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SAVE International

(Spoonbill Action Voluntary Echo)

A Project of Earth Island Institute

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October 6, 2016

Wetlands Review Task Force, Ministry of Interior
(17 members, listed below)

Subject: Jiading Wetland, redesignation to Wetland of National or International Importance

Dear Wetlands Review Task Force:

On behalf of SAVE International, I am writing to ask you to reverse the determination by Kaohsiung City that Jiading Wetland should remain designated as a wetland of only "local importance". Kaohsiung City 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 January 2016, the Kaohsiung High Administrative Court ruled in favor of the appellant, saying that the “administrative sanction [the EIA for Road 1-4] requires revocation,” and the Supreme Administrative Court upheld this decision in September. If this assessment had been done with any rigor, Jiading Wetland would have been reclassified at a minimum to the level of national importance or even international importance, using the terms of Taiwan's Wetland Conservation Act.

It is inconceivable that Jiading Wetland continues 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 the environmental assets and challenges at Jiading, and proposes future plans for land use. We are including our report with this letter if we have a direct email address for you, or you can find it online at this shortlink to the SAVE International website: <http://wp.me/aMqdF-i1X>. 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. For almost 20 years, we have continued 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 central 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. More and more birdwatching tourists are visiting the wetland.

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 organization, 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 you reverse Kaohsiung City's decision that Jiading Wetland remain only a locally important wetland, and reclassify Jiading Wetland as a wetland of at least national importance or even international importance. Thank you for your consideration.

Respectfully,

Derek Schubert
President, SAVE International

Members of the Task Force:

Category	Name	Position	Institution / Organization	Email or Web Contact
Rep. of official institution	Tsyr-Ling Lin 林慈玲	Administrative Deputy Minister	Ministry of the Interior	Mail To Minister link: https://service.moi.gov.tw/ccss/bin/eng001q1.asp
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	Rong-Jin Wang 王榮進	Deputy Director General	Construction and Planning Agency, Ministry of the Interior	Mail To Director-General link: http://service.cpami.gov.tw/index.php?option=com_mailhead&view=mailhead&lang=1&Itemid=8
	Jhy-hwa Chen 陳智華	Deputy Director	National Property Administration, Ministry of Finance	Mailbox for public opinion: https://www.fnp.gov.tw/en/PubOpinionMail.php
	Ta-Kun Shen 沈大焜	Deputy Director of Fisheries Regulation Division	Fisheries Regulation Div., Fisheries Agency, Council of Agriculture, Executive Yuan	Contact with Fisheries Agency by Director-general's mailbox: http://www.fa.gov.tw/en/ForumsDirectorMail/
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	RONG-SHENG XIA 夏榮生	Director of Conservation Division	Conservation Division, Forestry Bureau, Council of Agriculture, Executive Yuan	Contact with Forestry Bureau: http://www.forest.gov.tw/EN/suggestion
	HUNG-TSE YEN 顏宏哲	Senior Engineer	Water Resources Agency, Ministry of Economic Affairs	Contact with Water Resources Agency: http://eng.wra.gov.tw/sp.asp?xdURL=pDataProtect.asp&unitName=pDataProtect&S=back&codeName=opinionEng
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	Hsiao-Lan LIU (vice-convener)	Professor	Dept. of Land Economics, National Chengchi University	slliou@nccu.edu.tw
	Hsin-Wen Chang	Chair and Professor	Department of Leisure and Recreation Management, Chung Hua University	hwchang@chu.edu.tw
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2016年10月6日

內政部重要濕地審議小組 (17位委員，請詳文後列表)

主旨：重新指定茄苳濕地為國家級或國際級重要濕地

敬愛的委員：

謹代表國際黑面琵鷺後援聯盟(SAVE International，以下簡稱SAVE)，懇請您改變高雄市政府建議將茄苳濕地再評定為地方級重要濕地的決定。高雄市政府已對茄苳濕地進行多次環境評估，歷來都是基於政治考量，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。2016年1月，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；高市府對此判決提出上訴，然而最高行政法院又於同年9月判決高雄市政府敗訴。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，或甚至為國際級濕地。

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1%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。根據2016年全球黑面琵鷺普查資料，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%。茄苳濕地已連續多年得此殊榮，受到黑面琵鷺的青睞。

此外，SAVE反對茄苳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，茄苳濕地的生態雖已歷經多次的人為破壞；但若依新的建議範圍，將茄苳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)，則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 年就對茄苳濕地進行了詳盡的分析，因此我們熟知茄苳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、茄苳在地社團的共同參與。這份分析報告載明了茄苳擁有的環境資產和面對的挑戰，我們同時也對茄苳未來的土地利用提出規劃建議。謹將該分析報告附檔於本信中，惠請委員參酌。若您非直接從個人信箱收到本會信件，敬請委員連結本會網站 <http://wp.me/aMqdF-i1X> 取得報告。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。因為我們相信，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，甚至先於中央或地方政府的計畫，茄苳濕地只是其中一處。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。近 20 年來，我們持續地研究黑琵棲地、推動以替代性經濟取代土地開發的觀念，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，茄苳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苳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，茄苳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/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苳，製作出茄苳文化生態旅遊地圖，廣為遊客參閱。以及有越來越多的遊客前往茄苳濕地賞鳥。

更重要的是，茄苳濕地已成為訓練新生代科學家和培力市民投入環境關懷的基地，此皆服膺濕地保育法的核心精神。在地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，更催生了「守護茄苳濕地青年聯盟」，一個由茄苳在地青年發起的非政府組織。該團

體已在當地籌辦了許多自我培力與環境教育的活動，其在 2015 年主辦的茄苳行動工作坊，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，我們懇請委員改變高雄市政府建議將茄苳濕地評定為地方級濕地的決定，並重新評定茄苳濕地為「國家級重要濕地」，甚至依茄苳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。

國際黑面琵鷺後援聯盟 主席 Derek Schubert

敬上

「內政部重要濕地審議小組」委員名單 (105.2.25-107.2.25)

	類型	姓名	性別	現職	兼任職稱	備註
1.	機關代表	林慈玲	女	本部常務次長	兼主任委員	
2.	機關代表	許文龍	男	本部營建署署長	兼副主任委員	
3.	機關代表	王榮進	男	本部營建署副署長	兼執行秘書	
4.	機關代表	陳智華	女	財政部國有財產署副組長	委員	
5.	機關代表	沈大焜	男	行政院農業委員會漁業署漁政組副組長	委員	
6.	機關代表	魏文宜	女	行政院環境保護署水質保護處簡任技正	委員	
7.	機關代表	夏榮生	女	行政院農業委員會林務局保育組簡任技正	委員	
8.	機關代表	顏宏哲	男	經濟部水利署簡任正工程司	委員	改派 經濟部水利署 105 年 6 月 29 日經水河 字第 10516068320 號函
9.	專家學者	盧道杰	男	國立臺灣大學森林環境暨資源學系副教授	委員	
10.	專家學者	劉小如	女	中央研究院生物多樣性研究中心、 國立臺北大學自然資源與環境管理研究所教授	委員	
11.	專家學者	李培芬	男	國立臺灣大學生態學與演化生物學研究所教授	委員	
12.	專家學者	簡連貴	男	國立臺灣海洋大學河海工程系教授	委員	
13.	專家學者	周嫦娥	女	國立臺北大學自然資源與環境管理研究所助理教授	委員	
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16.	專家學者	張馨文	女	中華大學休閒遊憩規劃及管理學系教授兼系主任	委員	
17.	社會公正 人士	陳德鴻	男	中華民國荒野保護協會理事	委員	