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# SAVE International

## (Spoonbill Action Voluntary Echo)

A Project of Earth Island Institute

c/o Earth Island Institute  
2150 Allston Way Suite 460, Berkeley, CA 94704  
phone: (510)238-9652 ■ email: [save.spoonbill@gmail.com](mailto:save.spoonbill@gmail.com)  
[www.saveinternational.org](http://www.saveinternational.org)

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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](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