St. Charles Lake Watershed Stewardship Association
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Sudbury, ON
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Biodiversity Coordinator
MNRF – Biodiversity Section
300 Water Street
5th Floor, North tower
Peterborough, ON
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March 14, 2020

Dear Biodiversity Coordinator:

Please accept this feedback in response to the Ministry of Natural Resources and Forestry (MNRF) proposal number 019-1162 regarding invasive species and carriers. The proposal was posted on the Environmental Registry on February 13, 2020.

The feedback comes from the St. Charles Lake Watershed Stewardship Association. Our group represents almost 400 households in the St. Charles Lake, Middle Lake, and Hannah Lake watersheds in the City of Greater Sudbury, and the interests of additional local citizens who use the public park on St. Charles Lake.

We note that Eurasian watermilfoil is currently not included in the list of invasive species intended for regulation under the *Invasive Species Act, 2015*. We feel that Eurasian watermilfoil is a significant, widespread and exceptionally persistent invasive species in Ontario that must be added to the list as a prohibited invasive species.

Facts about the serious deleterious effects of this pernicious weed are included in Attachment 1. Other descriptions of its profoundly negative impacts go back at least 20 years in accounts from numerous US states and other Canadian provinces, municipal websites and websites sponsored by stewardship groups and cottagers' associations.

Invasive species are supposed to be recognized due to their harmful effects on Ontario's natural environment, or on Ontarians' socio-economic well-being. The experiences listed in Attachment 2 in response to the five questions included by MNRF in its Environmental Registry posting clearly demonstrate that Eurasian watermilfoil has significant negative impacts on both. They also illustrate why Eurasian watermilfoil deserves to be included as a prohibited invasive species in the proposed new regulation under the *Invasive Species Act, 2015.*

When Eurasian watermilfoil is formally recognized as a prohibited invasive species under the *Invasive Species Act, 2015*, it will empower the Province to take much-needed action in accordance with the objectives of the Act. In particular, it will enable work to reduce the existing and potential future harm caused by this aggressive and pervasive pest.

Finally, the St. Charles Lake Watershed Stewardship association supports the potential regulation of watercraft – and watersport equipment – over land as carriers under the *Invasive Species Act, 2015*, by making clean, drain, and dry principles and practices mandatory through regulation.

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When a draft regulatory proposal related to the current public consultation is developed and made available for public review, the St. Charles Lake Watershed Stewardship Association would appreciate receiving notice of the opportunity to comment.

Thank you for considering our input.

Yours truly,

Ruth Debicki

Ruth Debicki, M.Sc.
Secretary
St. Charles Lake Watershed Stewardship Association

2 Attachments

cc: Hon. John Yakabuski, Minister, MNRF
Hon. Jeff Yurek, Minister, MECP
Mr. Jamie West, MPP Sudbury
Ms. France Gélinas, MPP Nickel Belt
Ms. Deb McIntosh, Councillor, Ward 9, City of Greater Sudbury

Attachment 1 – Eurasian Watermilfoil Facts

- Eurasian watermilfoil is recognized as an invasive species by all three jurisdictions listed by MNRF in the "Related Links" section of its Environmental Registry Notice.
  - Minnesota's statutes designate Eurasian watermilfoil as a prohibited invasive species, and state that it is "unlawful… to possess, import, purchase, transport, or introduce these species except under a permit for disposal, control, research, or education."
  - Michigan put new boating and fishing laws that apply to all watercraft, trailers and other conveyances used to move watercraft into effect in March 2019 because "…invasive species move from one location to another with the help of human transportation" and "plants like Eurasian watermilfoil…can travel from lake to lake on boats and trailers."
  - Alberta recognizes Eurasian watermilfoil as an invasive species and has partnered with several organizations to study eradication methods.

