

**TO:** Town of Lewisboro Planning Board

**FROM:** Lewisboro Conservation Advisory Council

**SUBJECT:** Handler Residence, 25 Woodway, sheet 38, Block 10549, Lots 12 & 20

**DATE:** October 2, 2018

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The Conservation Advisory Council (CAC) reviewed the applicant's submission documents and plans from September 2018.

While the CAC encourages the removal of non-native species and the increase of native meadows lands we have the following concerns with this application.

Much of the activity to remove invasive species is taking place in the wetland itself. In addition, the outflow from this property is the primary surface water source for Lake Truesdale. Since the herbicide to be employed is non-selective, this plan constitutes a complete clearing of substantial parts of the wetlands. The CAC would like to see detailed plans that show the extent of the wetland disturbance and how any disturbance is mitigated. Allowing total plant removal of this size in a wetland sets a dangerous precedent.

The CAC understands how difficult it is to get rid of phragmites, autumn olive and the others mentioned. However, the use of Aquaneat raises concerns. Aquaneat is a non-selective glyphosate based herbicide. This means that every plant in the area to be treated will be killed, both invasive and non-invasive.

Glyphosate based products can be toxic to certain types of fish and aquatic insects. The World Health Organizations and others have recently raised some concerns about links between glyphosates and cancer. Below are links to two recent articles on this subject.

<https://www.scientificamerican.com/article/weed-whacking-herbicide-p/>

<https://www.the-scientist.com/news-opinion/how-toxic-is-the-worlds-most-popular-herbicide-roundup-30308>

In the areas that border the ponds and streams or that could drain into the ponds and streams, CAC would prefer to see non-toxic methods employed. The CAC would like to know if mechanical methods of removal of non-native plants has been explored. In Pound Ridge, goats are being utilized to clear non-native plants without herbicides. The CAC would like to see a plan that prevents glyphosates from entering the wetlands including ponds and streams.

A site walk may help us to better assess this application.