

Bumble Bee Gardens

Specializing in ecological and native plant gardening

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Dear Members of London City Council,

Council is currently considering a new proposal that would require all new development to plant 50% native plants in their dedicated green spaces, and no invasive species. We have taken the liberty of offering our opinion on this matter, and we appreciate you reading and considering our comments.

We are assuming the intent of this proposal came forward out of a concern for the well being of pollinators, and the preservation of native plant species, many of which are listed at risk. However, **we are encouraging Council to reject the current proposal, and instead adopt a proposal that is clearer and better defined to avoid misinformation and misunderstanding of the definitions of 'native' and 'invasive' plants.**

As Bumble Bee Gardens is a professional landscaping company that specializes in ecological, native plant gardens, we sincerely offer the following recommendations, as our business was founded out of the same concern for pollinators and the vanishing landscapes that support them.

1) New development be required to plant 100% plant species regionally native to southern Ontario - scientifically referred to as the Carolinian EcoZone.

The Carolinian EcoZone is specific. Landscapers, landscape architects and plant nurseries understand this term. This defines a 'native' plant in this region.

There is no rationale to justify a 50% native plant requirement. Pollinators use a lot of energy searching for food. It is in their best interest to conserve energy. Therefore, landscapes should strive to provide a variety of food supply for their entire life cycle. A wide diversity of native plants is clearly the best way to achieve this.

2) Enforce legally required setbacks in new developments.

Council routinely approves new development with drastically reduced setbacks. Setbacks are typically where trees and gardens and lawns would be. It is important to enforce legal setbacks and contain underground parking lots to the footprint of the building so as to preserve soil. **Terraces are no substitute for native plant gardens as plant species selection is limited by soil depth, and the height may be prohibitive for pollinators.** Setbacks also gather rainwater, reduce flooding risk and return it to underground aquifers. Aquifers clean water and replenish our creeks and rivers. Without adequate setbacks, this proposal will not achieve its goals and critical water cycles will continue to deteriorate.

3) Update the city's Yard Maintenance By-Law

The particulars of this new proposal should be captured in the **Yard Maintenance By-law**. Terms such as 'native' and 'invasive' plants need to be defined there, not just for new development but for anyone wanting

to naturalize their property. Native plants are not sterile; their seeds can disperse widely. Unless better defined, native plants can be considered 'invasive'.

- Invasive plant species designation should be limited to plant species listed on the Noxious Weed List
- Native Plants should be defined as those plants regionally native to southern Ontario within the Carolinian EcoZone.
- Turf Grass should also be clearly defined to avoid confusion with lawns planted with alternative, sustainable 'no mow' native sedges and grasses.

To sum up, all new development should be required to plant with 100% plant species regionally native to southern Ontario. Proposed changes in the current bylaws need to be clarified and tightened so that the public and developers alike are spared confusion about what constitutes a native plant.

If your goal is to protect both pollinators and vanishing native plant species, then pollinator habitat should be everywhere, in areas both large and small, rural and urban.

Simon Luisi
Bumble Bee Gardens

Special Note:

There are two bumble bee species that have been recognized by the government via assessments by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), as endangered species: the Rusty-patched Bumble Bee (*Bombus affinis*) and the Gypsy Cuckoo Bumble Bee (*Bombus bohemicus*). Feb 1, 2022

As of December 22, 2023, Monarch butterflies, have been added to the endangered list, under Canada's Species at Risk Act (SARA). This is an up-listing from their previous status of special concern.