- The negative impacts of Eurasian watermilfoil are widely known and well documented.
  - The Province of Ontario itself recognizes the deleterious effect of the plant on its www.Ontario.ca website. The website makes the following observations.
    - The plant reduces biodiversity by competing aggressively with native plants.
    - Reduced oxygen levels in the water caused by decomposing plants can kill fish.
    - Thick mats of Eurasian watermilfoil can hinder recreational activities such as swimming, boating and fishing.
    - Dense stands can create stagnant water, which is ideal habitat for mosquitoes.
  - The Great Lakes Indian Fish and Wildlife Commission notes other negative impacts at http://invasives.glifwc.org/Myriophyllum_spicatum/eco_impacts.html.
    - Dense beds of Eurasian watermilfoil can adversely impact animal populations.
    - Eurasian watermilfoil colonies strongly affect pH, lower dissolved oxygen levels, and affect and water temperatures below the canopy.
    - Eurasian watermilfoil extracts nutrients from sediments, releases them into the water column seasonally, and contributes significantly to eutrophication of lakes.
    - Some populations of Eurasian watermilfoil are dense enough to obstruct industrial and power plant water intakes.
  - The Indiana Department of Natural Resources reiterates the foregoing adverse effects at https://www.in.gov/dnr/files/EURASIAN_WATERMILFOIL.pdf and adds the following.
    - Eurasian watermilfoil colonies can become so dense that predator fish will lose their foraging space.
    - Lakes heavily infested with Eurasian watermilfoil will be aesthetically displeasing, resulting in reduced property values.

Attachment 2 – Answers to MNRF's Five Questions

1. Do you agree/disagree that we should review the identified species and carrier for regulation under the *Invasive Species Act, 2015*?
   - Eurasian watermilfoil should unquestionably be included in the list of identified species for regulation as prohibited species under the *Invasive Species Act, 2015*.
   - The carrier (i.e., watercraft) should be reviewed for regulation under the *Invasive Species Act, 2015*.

2. Do you have information, including personal experiences, that would help us as this review proceeds?
   - Yes. We have personal experiences that extend over a period of years.
     - All the lakes in the St. Charles Lake watershed, as well as numerous other lakes in the City of Greater Sudbury, have significant Eurasian watermilfoil infestations.
     - The infestations affect the enjoyment of lakeshore residents and park visitors in terms of swimming, boating, fishing, etc.
     - Experiments with weevils and lake-bottom barriers done by local stewardship groups in conjunction with Laurentian University and the City have yielded only limited, short-term reductions in the abundance of Eurasian watermilfoil.
     - At least one local resident had the most recent assessed value of his home reduced significantly by the Municipal Property Assessment Corporation (MPAC) due to the presence of Eurasian watermilfoil in St. Charles Lake.

3. Would the regulation of one or more of the proposed species or the carrier have a positive or negative economic impact on you or your business?
   - The regulation of Eurasian watermilfoil could have a positive economic impact on lakeshore residents and park users in the St. Charles Lake Watershed if it results in funding or other actions (e.g., authorization to disturb fish habitat) to enable the removal or control of the weeds.
   - The regulation of Eurasian watermilfoil could also have a positive economic impact on the natural environment, as well as recreation and the tourism industries in other lakes and reduce costs to municipalities seeking to protect their infrastructure if controls are developed that can have widespread application.
   - Further, the regulation of watercraft as a carrier could have a positive impact on lakeshore residents and park users. Research shows that as many as 80% of Eurasian watermilfoil fragments, such as those that might be carried on boats after their propellers cut through the plants, will root.

4. What rules do you recommend be applied to some or all the identified species or carrier – see sections 6, 7, or 8 of the *Invasive Species Act, 2015* for more information?
   - It might be appropriate to identify all water-related sporting equipment as "carriers" in regulations related to Section 6, since things like bait buckets, fishing tackle, water skis or other materials that are moved between lakes may inadvertently introduce invasive species where they do not already exist.
   - The regulation might include provisions subject to Section 8(2) of the Act to allow research on, and education about prohibited and restricted invasive species by clarifying

conditions whereby they may be brought into Ontario.

- The conditions might include allowing live individuals for research in controlled laboratory conditions, and dead individuals (e.g., immersed in alcohol or encased in plastic) for use in educational programs.

5. Should we consider exceptions to the prohibitions during the development of the regulatory proposal (e.g. allowing the import of the species provided individuals are dead)?
   - Samples of prohibited and restricted invasive species should be available for comparison and teaching purposes, provided the specimens are dead.
   - Samples of prohibited and restricted invasive species should also be allowed – under rigorously controlled laboratory conditions – so that experiments can be done to identify and assess potential controls on the species.