TO: The Town of Lewisboro Planning Board

FROM: Lewisboro Conservation Advisory Council

SUBJECT: Schilke Residence, 3 Beaver Pond, South Salem, NY 10590

DATE: October 13, 2021

The Conservation Advisory Council (CAC) has reviewed the materials submitted by the applicant for the correction of a violation and remediation of wetlands. The mitigation planting plan proposes to replace the 12 removed trees with 13 new trees, 50 shrubs and the use of native seed mixtures. In addition, the area containing the pile of wood chips will be spread out and used around the base of the new plantings. CAC does not know exactly where on the property the 12 trees were removed from, nor the species or size. CAC disagrees with the applicant's statement that cutting of vegetation and placement of wood chips does not have the potential to make long-term impacts to the wetland resource.

While the planting plan does bolster the area with native plants, the plan does not adequately address the lost dbh (diameter breast height) or lost tree canopy provided by 12 mature shade-trees. A 5-6' new tree is not the same as a 30-50' tree in terms of tree canopy, carbon absorption, habitat, and wetland buffer stabilization. As this is a violation, CAC recommends the tree replacement reflect a 2:1 ratio for the trees removed. Additionally, CAC recommends that the new trees are all 1.5"+ in dbh and native trees.

Japanese knotweed and stiltgrass are highly invasive and need a thorough maintenance plan in order to prevent regrowth. CAC would like to see the planting plan, specifically trees and shrubs, spread out more to include the area on the map labeled "dominated by knotweed and stiltgrass" along the pond. The applicant acknowledged the adjacent side of the pond is clear cut of trees, and what remaining pond edge is left should be planted to shade the western side of the pond.