



April 9, 2020

Biodiversity Coordinator
MNRF - Biodiversity Section
300 Water Street
5th Floor, North tower
Peterborough, ON
K9J 3C7.

Re: Developing Prevention and Response Plans for European water chestnut and water soldier under the Invasive Species Act, 2015 (ERO #019-1163)

To Whom It May Concern:

Please find Credit Valley Conservation (CVC) comments on the proposal for developing prevention and response plans for European Water Chestnut and Water Soldier. CVC is pleased to see that the province is moving forward with plans to deal with invasive species, however, CVC does have a number of suggestions that would improve these plans.

General

- The title of the documents suggests that prevention and response plans would be present, however those plans are not and most of the document just allows agents to remove existing occurrences. CVC suggests that details on the following should be provided in revised plans:
 - agency and NGO roles and responsibilities for existing and future occurrences;
 - funding and resource allocations for existing and future occurrences;
 - monitoring results of existing efforts;
 - development of control targets;
 - timelines for implementation of control activities; and
 - actions to prevent the spread of Water Soldier and European Water Chestnut in the future.
- Additional details on proper disposal techniques (e.g. bury, burn, compost; is there a better method for plants vs. seeds; how far from a waterbody should the plants be taken) should also be included.
- Both plans indicate that hand removal in June is okay but also say that removals shouldn't occur during in-water work timing window guidelines. These guidelines restrict work in Southern Region where warmwater species (e.g. Largemouth and Smallmouth Bass) are present from May 1 – July 15. Please address this overlap.

Water Chestnut

- Sentence 3 in the first full paragraph on page 3 mentions Water Soldier instead of Water Chestnut and should be revised.

- In the last bullet at the bottom of pg. 5, the text says, "... or a strip of public." Need to add "land" since that is how the same line appears in the Water Soldier plan.

Water Soldier

- the Water Chestnut plan explicitly states that it is illegal to transport Water Chestnut overland on watercraft, but not Water Soldier. This statement should be added to the Water Soldier plan.

Please feel free to contact me at (905) 670-1615 x502 or by email at jon.clayton@cvc.ca if you have any questions or require clarification.

Yours sincerely,



Jon Clayton
Aquatic Ecologist

CC: Dawn Renfrew (CVC)
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