a meeting on September 3 to discuss the request of the Civil Aeronautics Administration (CAA) to open the flight zone for this airstrip. Members of the BFSA were not invited to the meeting. We have learned that most of those at the meeting suggested approving the flight zone with some restrictions, such as closing it at certain times of the year and restricting the height of flights, but this is a bad compromise.

Chiku Wetland is home to different migratory birds throughout the year, not just in one season. Although closing the airstrip during the winter roosting period of the endangered Black-faced Spoonbill (*Platalea minor*, or "hei mien pi lu") would prevent some conflicts, juvenile spoonbills often linger into the summer and other birds are also present in summer, so they would be in conflict with the airstrip.

We believe these restrictions would be hard to enforce; someone must be present to monitor the airstrip, turn away any pilots who do not know that the airstrip is officially closed, and ensure that any flights follow the height restrictions. We also predict that once the airstrip is open, it would not take long before the airstrip would be used full-time.

The Southwest Coast NSA has already demonstrated its inability to make sound decisions on the airstrip proposal and we expect that attempts to monitor would be done poorly, if at all. Already, 500 meters of a probable 800-meter length have been

graded, compacted, and edged in rock under NSA supervision, without environmental review or public comment, and certainly without formal approvals.

The attendees at the meeting on September 3 also suggested that the space should benefit both wildlife and human economic activity, and we at SAVE agree with this principle in general, but some forms of human activity are simply incompatible with wildlife. Airplanes would disrupt Chiku Wetland by taking off and landing directly in the flight-path of endangered spoonbills and near a core roosting area for that species. The birds might choose to abandon Chiku and move to other sites along the coast of Taiwan, but such a result would violate a basic principle of conservation biology: protect successful existing habitat. The airstrip should move, not the wildlife.

The SWCNSA and all of Taiwan have earned a good reputation worldwide for environmental protection and tourism based on authentic cultural and ecological heritage, not on short-term schemes such as "air tourism". The endangered Black-faced Spoonbill, in particular, has been central to the success of the SWCNSA and many tourism-based businesses of Tainan, Chiayi, and Yunlin counties. When an airport was proposed for this same area more than twelve years ago, SAVE International and our colleagues at the University of California, Berkeley, published a report that revealed the problems associated with the airport. This is a link to the report: https://savespoonbills.files.wordpress.com/2015/04/la205_2003report_tainanairport.pdf

In summary, the airstrip is inappropriate and must be completely dismantled. We at SAVE ask that CPAMI coordinate with the CAA to deny the flight zone, undo the construction that has already occurred, and restore our trust in Taiwan's leadership for protecting habitat for the endangered Black-faced Spoonbill and other migratory birds.

I look forward to hearing from you immediately. If you have questions about this issue, please do not hesitate to contact me at the addresses above.

Respectfully,

Derek Schubert
President, SAVE International

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