WESTMOUNT HILLS RESIDENTS ASSOCIATION

March 27, 2012

To the members of the City of London Planning and Environment Committee:

We are writing to oppose and protest the City's aggressive policy of culling all ash trees on public land, which has recently devastated the natural landscape of Tobin Court. During the first week of March the City cut down **all** but one of the ash trees on Tobin Court - 20 in total - without sufficient prior warning or consultation. These were mature, 25 year-old trees with no visible signs of Emerald Ash Borer disease. Their loss has significantly reduced the visual attractiveness of a mature neighbourhood, reduced property values by more than $300,000 on Tobin Court, and eliminated the substantial ecological and environmental benefits of a well-developed tree canopy.

While the residents are fully aware that the Emerald Ash Borer presents a challenge for the City, we are opposed to the policy of automatically cutting down all ash trees when more cost-effective preventive measures using pesticides are possible. The City would both save money by injecting trees rather than by cutting them down, and would allow the benefits of the tree-scape to continue.

Unfortunately the damage is now already done on Tobin Court. We request that the City take these immediate steps to help restore the neighbourhood environment:

1. Inject the sole remaining ash tree on Tobin Court with TreeAzin
2. Plant a minimum of **1.5** trees on Tobin Court for every lost ash tree
3. Plant the new trees in **early Spring** rather than later in the year
4. **Consult** with the residents of Tobin Court regarding choices of tree species and precise planting locations on each property

Reasons for opposition to the City's aggressive EAB management strategy

We urge the City to immediately halt its current EAB management policy of cutting down 95% of all public ash trees in London before similar damage is inflicted on other streets and neighbourhoods. We recommend that the City instead adopt a preventive policy of injecting all healthy trees and those with no visible signs of EAB to protect them against infestation. The City should dramatically increase the number of trees currently marked for pesticide injection beyond the current number of 384, which represents just 4% of almost 10,000 ash trees marked for culling. Instead, the City should inject every eligible tree on streets and in parks – an estimated population of

5,068 trees.[1] This would save more than 50% of London's public ash trees. We outline the rationale for our recommendation below:

1. **The cost of inoculating trees against EAB with pesticides is less than the cost of cutting down and replacing trees.** According to the consultant's report commissioned by the City (written by Davey Resources), the cost of injecting eligible trees with TreeAzin, which has proven effective at preventing EAB, is $140 every 2 years for the average size eligible tree.[2] This cost would likely be reduced should the City adopt a large-scale injection program. Over a ten year period, the total cost of injecting a typical tree would thus be, at most, $700.[3] By contrast, the estimated cost of cutting down a tree, removing and disposing the trunk, grinding the stump, and purchasing and planting 1.5 new trees (as per City policy) is approximately $885 – more than the cost of injection.[4] On this basis alone, the City should be injecting trees, not cutting them down.

2. **The City's policy is based on a flawed consultant's report that ignores the benefits of retaining healthy trees.** The Davey Resources report is biased towards the recommendation of cutting down 95% of ash trees since it focuses on the *costs* of alternative approaches to managing EAB. The report does not include estimates of the *benefits* of saving ash trees through injection programs. Yet, comprehensive policy recommendations should be based on a full cost-benefit analysis. Although the benefits are hard to quantify, this does not mean that they are not meaningful. In recent years there has been a tremendous amount of academic research that explicitly quantifies the

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[1] According to the Davey Resources September 2011 report (page 21), there are 5,068 ash trees on streets and in parks that are in Fair, Good or Excellent condition, and that have a trunk diameter greater than 10cm. Insecticide treatment on these trees would help prevent infestation with EAB.

[2] The Davey Resources survey found there were 3,648 ash trees on streets in London that were in Fair or better condition and with trunk diameters greater than 10 cm (page 27). The average diameter of these trees is 23cm. The City estimates the cost of injecting ash trees with TreeAzin is $6 per cm.

[3] In reaching the recommendation that the City cut down trees rather than inject them, the Davey Resources report claims a program of injecting trees with TreeAzin would need to extend over 15 years. However, this time period is not supported by credible evidence. BioForest Technologies estimates that injections will instead be required for 6 – 10 years. There is no firm consensus among independent experts about how many years of injections will be required as this is a continuous learning process. Once the EAB scourge has peaked, different pesticide application timelines may be appropriate and new treatments will likely surface or be approved as this is a continent-wide problem.

[4] Cost calculation based on estimates provided in Davey Resources report: cutting down a tree ($205), replacement tree purchase and planting ($600 for 1.5 replacement trees). We estimate an additional $30 for stump removal and $50 for stump grinding.

economic benefits of trees.[5] A local study by researchers at Ryerson University estimated the 25-year value of the environmental benefits per tree of $1,325, or $53 annually.[6] Clearly, the life-time benefit is substantially greater than the cost of preventive injections.

