



Memo

To: EEPAC
From: Environmental & Parks Planning (E&PP)
Date: July 17, 2017
RE: City Responses to EEPAC's Comments on the Draft London Invasive Plant Management Strategy – November 2016

E&PP thank EEPAC for their review of the Draft London Invasive Plant Management Strategy (LIPMS) for the City of London.

EEPAC Comments on LIPMS received November 11, 2016 (Circulated October 21, 2016 to EEPAC)

- The document is very detailed about the policies and legislation supporting the control of invasive plant species, and I understand the need to provide a policy context for the development and implementation of an invasive plant management strategy. However, the document spends too much time directly quoting the supporting sections out of these various policies and legislation. Many of the statements supporting the control of invasive species are very similar among the policies and legislation, which makes the “Policy Context” section difficult to read. Perhaps this section can be made more concise by summarizing the main ways in which the existing policy and legislation support the invasive plant management strategy.
 - *Staff Response: Agreed, policy section has been removed and added as an appendix to the LIPMS*

- Incorporate the various departments of the City directly into the “Strategic Process” section of the management strategy instead of talking about the Storm Water Management and Parks Operations departments as separate sections at the end of the document. This will better establish the need to incorporate all relevant departments of the City into the invasive plant management strategy.
 - *Staff Response: The strategic process section is based on the OIPC document “Creating an Invasive Plant Management Strategy: A Framework for Ontario Municipalities.”*

- Why were the four priority invasive plant species selected? It would be helpful to specifically explain why Phragmites, Japanese Knotweed, Dog Strangling Vine, and Giant Hogweed were selected as priority species.
 - *Staff Response: Further clarification has been provided in the LIPMS.*

- In the “Socio-Economic” subsection of “Impacts of Invasive Species” the primary example provided for the economic impacts of invasive species was Emerald Ash Borer. Though I agree this is an important invader, the example is poorly chosen given the section is about the impacts of invasive plants. Perhaps a specific example of the economic impacts of plants would be more effective and illustrative.
 - *Staff Response: Agreed, example has been removed.*

- The document could be improved by making a section emphasizing the effectiveness of invasive plant species control programs. The document speaks broadly about how the control of invasive species is important for the health of the natural heritage features and will reduce future control costs. However, do invasive plant species control programs work and on what scale? Are there existing examples of programs that are effectively controlling invasive plant species? St. Thomas was used as a case study, but there is not sufficient evidence provided about this example to support whether invasive plant management is truly effective. Providing evidence to support the viability of invasive plant species control programs will help bolster support from council and the community because there are doubts about whether we can manage such a persistent and widespread threat.
 - *Staff Response: LIPMS sections already address the concerns raised (i.e. Section 2.0 and Section 8.0 for examples)*

- More detail about the implementation of the strategic process for invasive plant species management would strengthen the document. Currently, the strategic process section is very high level and provides few specific details about the implementation of the strategy. Also, more information regarding “who” will be involved in the various steps of the strategic process will be helpful. For example, who is going to do the inventory/mapping or deal with early detection? Who will be involved with the rapid response to an early detection of an invasive plant? Providing more detail on implementation will make the strategy seem more feasible and realistic.

- *Staff Response: This document is intended to be a high level document and that section outlines a hierarchical approach that can be applied to all priority species in various situations and locations. The 'who' will also vary depending on the location and species. The departments involved include the SWM unit, Parks Operations, Urban Forestry, City Weed Inspector, Environmental and Parks Planning, the UTRCA (City funded ESA team), and members of the public (observation reports).*

- I agree that there is more philosophy than concrete action outlined in the document, and it doesn't offer too many clear directives.
 - *Staff Response: The LIPMS is based on the OIPC document "Creating an Invasive Plant Management Strategy: A Framework for Ontario Municipalities. Also, please see the Recommendations – Section 10.*

- What is the prioritization order for invasive species and sites (e.g. protect SAR first, then riparian corridors)?
 - *Staff Response: Please see Section 6.0 and Section 7.2.*

- What is the seasonal time course for invasive control (i.e. need to hit invasives before they flower, if applicable)? A generic annual timeline for invasive control would be good to have, and make sure that no funds or time allocated to invasive control goes to waste. Something like this needs to be in this document - it might be something that the city ecologists know, but it is unlikely that anyone else in the civic administration is aware of it.
 - *Staff Response: Please see Section 7.0.*

- I am concerned with whether sufficient funds will be allocated to properly deal with invasives under this strategy. Given how aggressive the approach needs to be, it is something with which Council needs to be on board.
 - *Staff Response: Agreed, sufficient funding is a requirement to successfully implement the LIPMS.*

- Complete and absolute prohibition on the sale and trade of invasives needs to be enacted immediately and enforced with extreme prejudice if any invasive management strategy is to work.

- *Staff Response: See the Ontario Invasive Species Act (in force 2016), which is identified in Appendix C.*

Staff Comment: Additional uncollated comments were received by E&PP staff from the EEPAC working Group. While these comments were reviewed and addressed through revisions to the LIPMS, individual responses cannot be provided as the comments came in the form of hand written notes and other formats.