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Below are the comments on the IPM Vegetation Management Plan for Lanark County which I made in my recent letter to Lanark County Council.

From the letter:

I would encourage each of you to read this report from start to finish, and as you are doing this, ask yourself: Do I understand this? Is it clear? Do I have a clear idea how to proceed with the parsnip issue in a cost effective and efficient way? What is the endpoint we are striving for? How will we evaluate our progress toward this endpoint? This is a multi-year project.

It is very important not to adopt as a County guideline a report which each of you cannot fully follow and understand. If you are having trouble understanding this report, you are not alone. This may in no way reflect your own expertise or skill in this area; consider the possibility that the report is not particularly well written, organized or complete. What I see when I read this document is a rather fuzzy, convoluted journey involving more and more spraying of more and more plants- somehow sumac, phragmites and poison ivy have all gotten into the act. (This should really trigger a separate public consultation, if you are serious about addressing these additional plants.)

In no way does this report lead me step by step through a management plan for wild parsnip, complete with rationales, and alternatives. There are no stated acceptable endpoints, and no provision for evaluating progress toward an endpoint.

There are also some contradictions and inaccuracies. I invite you to turn to p. 28 in this document, to the table entitled Wild Parsnip Decision Tree.

Looking at the last 3 boxes in this table, bottom row, the recommendations are:

- 1) Glyphosate applications for spring /fall and following spring at pre-planting; cultivation
- 2) Establishment with plugs/plants established site sooner. Seedling less expensive.
- 3) As indicated, repeat herbicide application required at least 1 year to missed rosettes and new seedlings.

Not fully clear, given the language, but they appear to be recommending that you spray your new seedlings with herbicide. This would destroy them.

Perhaps this is not the authors' intention, but this is how it appears to be written, and if someone on one of your crews actually does this, it will be very costly.

This is not the right document to be your guideline.

Also of major concern to me is the material in Appendix 4, the list of plants the consultants have chosen as suitable for roadside plantings. Many of these are not suitable at all. Nor do they fit the categories in which they are placed.

For instance, in the first group, “Suitable shrub and short tree species for clear zones with mature height less than 0.6 m”, of the 7 plants listed in this group only 2 are shrubs or short trees, *Juniperus horizontalis* and *Vaccinium angustifolia*.

Four of the remaining 5 are very low, mostly creeping herbaceous plants, most of which prefer a sheltered, partly shaded forest venue. They are unlikely to thrive on a roadside. This can be verified quickly by referring to Peterson’s Field Guide to the Wildflowers, Peterson’s Field Guide to the Trees and Shrubs, or a similar publication for particulars on the size and habitat preferences of these plants.

The remaining plant, *Rubus pubescens*, is not in my list of references, and I am going to assume it is not native to here. **You should be very, very careful about introducing non-native species to roadside locations, from which they can spread into local ecosystems.**

Similar concerns apply to the other categories in Appendix 4. In addition, in the second one, “Suitable shrub and short tree species for wild life clear zones, with mature heights 0.6-1.2 m”, the plants listed as prickly currant and wild currant, *Ribes cynosbati* and *R. hirtellum*, are not currants at all, they are gooseberries.

You will need to ask your consultants how they chose the plants listed in Appendix 4. If you were to purchase large quantities of such stock for roadside planting, you could risk losing not only your investment, but could set back your remediation program for a year.

(Note: In addition, I have been reminded that some members of the *Ribes* genus are alternate hosts to white pine blister rust, and should therefore not be planted in this area.)

Linda Harvey