3. **The consultant's report ignores the negative impact on property values of cutting down trees.** Independent research has also quantified the impact of street trees on private property values, and has found the effects to be significant. A study in Portland, Oregon, found that street trees growing near a house added an average of $7,020 to its sale price – or 2.4% of the average sales price.[7] On Tobin Court, where the average assessed property value is $600,000 this implies a loss of $14,500 per house in property value. In London as a whole, the average house price is approximately $230,000 – implying a reduction of $5,500 in property value from the loss of a proximate street ash tree. On this basis, the City will erase more than $20 million from property values if it continues to cut down all 3, 648 street ash trees.

4. **Independent expert organizations have endorsed preventive programs of pesticide injection rather than mass culling of trees.** On January 6, 2011, the Coalition for Urban Ash Tree Conservation stated its policy of responding to EAB as follows:

> "We the undersigned strongly endorse ash tree **conservation** as a fundamental component of integrated programs to manage emerald ash borer (EAB) in residential and municipal landscapes. **Cost-effective**, environmentally sound EAB treatment protocols are now available that can preserve ash trees through peak EAB outbreaks with healthy canopy intact. Used in association with tree inventories and strategic removal / **replacement of unhealthy ash**, tree conservation will help retain maximum integrity and value of urban forests. This integrated approach to urban EAB management is supported by university scientists with expertise in EAB management, commercial arborists, municipal foresters, public works officials, and non-governmental organizations (NGOs)."[8] [emphasis added]

5. **Other organizations are adopting a more moderate approach.** Western University is only removing ash trees on campus once they display severe signs of EAB infestation. The university is not cutting down healthy ash trees. Such a moderate policy is still compatible with safety concerns and is fiscally prudent. We recommend that the City adopt a similar policy of selective removal of trees

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[5] Economic benefits stem from energy savings due to shading and microclimate impacts, atmospheric CO_2 reduction, air quality improvement, storm-water runoff mitigation.
[6] Millward, A. and Sabir, S. 2011. Benefits of a forested urban park: What is the Value of Allan Gardens to the City of Toronto, Canada?
[7] Donovan, G. and Butry, D. 2008. Market Based Approaches to Tree Valuation at Donovan.hnri.info/pubs/arbnews_2008_08.pdf
[8] www.emeraldashborer.info/files/conserve_ash.pdf

that are obviously diseased. This would permit a more gradual replacement of trees as they become infected in neighbourhoods and avoid the sudden shock of losing all trees at one time.

6. **The City did not provide sufficient warning or consultation to local residents**. The City sent a leaflet to residents indicating that ash trees in the neighbourhood may be removed as part of the EAB management plan. However, this provided no indication of the *scale* of the culling that would take place on *Tobin Court*. Had residents known in advance that every ash tree would be cut down then there would have been requests for meetings with the City to discuss the rationale and alternative options – such as using pesticides. In the future, residents should be provided with much more detailed information, especially on such drastic policy proposals that directly and significantly affect residents' properties.

In summary, the economic benefits of saving street ash trees in residential areas are estimated to be more than $5,500 in increased property values and $1,300 in environmental value per tree. The combined benefit of $6,800 per tree massively outweighs the $700 cost of injecting eligible trees with pesticide to prevent future EAB infestation. Furthermore, the cost of injecting is less than the $885 cost of cutting down and replacing trees. For these reasons, we believe there is an overwhelming case for the City of injecting public ash trees rather than cutting them down.

We look forward to your response.

Sincerely,

Dr. and Mrs. S. Barrett	2 Tobin Court
Mr. and Mrs. S. McIlwaine	6 Tobin Court
Mr. and Mrs. J. Clifford	10 Tobin Court
Dr. and Dr. N. Foxcroft	14 Tobin Court
Mr. and Mrs. V. Tran	18 Tobin Court
Mr. and Mrs. J. Ramsey	30 Tobin Court
Dr. and Dr. M. Kus	34 Tobin Court
Dr. and Dr. J. Lobos	38 Tobin Court
Dr. and Mrs. G. Holburn	42 Tobin Court
Ms. J. Watts and Mr. M. Sherlock	46 Tobin Court
Mr. and Mrs. R. O'Dowda	54 Tobin Court
Dr. C. Mase and Dr. P. Moore	58 Tobin Court
Mr. and Mrs. M. Luton	62 Tobin Court
Dr. and Mrs. T. Turner	66 Tobin Court
Dr. J. Kojlak	70 Tobin Court
Mr. and Mrs. R. Moore	74 Tobin Court
Dr. and Mrs. A. Bhamjee	82 Tobin Court
Dr. and Mrs. S. Sunderji	86 Tobin Court
Mr. and Mrs. G. Gorham	90 Tobin Court